

## **Excelsior Energy Center Pre-Construction Meeting**

March 20, 2025

#### **Agenda**

Introduction & Project Overview Scope of Work Regulatory & Environmental Overview Environmental Monitor Contractor Training Open Discussion Break Site Walk



## Introduction



#### **Project Description**

# Excelsior Energy Center ("the Project") is a 280-megawatt (AC) solar project located in the Town of Byron, Genesee County.

Project facilities will include:

- Commercial-scale solar arrays
- Inverters
- Access roads
- Electric collection lines
- Electrical interconnection facilities
- Perimeter fencing



The proposed collection substation and interconnection facilities will be located adjacent to the solar arrays within the project area.



#### **Project Area Overview**

- Project broken up into 20 work areas
- Primary laydown areas are located along Byron Road (red stars)
- Worker parking and trailers located at primary laydown areas
- Road Use Agreements with Town and County allow use of local roads
- Designated travel routes are established in Route Evaluation Study





#### **Project Team Organizational Chart**



**Collectively our services comprise Excelsior Energy Center, LLC** 



#### Developer's Organizational Structure Excelsior Energy Center, LLC





#### EPC's Organizational Structure Blattner Company - EPC





#### Safety

### **Site Safety Requirements**

- Veteran field staff abreast of the latest OSHA requirements
- Weekly safety meetings communicating risk and sharing best practices for risk mitigation
- Ongoing education on field safety risks
- Observations such as Daily Field Observations (DFOs) and Stuff That Kills You Observations (STKYs) geared towards safety
- Daily Plan of The Day (POD) meetings and Weekly All Hands addressing safety tips, concerns, mitigations, and covering progress



Excelsior is committed to maintaining a safe work environment and creating an inclusive safety culture where safety is everyone's job



Image Source: safety - Bing images

#### → BLATTNER HISTORY & CULTURE

#### NEVER COMPROMISE SAFETY

- At Blattner, we prioritize safety within our culture. We firmly believe that it is our duty to create and maintain safe work environments, ensuring that every individual can return home in the same healthy condition as when they arrived. We refuse to accept injuries as an inevitable aspect of our operations, and we will never subject our employees to unsafe conditions.
- Furthermore, it's crucial to emphasize that everyone, including yourself, possesses both the right and the responsibility to rectify any unsafe conditions or actions. We expect unwavering commitment from every employee, always dedicating themselves entirely to their safety.





▲ SITE SPECIFIC TRAINING

#### **THE CAPACITY MODEL**

- This model aims to eliminate life-threatening, life-altering, and life-ending events by focusing on human performance and building the capacity to fail safely (STKY & Energy Wheel).
- There are three phases of response in this model.
- 1. Prevention
- 2. Learning
- 3. Capacity for Failure



#### **SITE RULES**

Site safety rules include but are not limited to:

- Site-Specific Safety Orientation is required for all persons on site to communicate safety expectations and environmental aspects of Excelsior Solar
- Mandatory PPE requirements for all employees, visitors, vendors, and subcontractors
- All employees must be properly trained to operate machinery or equipment
- All accidents, injuries, and near misses must be reported to the Blattner Energy Site Safety Representative or Supervisor onsite
- All rules are derived from the Site-Specific Safety Handbook, which is available for distribution during orientation or by request



#### **EMERGENCY RESPONSE**

The site will have the project's Emergency Response Plan (ERP) onsite that addresses scenarios that could be experienced on the Excelsior Solar project. In addition to the ERP plan, the site team will:

- Meet and align with local agencies and officials
- Distribute maps with associated project addresses, entrances, and site contacts to local dispatch
- Educate all site personnel on emergency response procedures during on-site orientation and team meetings
- Coordinate mock drills internally as well as externally with the local responding agencies



## **ROAD & VEHICLE SAFETY**

#### **Speed Limits**

- Follow the state and county roads posted speed limits.
- Laydown yard: 5 mph Site Access & String Roads: 15 mph

#### Site Actions & Considerations

- Identify heights of all powerlines and install safeguards at crossing areas
- Post additional signage to provide advanced warning for traffic unassociated with project Regularly audit of employee driver statuses and .
- . designations

#### **Additional Information**

- Seatbelts must be worn at all times.

- Larger vehicles/equipment have the right of way. Do not park in the roadway and block traffic. Do not park in tall grass/vegetation to avoid starting a fire.
- Riding in the bed of pickup trucks is prohibited.



▲ SITE SPECIFIC TRAINING

#### **WASTE MANAGEMENT**

Blattner and its subcontractors are responsible for the proper handling, labeling, use, storage, and management of non-hazardous and hazardous materials.

#### Housekeeping

- Stay within the project boundaries and approved work areas.
- Remove trash and clean out buggies, trucks, and equipment to reduce the risk of snakes & other wildlife.
- Use designated dumpsters and waste containers for specific materials and keep covered/closed when not in use.



#### **Target Construction Schedule/Project Milestones**

Activities	Start	Finish
Site Mobilization	Mid April 25'	End April 25'
Site Prep/Civil Activities (SWPPP, Clearing, Grading, Roads)	April 25'	November 25'
Underground Collection	June 25'	May 26'
Foundations	June 25'	July 26'
Racking	August 25'	August 26'
Panels	August 25'	August 26'
Site Restoration	July 25'	October 26'
Construction Completion		October 26'



# **Scope of Work**



#### **Civil, Mechanical, and Electrical Construction**

### **General Construction Phasing**

- 1. Excelsior Solar will be generally constructed in the following sequence:
  - 1. Civil/Site Preparation
  - 2. Foundations
  - 3. Mechanical Assembly
  - 4. Electrical Testing and Commissioning





#### **Site Preparation Phase**

## Early Civil Construction Scope of Work (SOW)

#### SWPPP/BMP Installation

- Silt Fence, Filter Sock
- Main Laydown Yard and Substation Pad Construction
  - Topsoil stripping and rocking of laydown yard
  - Placement of temporary office and support facilities
  - Construction of substation and switchyard pads

#### Heavy Civil/Grading

- PV access roads
- Clearing and grubbing
- Sediment basins
- Mass grading
- Underground Collection
  - Trenching, installation, and backfill of collection cable both inside and outside of PV array
- Fencing
  - Chain link fencing will be installed as construction progresses



#### Mechanical construction and the solar array

## Foundation Scope of Work ("SOW")

#### Pre-Drill

- Drilling of holes in preparation for foundation pile installation
- Inverter Pile Installation
  - Utilization of hydraulic impact "hammer" to install pile foundations for inverters, aboveground cable support and electrical equipment support
- PV Array Foundations
  - Utilization of hydraulic impact "hammer" to install pile foundations for PV array



#### Mechanical construction and the solar array

## **Mechanical Scope of Work ("SOW")**

#### Stage & Prep

- Consists of receiving racking components in temporary laydowns which support a set area of the project
- Racking components are moved from temporary laydown to PV array in preparation for installation
- Racking Assembly
  - PV racking is assembled and fastened to previously installed foundations
- Aboveground Cable Support
  - Portions of the DC collection system run above ground. The cable support system is installed
- PV Module Installation
  - Modules are received and offloaded from containers close to the area in which they will be installed
  - Module boxes are staged in the array in preparation to be installed
  - Modules are installed onto the racking system and packaging is removed



#### **Electrical Construction**

## **Electrical Scope of Work ("SOW")**

#### Module Wiring

- Back of module to PV harness

#### • DC (1500VDC) Terminations

- Inverter
- Load Break Disconnect

#### • MV (34.5kV) Terminations

- Pad mount transformers
- Junction Boxes
- Substation Risers

#### Testing and Energization

- Cable Testing and energization of PV facility



# Regulatory & Environmental Overview



#### **Article 10 Overview**

#### **Article 10 Certificate Issued April 6, 2022**

- Certificate includes 150 conditions applicable to activities prior to, during, and after construction
- Also contains a guide for the Site Engineering and Environmental Plan (SEEP)
- The certificate outlines the compliance filings that must be filed with the Secretary of the PSC prior to commencement of construction related to the filing.
  - Compliance filings have been approved for: 1) Site Preparation phase (clearing & grading, approved 07/19/2022); 2) Civil Construction and Collection Line Installation phase (approved 09/19/2022)
  - Compliance filings for point of interconnection facilities currently under review by DPS

Certificate conditions are applicable to both construction and operation of the facility



#### **Overview of Article 10 Conditions**

#### **Certificate Conditions (CCs) Consist of Five Primary Topics**

- **Project Authorization (CCs #1 11)**
- General Conditions (CCs #12 21)
- Notifications (CCs #22 27)
- Information Reports & Compliance Filings (CCs #28 85)
- Facility Construction & Maintenance (CCs #86-150)
  - General
  - Environmental
  - Threatened and Endangered Species
  - Wetlands and Streams, Vegetation, and Invasive Species
  - Facility Operation



#### **Article 10 Notice to Proceed/Phasing Status**

#### Notice to Proceed is Issued by DPS for Project Phases

- Phases:
  - Site Preparation (Clearing & Grading), Civil Construction, and Collection Line Installation Phases approval anticipated early April 2025
  - Collection Substation, Switchyard, and Related Interconnection Facilities approval anticipated in time to support early June contractor mobilization
    - -- Separate pre-construction meeting will be required for POI phase
- Additional Authorizations Required:
  - Sound Study Compliance Filing: approval required prior to installing noise producing equipment (inverters, substation/switchyard components); filed March 2025
  - Decommission Plan: must be filed prior to installation of solar panels anticipated May/June 2025 filing
  - Cultural Survey Areas: areas still requiring cultural survey must be avoided clearance for work in all areas anticipated by May/June 2025
  - Article 10 Amendment for Collection Line Routes: An amendment petition to be filed in March 2025 to authorize installation of collection lines on four parcels that were not originally certified under Article 10

Notice to Proceed is required prior to commencing work on any phase – confirm appropriate approvals are in place prior to proceeding

#### **Minor Change Process**

#### Minor Changes from an Approved Compliance Filing

 A change in an approved compliance filing in which there is no discernable potential for increased adverse environmental impact and no change in specified conditions is considered a minor change (Part 1002.1(j))

#### • Process:

- Contractor to notify Excelsior's Site Construction Manager & NYS Compliance Manager of need for minor change
- Excelsior submits minor change documentation to DPS and DEC project managers for review
- If no objection by DPS/DEC to minor change, formal documentation of minor change is submitted to Secretary via DMM filing (by Excelsior)
- If approved, Secretary issues letter stating that the minor change may be implemented. Work
  may then proceed.

All deviations from the approved site plans, including value engineering, are subject to the Minor Change process



#### **Complaint Resolution Plan is a formal process**

## **Complaint Resolution Plan**

- Refer to Complaint Resolution Plan to address any complaints received during the construction process
  - All complaints received must be brought to the attention of Excelsior's Site Construction Manager & NYS Compliance Manager
- The Plan includes a Noise Complaint Resolution Protocol to address complaints specific to noise-related issues
- A complaint log will be maintained with records of complaints and the resolution thereof
- A complaint resolution flowchart is included within the Plan

Excelsior will contact complainant within 3 days of receipt of complaint to confirm its receipt and within 7 days to discuss a resolution plan



#### **Stormwater Discharges Associated with Construction Activity**

#### **SPDES General Permit and 5-Acre Waiver**

- Coverage under the State Pollutant Discharge Elimination System (SPDES) General Permit for Stormwater Discharges from Construction Activity required
- 5-acre waiver required to disturb greater than 5 acres during select construction phases; refer to phasing plan in SWPPP
- Stormwater Pollution Prevention Plan to be filed with Electronic Notice of Intent (eNOI)

**Coverage under SPDES GP required before commencing construction activity** 



#### **New York State Department of Transportation (NYSDOT)**

### **Transportation Permit Requirements**

- NYSDOT permits are required for oversized/overweight deliveries (OS/OW)
  - Contractors to ensure delivery routes align with those approved in the Route Evaluation Study
  - Permits must be provided to Excelsior Site Construction Manager
- Driveway Access Permit
  - PERM 33 COM approval required for driveway at State Route 262
- Fiber/Collection Line Permit
  - PERM 75 approval required for fiber/collection line installation in State Routes 262 & 237



NYSDOT permits to be filed on the DMM 10 days before OS/OW deliveries defined by Certificate Condition 37



# Environmental Monitor Contractor Training



#### **Stormwater**

## **Overview of Stormwater Prevention and Pollution (SWPPP)**

- Maintain a current copy of signed SWPPP on site
  - Signed owner/operator certification, SWPPP Preparer, and Contractor Certification forms
  - The documents must be maintained in a secure location, such as a job trailer, on-site construction office, or mailbox with lock

#### Perform SWPPP inspections at the required interval

- Qualified inspector conducts at least 2 site inspections every 7 calendar days, for as long as greater than 5 acres of soil remain disturbed
- Ensure the SWPPP is being updated according to the rules outlined in the SPDES General Permit
  - This includes changes in erosion and sediment controls practices that are being used or construction design that could affect the discharge of pollutants







#### **Best Management Practices**

#### **Best Management Practices (BMPs)**

- The work area shall be defined to protect and clearly identify the boundaries of non-work areas associated with wetlands, waterbodies, sensitive resources, and setbacks.
- Install BMPs prior to ground-disturbing activities.
- Keep BMPs in the correct location and in good condition.
  - Report any damaged or failing erosion controls to site construction manager and Environmental Monitor
  - Document any corrective actions or repairs

Soil stabilization measures must be initiated by the end of the next business day and completed within 7 days from the day current soil disturbance activities end





### Wetlands & Streams Wetlands Impacts Must Be Minimized

- State-Jurisdictional Wetlands:
  - No impacts to State-jurisdictional wetlands proposed
- USACE-Jurisdictional Wetlands:
  - One permanent impact to a wetland under the jurisdiction of the US Army Corps of Engineers for a crossing (Drawing C-436)
  - One temporary wetland crossing with timber mats (Drawing C-443)
  - Ensure all required BMPs are installed per the Erosion Control Plan
  - Refer to applicable Certificate Conditions



Drawing C-436



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RESOURCES

#### Wetlands & Streams

#### **Streams**

- No open-cut stream crossings are proposed
- The use of motorized equipment shall be prohibited in all streams
- All equipment and machinery shall be stored and staged at least 100 feet from any stream overnight at the end of each workday
- Ensure all required BMPs are installed per the Erosion Control Plan
- A vacuum truck and equipment required to contain and clean up a inadvertent release will be located on site when conducting HDD operations under Bigelow Creek and Black Creek, and will be accessible (within 15 minutes of the project site) during remaining HDD operations (per certificate condition 132)



ENERGY

RESOURCES

#### **Agricultural Land**

## Department of Agriculture and Markets (AGM): Guidelines for Solar Energy Projects

- Guidelines for mitigating construction impacts on agricultural land during Construction, Post-Construction Restoration, Monitoring and Remediation, and Decommissioning
- Agricultural Monitor (AM) to oversee construction and restoration compliance in agricultural areas to maximum extent practicable
- AM will maintain regular contact with the project and construction personnel and will coordinate with the AGM Division of Land and Water Resources as necessary to ensure the guidelines are being met
- AM will also maintain regular contact with the affected farmers and the AGM regarding farm resources and management concerns relevant to the agricultural operations


#### **Agricultural Land**

## **Avoiding & Minimizing Impacts to Agricultural Resources**

#### Construction

- Stripping, stockpiling, and return of topsoil to disturbed areas
- Seeding areas under the panels to preserve those areas for future potential agricultural use following decommissioning

#### Post-construction

 Monitoring and remediation of agricultural lands impacted by the project for at least two years following completion of initial restoration



To reduce the potential for impacts to these important soils during all stages of the project, please adhere to the AGM guidelines to the maximum extent practicable.



#### **Invasive Species**

### **Invasive Plants**

- Field survey identified 20 invasive  $\bullet$ vegetative species.
- **Figure 1 of the Invasive Species** Management Plan depicts the locations of field-located invasive species:
  - Glossy false buckthorn (Frangula) alnus).
  - Black locust (Robinia pseudoacacia),
    Yellow flag iris (Iris pseudacorus)
  - European buckthorn (Rhamnus cathartica).
  - Common reed (Phragmites australis),
  - Canada thistle (Cirsium arvense),
  - Dame's rocket (Hesperis matronalis),
  - Garlic mustard (Alliaria petiolata),
  - Japanese barberry (Berberis) thunbergii).
  - Japanese honeysuckle (Lonicera) japonica).
  - Morrow's honeysuckle (Lonicera) morrowii).
  - Rambler rose (Rosa multiflora),

- Pale swallow-wort (Vincetoxicum) rossicum)
- Purple loosestrife (Lythrum salicaria)
- Spotted Knapweed (Centaurea)
- stoebe)
- Norway maple (Acer platanoides)
  - Cut-leaf Teasel (Dipsacus laciniatus)
  - Mugwort (Artemisia vulgaris)
  - Autumn olive (Elaeagnus umbellata)
  - Japanese knotweed (Fallopia (aponica)





#### **Invasive Species**

#### **Invasive Insects**

Three invasive insect species that will be monitored for throughout construction:







No invasive insect species, or signs of infestation, were observed as part of the field survey.



#### **Invasive Species**

#### **Control Measures—BMPs**

## • To prevent introduction and spread of the listed species, the following BMPs will be enacted:

- Material Inspection: Limiting movement of products such as seed, mulch, topsoil, fill, sand, and stone, inspecting all materials for the presence of invasive species prior to transportation or use on the site
- **Target Species Treatment and Removal:** Hand-pulling, cutting, burying, excavating, or applying herbicide which will either kill, or limit the ability of a species to propagate
- Sanitation: Cleaning of clothing and equipment prior to movement or use within the Project Area, invasive species cleaning stations should be established to thoroughly clean machinery and clothing
- Site Restoration: Disturbed areas should be regraded and stabilized (with seed and mulch) as quickly as possible

Additional information can be found in the Invasive Species Management and Control Plan.



#### Wildlife

## Wildlife Monitoring

- Avoid wildlife impacts and interactions:
  - Don't touch, handle, or harm any wildlife
  - Stop any work that may kill or injure wildlife within the project
- Keep vehicular traffic in designated areas only and follow posted speed limits
- The EM will be available throughout construction if you suspect a species of concern is within or near the project area

If you see dead or injured wildlife, stop work in that area and call the Environmental Monitor immediately. Do not touch it!



#### **Threatened and Endangered Species**

## **T&E Species Monitoring**

- During construction, the onsite EM shall be responsible for recording all occurrences of New York State T&E species.
  - All occurrences shall be reported in the biweekly (every 2 weeks) monitoring report submitted to the DPS and NYSDEC and shall include the information described in Certificate Condition 103.
  - If a T&E avian species is demonstrating breeding or roosting behavior for that species it will be reported to NYSDEC within 24 hours per Certificate Condition 100.
  - Certificate Condition 100 indicates areas that must be avoided when a T&E bird species is discovered and confirmed by the EM, typically a 500' radius.
- If T&E species are encountered during construction, operation, or maintenance of the project, or discovered during an environmental inspection prior to construction-related activity, Excelsior, in consultation with the EM, will notify NYSDEC and USFWS (as applicable, for federally listed species) within 24 hours.



#### **Threatened and Endangered Species**

## **Species of Concern**

- There is no record of listed species occupied habitat within the project area
- Several listed species have the potential to occur within the project area:
  - Short-Eared Owl
  - Northern Harrier
  - Upland Sandpiper
  - Henslow's Sparrow
  - Sedge Wren
  - Bald Eagle
  - Northern Long-Eared Bat



#### **Threatened and Endangered Species**

## **Short-Eared Owl**

Asio flammeus

- General Description: Medium-size owls with small ear tufts on the top of the head; round, beige facial disks; underparts are white/buff (male) or tawny/rust (female), and streaked with brown, while the back is brown and mottled with white; when perched, the wings extend beyond the tail; in flight, the undersides of the wings show dark markings on the wrists and wing tips
- **Preferred Habitat:** Widely distributed breeding in marshes and grasslands throughout North America and Eurasia; occur in open areas where small mammals are abundant, favoring habitats such as prairies, coastal grasslands, heathlands, shrub-steppe, and tundra



**New York Status: Endangered Species** 



## Threatened and Endangered Species Northern Harrier *Circus cyaneus*

- General Description: 16-24 inch, slender-bodied hawk has a long tail and wings, long yellow legs, distinct facial disks and a conspicuous white rump patch; adult male is pale gray on the head, back and wings; the wing linings and undertail are white, yellow eyes; female plumage is browner overall with dark streaks on the breast; female is born with brown eyes which will turn yellow; juveniles resemble adult females, have gray eyes
- **Preferred Habitat:** Communal flocks roost on the ground during winter; migratory periods in agricultural fields, abandoned fields and salt marshes; breeding occurs in freshwater and brackish marshes, fallow grasslands, meadows, and cultivated fields





## Threatened and Endangered Species Upland Sandpiper Bartramia longicauda

- General Description: Adult measures 11-13 inches with a long, thin neck and small head with large, dark eyes and white eye ring; long, yellow legs and a short, thin bill; adult coloration is buff above with dark brown barring; tail is proportionally long and extends past wingtips while perched
- **Preferred Habitat:** Population restricted to remaining grassland habitats of the St. Lawrence Valley and the Mohawk Valley; breeds in agricultural areas and grasslands surrounding airports (uncommon)





## Threatened and Endangered Species Henslow's Sparrow Ammodramus henslowii

- General Description: Flat-headed profile; olive coloring on head; wings are rustcolored; breast and sides are streaked with black; juveniles has olive head, rustcolored wings, no streaking on underparts
- **Preferred Habitat:** Fallow, weedy, often moist fields and meadows; breeding occurs in tall, dense grass, upland weedy hayfields, pastures without shrubs, wet meadows, and others; NY populations are localized especially in the Appalachian Plateau, Great Lakes Plain, and Mohawk Valley





## Threatened and Endangered Species Sedge Wren Cistothorus platensis

- General Description: Measuring 4 to 5 inches; brown upperparts, buff to white underparts, pale streaks on the back and crown; tail is short with black barring, held upright
- **Preferred Habitat:** Breeds in wet meadows or hayfields dominated by sedges and grasses, mostly a local breeder recorded in the St. Lawrence Valley and the Lake Ontario Plain





## Threatened and Endangered Species Bald Eagle

#### Haliaeetus leucocephalus

- General Description: Large bird of prey; 30 inches high, wingspan of 72-84 inches, weigh 8-14 pounds; brown body, white head and tail, bright yellow bill; immature bald eagles lack the white head and tail
- **Preferred Habitat:** Undisturbed areas near large lakes and reservoirs, marshes and swamps, or stretches along rivers where they can find open water; historically, nest in forests along the shorelines of oceans, lakes or rivers





## Threatened and Endangered Species Northern Long-Eared Bat (NLEB) Myotis septentrionalis

- General Description: Medium-sized bat with a body length of 3 to 3.7 inches; fur color can be medium to dark brown on the back, tawny to pale-brown on the underside; distinguished by its long ears
- **Preferred Habitat:** Any tree (live or snags) large enough to have a cavity or that has loose bark may be utilized by NLEB for roosting or rearing young; hibernate in caves or mines with constant temperatures, high humidity, and no air currents
- NYSDEC must be notified within 24 hours of discovery of NLEB maternity roost trees



Federal Status: Threatened New York Status: Threatened



#### Spills, Spill Prevention Control & Countermeasure (SPCC) Plan

## **Spill Prevention and Response**

- Only authorized employees carry out refueling, following the approved refueling procedures
- Provide secondary containment when possible to prevent any potential spills
- Spill kits must be accessible and clearly labeled
  - Keep these in refueling trucks and other appropriate locations on site
- Promptly report any spills to the site supervisor and EM
  - Any petroleum spill must be reported to the state
  - Excelsior, in consultation with the EM, will make any notifications
- Clearly mark any container used for spill cleanup and replace
  used spill kit



#### Spill Prevention, Containment and Countermeasure (SPCC) Plan

## **Know Your Spill Kit**





#### **Unanticipated Discoveries**

## **Unanticipated Discovery Plan**

- Indicators can include:
  - Recognizable quantities of bone
  - Unusual stone or ash deposits
  - Black-stained earth that could be evident in spoil piles or trench walls during construction
- Finds can include:
  - Arrowheads, scrapers, stone tools, and chips
  - Historic bottles and broken ceramics



EM and construction personnel will be instructed to follow the specific requirements and notification procedures outlined in the plan



### **Contact Information**

#### NextEra Energy Resources Environmental Services Construction Compliance

Lucinda Patt 607-319-6110 Lucinda.Patt@nexteraenergy.com

#### **Environmental/Agricultural Monitors**

Gary Anderson 716-695-4031 ganderson@mdmcorp.com

David Talbett 607-368-0498 <u>dtalbett@mdmcorp.com</u>

Please reach out with any questions or concerns throughout construction



## **Open Discussion**

**Questions?** 



# Site Walkthrough with Required Parties

**Review of select work limits, sensitive areas, exclusion zones** 

