

Comment Number	Commenter/Date	Date of Comment	PSS Section	PSS Section and Title	Corresponding Application Exhibit Number and Title	Comment (Per Commenter)	Applicant Response
1	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	1.5	Section 1.5 - Introduction - Impact Avoidance and Mitigation Measures	NA	This section should include impact avoidance and mitigation for loss of habitat and direct mortality to breeding, wintering, and migrating birds and bats, particularly state and federally listed threatened and endangered species.	The Article 10 Application will include a description of measures to be implemented to avoid or mitigate impacts to wildlife and wildlife habitat within the Facility Site (including threatened and endangered species) in Exhibit 2.22(g) and 22(h)(3).
2	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.2	Section 2.2 - Overview and Public Involvement - Description of Reasonable Alternative Location Sites	Exhibit 2 - Overview and Public Involvement	This section states "Stony Island is the nearest land mass, located approximately 2.5 miles east of Galloo Island". This should be updated to read: "Little Galloo Island is 43 acres and is approximately 1.0 miles from Galloo Island"	Comment noted. Reference to Little Galloo Island, including its size and distance from Galloo Island, will be included in the Article 10 Application.
3	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.9	Section 2.9 - Alternatives - Description of Reasonable Alternatives to the Proposed Facility at the Proposed Location	Exhibit 9 - Alternatives	Based on Figures 3 and 5, it would appear there are 3 turbines proposed to be sited in State wetlands and others in the 100 foot adjacent areas of those wetlands. Those proposed turbine locations would result in permanent wetland impacts. These impacts could be largely or wholly avoided by using alternate sites.	Figures 3 and 4 present a preliminary layout that was developed using publically available information (i.e., NYSDEC Wetland data, previously prepared delineation data). Project facilities were sited to minimize impacts to wetland resources; however, wetland delineation updates are underway as of July 11, 2016, and any wetland impact discovered from field study will be reviewed, minimized through micro-siting, and permitted as appropriate if necessary. The Applicant will identify the specific location of project components (including delineated wetland boundaries) in the Article 10 Application. All wetland impacts and minimization/avoidance measures will be presented in Exhibit 22(m) and (n).
4	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.9	Section 2.9 - Alternatives - Description of Reasonable Alternatives to the Proposed Facility at the Proposed Location	Exhibit 9 - Alternatives	This section also fails to recognize there is land owned by the State of New York on Galloo Island that could be used recreationally.	The Applicant recognizes that there is state-owned land on the Galloo Island. The Applicant will discuss the potential for recreational uses of the state-owned land with the NYSDEC and address these uses in the Article 10 Application.
5	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.9	Section 2.9 - Alternatives - No Action Alternative	Exhibit 9 - Alternatives	There is a redundant section title at the top of the page.	Comment noted.
6	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.9	Section 2.9 - Alternatives - No Action Alternative	Exhibit 9 - Alternatives	This section fails to address the changes to the aesthetic view from the mainland by the addition of commercial/industrial wind towers, if any, which needs to be determined and verified through a visual assessment. No action would keep the current aesthetic view while building the facility will change what is seen from shore.	As stated in PSS section 2.9(f), the Article 10 Application will include a statement of the reasons why the no action alternative to the Facility is not best suited to promote public health and welfare. Exhibit 9(f) will address the current aesthetic view. Further changes to the aesthetic view from the mainland will be addressed in the Article 10 Application as stated in section 2.24.
7	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - Characterization of Vegetation, Wildlife, and Wildlife Habitats	Exhibit 22 - Terrestrial Ecology and Wetlands	NYSDEC has not yet received the results of any 2015 bird and bat surveys, and requests draft reports be submitted as soon as possible, and prior to the Article 10 Application. This will allow staff time to review information collected on wildlife use of the site and make any additional study recommendations, should any be warranted. Most surveys are time sensitive, and if further field work is needed, adequate lead time will be necessary for the Applicant to prepare work plans and execute the surveys in an appropriate manner.	The Applicant has submitted these documents on June 29, 2016.
8	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - Characterization of Vegetation, Wildlife, and Wildlife Habitats	Exhibit 22 - Terrestrial Ecology and Wetlands	Pg 97-98 Amphibians and Reptiles and Terrestrial Invertebrates Reference is made to onsite surveys to be conducted in 2016. NYSDEC is unaware of any such surveys, and it is unclear what types of surveys are intended. NYSDEC requests copies of work plans and any other material related to wildlife, habitat, and ecological surveys planned for 2016.	When discussing Amphibians and Reptiles, the PSS (page 97) states "...However, reptiles and amphibians documented during other onsite surveys in 2016 will be recorded." When discussing Terrestrial Invertebrates, the PSS (page 98) states "The Article 10 Application will provide a description of the groups of terrestrial invertebrates likely to occur within the Facility Site based upon available habitat and observations made during other onsite surveys in 2016." The Applicant will conduct a rare plant survey and wetland/stream delineations during the growing season of 2016, as described in PSS Sections 2.22(f) and 2.22(i), respectively. No surveys are proposed for Amphibians, Reptiles, or Terrestrial Invertebrates; however, onsite habitat will be discussed and incidental observations will be reported in the Application.

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9	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - Impacts to Vegetation, Wildlife, Wildlife Habitats, Wildlife Travel Corridors, and Protected Species	Exhibit 22 - Terrestrial Ecology and Wetlands	Wildlife Travel Corridors: Since the 2008 and 2009 diurnal bird movement studies at the Hounsfield Wind project were conducted, state listed threatened common terns began nesting on Little Galloo Island. Without an opportunity to review the 2015 studies, NYSDEC cannot evaluate the potential impacts of the project to this species, or agree with the statement that "no significant impacts to travel corridors are anticipated".	The bird studies have been submitted by the applicant.
10	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - Impacts to Vegetation, Wildlife, Wildlife Habitats, Wildlife Travel Corridors, and Protected Species	Exhibit 22 - Terrestrial Ecology and Wetlands	Threatened, Endangered, and Protected Species: When referencing and evaluating New York State Species of Greatest Conservation Need (SGCN) in this section and all others of the Application, the SGCN list found in the 2015 State Wildlife Action Plan (SWAP) should be used. The SWAP is available at: <a href="http://www.dec.ny.gov/animals/7179.html">http://www.dec.ny.gov/animals/7179.html</a>	Comment noted. The Article 10 Application will reference this list.
11	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - Impacts to Vegetation, Wildlife, Wildlife Habitats, Wildlife Travel Corridors, and Protected Species	Exhibit 22 - Terrestrial Ecology and Wetlands	It should also be noted that an Incidental Take Permit may be needed for unavoidable impacts to state-listed species as a result of construction and operation of the project, per 6 NYCRR Part 182.	Comment noted. Section 2.32 of the PSS identifies Incidental Take Permits as a State Permit which may be required for the Construction and Operation of the Facility but for the Article 10 process. Any substantive provisions of applicable State approvals and permits will be presented in Exhibit 32 of the Application, including any substantive provisions contained as part of the Article 11 process per 6 NYCRR Part 182.
12	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - For Proposed Wind-Powered Facilities	Exhibit 22 - Terrestrial Ecology and Wetlands	DEC requests that reports describing of all 2015 survey work be submitted as soon as possible, prior to the Article 10 Application, to facilitate a timely review and opportunity to provide feedback on the results. As indicated in the PSS, all 2015 bird and bat reports have been completed, and therefore should be ready to provide to resource agencies without further delay.	These reports have been submitted by the Applicant.
13	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands - Wetland Impacts	Exhibit 22 - Terrestrial Ecology and Wetlands	The second sentence of this section indicates that "It is assumed the turbines themselves will be sited outside of wetlands...", however Figures 3 and 5 appear to show three proposed turbines sited in wetlands and several others in wetland adjacent areas. Wetland impacts should be avoided if possible.	Figures 3 and 4 present a preliminary layout that was developed using publically available information (i.e., NYSDEC Wetland data, previously prepared delineation data). Project facilities were sited to minimize impacts to wetland resources; however, wetland delineation updates are underway as of July 11, 2016, and any wetland impact discovered from field study will be reviewed, minimized through micro-siting, and permitted as appropriate if necessary. The Applicant will identify the specific location of project components (including delineated wetland boundaries) in the Article 10 Application. All wetland impacts and minimization/avoidance measures will be presented in Exhibit 22(m) and (n).
14	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.23	Section 2.23 - Water Resources and Aquatic Ecology - Surface Waters	Exhibit 23 - Water Resources and Aquatic Ecology	Pg. 109, in the first full paragraph the PSS states; "The Facility Site lies within the Lake Ontario drainage basin (USGS Hydrologic Unit 4150200) ..." The correct 8-digit Hydrologic Unit Code (HUC) for Lake Ontario is 04150200. There are no odd numbered HUC's used by the USGS. For more information on the proper usage of HUCs please visit the following website: <a href="http://nhd.usgs.gov/wbd_facts.html">http://nhd.usgs.gov/wbd_facts.html</a>	Comment noted. The Article 10 Application will include the proper usage of HUC's (i.e., change the stated HUC of 4150200 to 04150200).
15	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.23	Section 2.23 - Water Resources and Aquatic Ecology - Surface Waters	Exhibit 23 - Water Resources and Aquatic Ecology	Pg. 109, in the second full paragraph, the PSS states; "Lake Ontario is an important habitat for a number of fish and aquatic species, and provides sportfishing for walleye, smallmouth bass, largemouth bass, brown trout, Chinook salmon, Coho salmon, Atlantic salmon, northern pike, and a stocked lake trout population." - Lake Ontario also provides excellent opportunities to fish for Steelhead or Steelhead Salmon (a migratory form of the Rainbow Trout).	Comment noted. The Article 10 Application will include reference to these additional fish species.

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16	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.23	Section 2.23 - Water Resources and Aquatic Ecology - Surface Waters	Exhibit 23 - Water Resources and Aquatic Ecology	<p>Pg. 109, in the second full paragraph, the PSS also states; "The most significant concerns for impacts to fish and aquatic species from construction of the Facility would arise during construction of the docking facilities and water intake line."</p> <p>- A comprehensive study of aquatic species which may be affected by the construction of the docking facilities and water intake line will be needed to adequately assess any potential impacts the construction of this facility may have.</p> <p>- Blasting, if needed for the docking facility/barge landing, could have significant effects on the aquatic environment especially the Significant Coastal Fish and Wildlife Habitat around nearby Little Galloo Island and Stony Island.</p>	When discussing aquatic impacts, the Findings Statement for the Hounsfield project states "Before blasting, the Project Sponsor will conduct an aquatic survey in conjunction with a detailed geotechnical investigation. These surveys and investigations will gather important baseline data as to the current condition (prior to blasting or construction), and this data will be used by the aquatic ecologist performing the monitoring of the blasting and excavation as well as by the Blaster-In-Charge in designing the final detailed blasting plan." The Applicant intends to submit preliminary geotechnical and blasting plans in support of the Article 10 Application (pg. 159 of the PSS). If blasting for the docking facility is required, additional studies of aquatic species will be provided (pg. 109 of the PSS) and referenced in the final plans and final blasting plan. Additional aquatic studies will be implemented for the construction of the water intake as needed.
17	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	NA	General Comment - Avian Surveys	NA	<p>Upon completion of avian surveys, it is highly recommended that all maps associated with the results of avian surveys include the following information:</p> <ul style="list-style-type: none"> <li>- The project boundary</li> <li>- The proposed layout of each wind tower/turbine</li> <li>- The Breeding Bird Survey (BBS) and Diurnal Bird Movement Survey (DBM) observation transects/points</li> <li>- Results of the BBS and DBMS showing the date, location, and behavior of each individual endangered, threatened and special concern species observed</li> <li>- The layout of roads, electric interconnection and transmission lines, etc.</li> <li>- Any state or federal lands on Galloo Island shall also be displayed</li> <li>- Regulated wetlands</li> <li>- All associated infrastructure (e.g. buildings, laydown areas, parking areas, borrow pits or areas, batch plant, docking areas, helicopter landing pad, etc.)</li> </ul>	The requested information will be included in the Article 10 Application.
18	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	NA	General Comment - Significant Coastal Fish and Wildlife Habitat	NA	<p>Galloo Island is in close proximity to Little Galloo Island and Stony Island which are both listed by the New York State Department of State as having Significant Coastal Fish and Wildlife Habitat.</p> <p>Recommendation: The Galloo Island Wind Energy Facility should evaluate the potential impacts this project may have during construction, operation, maintenance, and potential decommissioning of the facility on the nearby Significant Coastal Fish and Wildlife Habitat of Little Galloo Island and Stony Island.</p>	As part of the SEQRA review of the Hounsfield project, it was previously found by the NYSDEC that the habitats associated with Little Galloo Island and Stony Island "will not be impacted by the construction or operation of the wind generation project on Galloo Island". The Applicant anticipates a similar lack of impact to these island habitats, but will assess the potential impacts to Little Galloo Island and Stony Island resulting from potential changes from the previous project to the current proposal. This will be completed using previously prepared studies and publically available information regarding Little Galloo and Stony Islands and these findings will summarize in Exhibit 22 of the Article 10 Application.
19	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	Figures	Figure 3.0 - Preliminary Facility Layout	Exhibit 3 - Location of Facilities	<p>The Barge landing area for the Galloo Island Wind Energy Facility has moved to the northeast tip of Galloo Island in substantially shallower water as compared to the original Hounsfield Wind Farm Project as depicted in Figure 3.0. The NYSDEC respectfully requests reasoning and justification for this new location for the Barge Landing and a determination as to whether blasting of the bottom and shoals of Lake Ontario will be necessary to construct the Barge Landing.</p>	The governing depth for barge operations is approximately 10 feet. Therefore, the relevant criteria for comparing the location of potential barge landing operations is the distance between the shoreline and the 10 foot contour. This distance is similar between the two sites; however, the 6 foot contour for the proposed landing site is substantially closer to the shoreline, indicating the nearshore area is actually deeper at the proposed site. The reason for choosing the proposed location is a combination of bathymetry and exposure to weather. The proposed location is actually to the northeast of the pronounced shoal which defines Gil Harbor. The need for any blasting is still to be determined, however any blasting requirement at the proposed location would be dramatically less than what the Hounsfield project had proposed where more than 20,000 cubic yards of rock below mean high water was proposed to be blasted and removed.

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20	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	Figures	Figure 3.0 - Preliminary Facility Layout	Exhibit 3 - Location of Facilities	The location of the Interconnect Lines are directly below the Access Road which is contrary to the original Hounsfield Wind Farm Project and could be problematic during times of repair for either the Access Roads or the Interconnect Lines.	The figures included in the PSS are preliminary and were not intended to indicate precise locations of the proposed facilities. The collection lines are actually anticipated to run adjacent and parallel to the road system. The Applicant will identify the location of project components in detail in the Preliminary Design Drawings (Exhibit 11) in the Article 10 Application.
21	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands	Exhibit 22 - Terrestrial Ecology and Wetlands	The Galloo Island Wind Energy Facility's Preliminary Scoping Statement fails to mention the importance of the Atlantic flyway for migratory birds and raptors (found at the following URL: <a href="https://www.fws.gov/birds/management/flyways.php">https://www.fws.gov/birds/management/flyways.php</a> ) and the presence of Galloo Island within this major migratory corridor. The Project Area may also contain habitat utilized by the federally and state-listed endangered Indiana bat ( <i>Myotis sodalis</i> ) as well as the federally and state-listed threatened northern long-eared bat ( <i>Myotis septentrionalis</i> ) which could potentially reach this island in the summer months. Given the Project area's importance to wildlife species on the broader landscape, consideration should be given to the cumulative impacts of this project on bird and bat species and their habitats with respect to the other wind energy projects that are currently operating and proposed to be constructed in the Lake Ontario/St. Lawrence River plains area. The potential for cumulative impacts to bird and bat species and their habitats from all of the projects in this region may be exponentially raised to serious levels.	The Article 10 Application will discuss the Atlantic flyway as appropriate; however, the Applicant notes that the project site makes up an incredibly small portion of the flyway and no impacts are anticipated to the flyway in particular. With respect to cumulative impacts to be addressed within the Eastern Lake Ontario and St. Lawrence River plains (see Attachment A), the Applicant looks forward to working with DPS and NYSDEC staff to determine the exact parameters of the cumulative evaluation. Surveys to assess protected bat species were undertaken and reports have been provided to NYSDEC for evaluation.
22	Stephen Tomasik, New York State Department of Environmental Conservation June 21, 2016	6/21/2016	NA	General Comment	NA	Due to the significant characteristics and environmental settings of this island (as mentioned in the 2006 NYSOSCP, 2009 NYSOSCP, and the Draft 2014 NYSOSCP as a Priority Project numbers 129, 89, and 128 respectively), NYSDEC highly recommends thorough wildlife, habitat, and wetland pre-construction surveys be conducted on site and in the surrounding area over multiple years and during all seasons, following the most recent USFWS and NYSDEC guidance. It is recommended that regional and local expert knowledge also be incorporated into the study design. The study design should include survey work that characterizes the use of the area by migrating, breeding, and wintering bird and bat species, and identifies the potential impacts from the project on them. A multi-year post-construction study evaluating the direct and indirect impacts of the operating project on bird and bat species should also be developed in consultation with USFWS and NYSDEC.	The Applicant has participated in several meetings with the NYSDEC to discuss existing avian and bat studies completed for the project and agree on additional studies completed in 2015. Per these discussions and correspondence, work plans were developed (as outlined in section 2.22 and Appendix F of the PSS) and implemented accordingly. The result of the recent 2015 studies have been provided to the NYSDEC. The Applicant will meet with NYSDEC to review these studies. A post construction monitoring plan will be incorporated into the Article 10 application.
23	Gale A. Stone Stoney Cove, Henderson Harbor June 22, 2016	6/22/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands -	Exhibit 22 - Terrestrial Ecology and Wetlands	I am writing to oppose the wind farm on Galloo Island. As co-owner of shore property in Henderson Harbor which recently received conservation easement status, in no small part due to the need to protect habitat for migratory birds, I find it antithetical at best and schizophrenic at worst for New York State to push through this wind farm which will exert such destruction upon these very migratory birds it seeks to support by granting this conservation easement. C'mon, New York: you can do better than this!	Comment noted. As indicated in PSS Section 2.22, potential wildlife impacts (including avian impacts) will be addressed in the Article 10 Application.
24	Thomas A. Pohl Deputy Counsel New York State Office of General Services Mayor Erastus Corning 2nd Tower, Governor Nelson A. Rockefeller Empire State Plaza, Albany, NY 12242 June 22, 2016	6/22/2016		General Comment		Commissioner RoAnn M. Destito has asked me to respond to your letter dated May 25, 2016 advising this office of the planned filings with the Department of Public Service regarding the wind energy project on Galloo Island in Lake Ontario. We will follow the proceedings of the New York State Board on Electric Generation Siting and the Environment, to determine if any State lands under this Agency's jurisdiction are affected by the wind turbine project. Thank you for the status update.	The Applicant appreciates your comment and interest in this project.

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25	Thomas Crandall June 23, 2016	6/23/2016	2.24	Section 2.24 - Visual Impacts -	Exhibit 24 - Visual Impacts	I oppose the windmill project as my view from my 110 year old cottage will be looking directly west at the windmills instead of the beautiful lake, islands and sunsets. From enjoying the islands for years from boating, fishing, and visiting, this project does not belong in one of the most enjoyable spots in the eastern Lake Ontario area.	Comment noted. As discussed in Section 2.24, the Article 10 Application will include a Visual Impact Assessment (VIA) which will be used to determine the extent and assess the significance of Facility visibility. The components of the VIA will include identification of visually sensitive resources, viewshed mapping, confirmatory visual assessment fieldwork, visual simulations (photographic overlays), visual impact evaluation, and review of potential visual impact mitigation measures.
26	Alexander W James June 23, 2016	6/23/2016	2.24	Section 2.24 - Visual Impacts -	Exhibit 24 - Visual Impacts	I am opposed to the Galoo Island Wind Project for several reasons #1 View shed, while I will not see it from my home, I will see it from the NYS scenic overlook on Rt 3, and from all 3 of the NYS State Parks on the Rt 3 corridor--I will also be faced with seeing it while sailing and fishing in the area #2 I have found it very difficult to navigate at night as the red strobe lights make it impossible to locate all other navigation beacons ( Wolf Isl. taught me that lesson).	Comment noted. As discussed in Section 2.24, the Article 10 Application will include a Visual Impact Assessment (VIA) which will be used to determine the extent and assess the significance of Facility visibility. The components of the VIA will include identification of visually sensitive resources, including NYS Parks, NYS Scenic Resources and locally sensitive resources, viewshed mapping, confirmatory visual assessment fieldwork, visual simulations (photographic overlays), visual impact evaluation, and review of potential visual impact mitigation measures. The Applicant will also coordinate with the FAA regarding lighting and will attempt to minimize adverse effects to extent practicable.
27	Alexander W James June 23, 2016	6/23/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands -	Exhibit 22 - Terrestrial Ecology and Wetlands	#3 This is not only a scenic area but a major "wildlife "flyway"- there is a significant swan population, (over 20), at North Pond ( part of Galoo Isl.), they will be slaughtered by the wind blades that rotate at over 100 mph at the tips.	Comment noted. As indicated in PSS Section 2.22, potential wildlife impacts (including avian impacts) will be addressed in the Article 10 Application.
28	Alexander W James June 23, 2016	6/23/2016		General Public Comment	NA	#4 I do not want to subsidize a failed industry- Wind power is 50 years away from being economical. #5 I am not opposed to Green- My son runs a large environmental co. James Environmental. Lets use Galoo for Solar Energy or better yet a wildlife sanctuary.	Comment noted.
29	Susan Dudley June 24, 2016	6/24/2016		General Public Comment	NA	Honorable Secretary Burgess, I am writing to let you know of my opposition to this project. To allow an industrial wind 'factory' to be placed around Galloo Island is a disgrace for many reasons. However the main one is that industrial wind turbines are not a reliable source of electricity..period. They operate at best at 30% of their rated capacity ..please keep that in mind when reading the literature provided by the wind developers. To destroy one of NY states most treasured locations in order to provide a miniscule amount of electrical generation seems ridiculous to me. The destruction caused to wildlife habitat is permanent. The ruination of touristic appeal is permanent. The loss of revenue to businesses is permanent. The loss of property value to current residents is permanent. It is beyond me why New York state has decided to turn the shoreline of one of the worlds greatest sources of fresh water into an industrial wind wasteland. Please deny this application. It is not environmentally compatible with anything! There is no public need for this project especially in the area it is proposed.	Comment noted. the Article 10 Application will address the estimated capacity factor of the proposed Facility, and wildlife and socioeconomics impacts as outlined in PSS Section 2.8(a)(3), 2.22, and 2.27 respectively.
30	Antionette R. Cade Special Assistant United States Section International Joint Commision Canada and United States 2000 L St. NW, Suite 615 Washington, DC 20036 June 24, 2016	6/24/2016		General Comment		Thank you for your letter of June 2. 2016, regarding your intention to file the Article 10 Preliminary Scoping Statemnt (PSS) in the near future, which I have shared with the International Joint Commission (IJC) Commisioners and staff. Your outgoing interest in the IJC is appreciated. We would be pleased to provide any additional information that you require.	The Applicant appreciates your comment and interest in this project.

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31	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.2	Section 2.2 - Overview and Public Involvement - Brief Description of the Proposed Facility	Exhibit 2 - Overview and Public Involvement	The Village strongly feels that to minimize potential negative impacts on the Village, its inhabitants, guests and resources, that not only should these areas be addressed in the PSS and Application, but also in forming conditions imposed by the Siting Board in approving the Application. Therefore, the Village strongly disagrees with the first paragraph on Page 2 and Section 2.2 of the PSS, regarding the adverse potential impacts of off-site ancillary features on the mainland, as they cannot adequately be addressed under current state and local laws and regulations. The Village is a small community of about 1,500 residences and the major economic forces in the Village are tourism and hospitality. The Village is situated on the shores of Lake Ontario, and has two protected harbors and municipal and private facilities for embarking from the mainland into the navigable waters of Lake Ontario. Its streets are not designated for heavy traffic flows, repetitive heavy loads or oversized and overweight loads. There are no traffic control devices in the Village other than stop signs at intersections. The Village owns and maintains waterfront parks with deep water dockage and two boat launches, which are actively used by residents and guests to the Village.	The off-site ancillary features associated with this Facility generally consist of temporary parking, temporary access and embarkation. The off-site ancillary features as discussed in the PSS will be identified, described and assessed (in terms of potential impacts and proposed mitigation measures) in the Article 10 Application. However, off-site ancillary features (i.e., temporary parking, points of embarkation, etc.) are not subject to the Board's jurisdiction under PSL Article 10. The requested information will be included in the Article 10 Application and in the Route Evaluation and Transportation Impact Study.  Regarding the proposed off-site ancillary features proposed within the Village of Sackets Harbor, these are not anticipated to result in heavy traffic flows, repetitive heavy loads or oversized and overweight loads through the village. Nor is it anticipated that the project would utilize the Village deep water dockage or boat launches. The only project activity contemplated within the Village would be the use of the private Madison Barracks Marina for embarkation of construction workers and parking for construction workers which has been discussed with Madison Barracks facility management. It is anticipated that this temporary parking will be located within an Existing Planned Development District (PD)/Historic Overlay District and could be subject to Site Plan Review per §4-3 (E)(6)(b)(1) of the Village code.
32	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.25	Section 2.25 - Transportation	Exhibit 25 - Transportation	The use of the Village's core as an "ancillary feature" to this Project would be absolutely unacceptable, even though it is open and free to the public. The Village would want a condition to the Article 10 permit that this area of the Village may not be used in support of the Project. The current proposed points of embarkation and disembarkation are acceptable and should be part of the Application and a condition of any Article 10 permit granted. As part of the Application, the Project sponsor should set forth a Village's approved detailed site plan for parking on Madison Barracks with predicted traffic flows, timing based upon projected with real work sequences and frequency schedules. Compliance with the detailed plans and a restriction that no street in the Village may be used as a haul route should be made a condition of any Article 10 permit issued by the Siting Board.	The only project activity contemplated within the Village would be the use of the private Madison Barracks Marina for embarkation of construction workers and parking for construction workers which has been discussed with Madison Barracks facility management. It is anticipated that this temporary parking will be located within an Existing Planned Development District (PD)/Historic Overlay District and could be subject to Site Plan Review per §4-3 (E)(6)(b)(1) of the Village code.
33	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands	Exhibit 22 - Terrestrial Ecology and Wetlands	One potential ancillary concern using the Village as the point of departure and arrival by boat of the workers is the spread of pale swallow-wart to the Village. Galloo Island is infested with this invasive species. Therefore, part of the Application should include an invasive species control plan and be a condition of the Article 10 permit. The control plan should also set protocols for insuring workers and equipment to not carry any portion or seeds of pale swallow-wart to the Village inadvertently.	As stated in the PSS in Section 2.21(c) on page 85, 2.22(b) on page 94, 2.22(p) on page 107, and 2.23(e)(2) on page 114 the Article 10 Application will include an Invasive Species Control Plan (ISCP). Specific to Pale Swallow-wort, and as stated in PSS Section 2.21(c) on page 85, the ISCP will build off of the Pale Swallow-wort Control Plan that was approved by the NYSDEC during the SEQRA review for the Hounsfield Wind Farm Project. This plan puts into place specific actions for sanitation of machinery and workers prior to leaving or entering the island.
34	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.18	Section 2.18 - Safety and Security	Exhibit 18 - Safety and Security	The Village provides Fire Protection, Emergency Medical Services and Ambulance Services to the Town of Hounsfield through the Village's Fire Department. Due to the Project's location on Galloo Island and the fact that the Village's Fire Department does not possess any boats or aircraft, providing fire, emergencies, medical and ambulance services to the Project site presents unique challenges. The Village believes that as part of the Application and conditions to any Article 10 Permit issued, there must be plans for fire protection, safety, security and emergency services that have been approved by and coordinated with the Village Board of Trustees and the Fire Council of the Village's Fire Department. These should include a division of responsibilities with appropriate covenants between the owners of the Project and the Village's Fire Department and Village. In addition, the Plan should provide for the transportation of sick	Based on prior discussions, the Applicant understands that the Village does not currently provide emergency services to Galloo Island given the remote location. The Applicant does not expect that this situation will change as a result of the project and will continue to consult with the Village Emergency Services department and other regional emergency services providers to develop a comprehensive Emergency Action Plan to be included in the Article 10 Application.

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						and injured persons from the Project site to the appropriate medical facilities on the mainland.	
35	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.24	Section 2.24 - Visual Impacts	Exhibit 24 - Visual Impacts	The Village believes the PSS to be deficient in addressing the proposed projects potential impacts on cultural, historic and coastal resources and the manner or methods to mitigate or offset the adverse visual and practical impacts on those resources of immense value to the Village.	EDR submitted a Cultural Resources Work Plan to NYSOPRHP on June 3rd, 2016. The work plan specified that EDR will prepare an analysis of the potential visual effect of the Facility on properties previously determined by NYSOPRHP to be NRHP-eligible, including consideration of distance and the effect of vegetation and other landscape features that may screen or minimize views of the Facility from historic resources. The visual effects analysis will specifically address impacts from the NRHP-listed key receptors previously identified by NYSOPRHP in the June 23, 2009 letter (including Sackets Harbor Battlefield, Madison Barracks, and Sackets Harbor Village Historic District), and include visual simulations where appropriate in response to NYSOPRHP concerns regarding impacts to these concentrations of historic resources. The report will also include a discussion of mitigation efforts based on a review of previous recommendations for mitigation of visual impacts to historic resources found in the SEQRA Findings Statement (NYSDEC, 2010). The historic resources visual effects analysis will be provided to NYSOPRHP via the Cultural Resource Information System (CRIS) website and provide the basis for the evaluation of potential visual effects on historic resources included in Exhibit 24 of the Article 10 Application. The completed Historic Architectural Resources Visual Effects Analysis will be submitted as part of the Article 10 Application. NYSOPRHP provided a response on July 1st, 2016 indicating their concurrence with the Work Plan as proposed by EDR, which is included as Attachment B.
36	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.24	Section 2.24 - Visual Impacts	Exhibit 24 - Visual Impacts	The PSS recites that the Applicant will consult with and coordinate with New York State Department of State Office of Parks, Recreation and Historic Preservation for conducting the necessary studies and analysis of visual impacts and offset measures on historic properties and resources. There is no mention of said coordination and consultation with the Village.	The Applicant will be consulting with local stakeholders and municipalities. As stated in 2.24(a)(11) of the PSS "...the Applicant will engage in outreach with local stakeholders and municipalities to identify additional visually sensitive resources of local significance within the 15-mile study area. These areas are anticipated to include places of concentrated activity such as village centers and heavily used roadways, or landscapes of high aesthetic merit that may be considered important by local residents." In addition, PSS Section 2.24(b)(4) states, "The consultation process with municipal planning representatives is anticipated to take place during the summer of 2016. Specifically, the Applicant will prepare a Visual Outreach Letter, which will 1) introduce the Facility, 2) provide information on the Article 10 process, 3) identify the Facility's Visual Study Area, 4) present the results of a preliminary viewshed analyses and a preliminary desktop inventory of visually sensitive resources, 5) and a summary of the process by which viewpoints are selected for preparation of visual simulations. Finally, the Visual Outreach Letter will request feedback to assist in the identification of important or representative viewpoints." The consultation process referenced in Section 2.24(b)(4) of the PSS will take place in the summer of 2016.
37	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.20	Section 2.20 - Cultural Resources	Exhibit 20 - Cultural Resources	The proposed project differs from the previous Galloo Island Wind Farm proposal in one material respect. The new proposal towers are 164 feet taller than those previously proposed. Therefore, the visual impact on mainland historic resources is greater and more prevalent. In addition there has been a new site placed in the area on the National Register of Historic Places since the original Galloo Island Wind Farm proposal. The Village desires to be consulted on and coordinated with the proposed visual impact studies prior to the Application being finalized. Obviously, the Village desires as a condition of the Article 10 permit, the required offset measures pursuant to Section 106 of the National Historic Preservation Act be coordinated with the Village .	The Applicant will be consulting with local stakeholders and municipalities. As stated in 2.24(a)(11) of the PSS "...the Applicant will engage in outreach with local stakeholders and municipalities to identify additional visually sensitive resources of local significance within the 15-mile study area. These areas are anticipated to include places of concentrated activity such as village centers and heavily used roadways, or landscapes of high aesthetic merit that may be considered important by local residents." In addition, PSS Section 2.24(b)(4) states, "The consultation process with municipal planning representatives is anticipated to take place during the summer of 2016. Specifically, the Applicant will prepare a Visual Outreach Letter, which will 1) introduce the Facility, 2) provide information on the Article 10 process, 3) identify the Facility's Visual Study Area, 4) present the results of a preliminary viewshed analyses and a preliminary desktop inventory of visually sensitive resources, 5) and a summary of the process by which viewpoints are selected for preparation of visual simulations. Finally, the Visual Outreach Letter will request

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							feedback to assist in the identification of important or representative viewpoints." The consultation process referenced in Section 2.24(b)(4) of the PSS will take place in the summer of 2016.
38	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.4	Section 2.4 - Land Use - Conformance with the Coastal Zone Management Act	Exhibit 4 - Land Use	The Environmental Impact and Findings Statement for the previous Galloo Island Wind Farm, not only addressed the States Coastal Management policies, but also those of the Village contained in its state approved local Waterfront Revitalization Program. The Village believes the Application needs to address all of the Project's impacts in light of its Local Waterfront Revitalization Program.	The Article 10 Application will address all NRHP listed and eligible places as stated in 2.20(b)(3) and 2.24(a)(1) of the PSS. As stated above, and in the PSS, the Applicant will be consulting with local stakeholders and municipalities to identify visually sensitive resources of local significance. Regarding the potential viewshed of the proposed Facility, the Applicant has developed a preliminary viewshed analysis (see Attachment C) of the preliminary layout in relation to the previously prepared viewshed analysis for the Hounsfield project. While there appears to be increase in the area of the viewshed, at higher elevations, there are minimal changes to the shoreline area. The viewshed assessment of the proposed Facility, along with the broader assessment of visual impacts will be fully addressed in the Article 10 Application as indicated in section 2.24 of the PSS. Comment noted. The Article 10 Application will provide an analysis of the Facility's conformance with relevant provisions of the Coastal Zone Management Act and any local waterfront revitalization programs.
39	Dennis Whelpley Village Attorney [Village of Sackets Harbor] Conboy, McKay, Bachman, Kendall, LLP 407 Sherman Street Watertown, NY 13597 June 24, 2016	6/24/2016	2.3	Section 2.3 - Location of Facilities - Municipal Boundary Maps	Exhibit 3 - Location of Facilities	Finally, it should be noted that the proposed source of the location of municipal boundaries are inaccurate as listed in Section 2.3(b) of the PSS. The accurate municipal boundaries are set forth in the original legislation creating the townships and referral should be made to the Legislative Acts for accurate boundaries.	Comment noted.
40	Anthony & Cara Dibnah June 24, 2016	6/24/2016	2.28	Section 2.28 - Environmental Justice	Exhibit 28 - Environmental Justice	Environmental Justice is not noted in the PSS, Galloo Island is now eligible to be classified as an environmental justice area. Apex should be required to perform the necessary survey as required by DEC.	Environmental Justice is specifically addressed in PSS Section 2.28. Galloo Island is not an environmental justice area as defined by 6 NYCRR Part 487.
41	Anthony & Cara Dibnah June 24, 2016	6/24/2016	2.24	Section 2.24 - Visual Impacts	Exhibit 24 - Visual Impacts	Not noted in the PSS that requires specific actions to correct the view-shed from the lighthouse. The 60ft tower gives a view of the entire Island that if the project goes through will now be dwarfed by 600ft turbines past my lifetime. National Registers of Historic Places were identified within the survey area (including the former coast guard station and lighthouse on Galloo Island). In a letter dated June 23, 2009, SHPO specifically identified historically significant resources that may be impacted by the Project: the Galloo Island Lighthouse Complex, However, SHPO concluded under the standard established pursuant to Section 14.09 of the New York State Parks and Recreation Law and Section 106 of the National Historic Preservation Act (not SEQRA) that the Project would have an "Adverse Impact" within the APE surveyed due to the visual impact of the turbines on the recreational shoreline vistas and historic resources, albeit at a distance of 1000 ft. From the lighthouse "The visible turbine field will forever (or until any decommissioning may occur) alter what has been a largely intact historic vista for more than two centuries." SHPO concluded that "Given the unique circumstances associated with this portion of the Project (turbine field development) we see no reasonable way in which the affects associated with the construction of these units on Galloo Island can be avoided or minimized through layout alteration or unit number reduction." The National Park Service has noted that wind farm locations be removed from areas of the field of view of lighthouses <a href="http://www.boem.gov/National-Park-Service-Comments-on-Visibility-Study-NY/">http://www.boem.gov/National-Park-Service-Comments-on-Visibility-Study-NY/</a>	EDR, Galloo Island Wind's environmental and design consultant, submitted a Cultural Resources Work Plan to NYSOPRHP on June 3rd, 2016. The work plan specified that EDR will prepare an analysis of the potential visual effect of the Facility on properties previously determined by NYSOPRHP to be NRHP-eligible, including consideration of distance and the effect of vegetation and other landscape features that may screen or minimize views of the Facility from historic resources. The visual effects analysis will specifically address impacts from the NRHP-listed key receptors previously identified by NYSOPRHP in the June 23, 2009 letter (including the Galloo Island Light House Complex), and include visual simulations where appropriate in response to NYSOPRHP concerns regarding impacts to these concentrations of historic resources. The report will also include a discussion of mitigation efforts based on a review of previous recommendations for mitigation of visual impacts to historic resources found in the SEQRA Findings Statement (NYSDEC, 2010). NYSOPRHP provided a response on July 1st, 2016 indicating their concurrence with the Work Plan as proposed by EDR, and no additional architectural surveys would be required. Potential impacts to NRHP-listed or eligible resources on Galloo Island were not specifically identified in this letter, which is included as Attachment B. Regarding the December 23, 2015 document provided by the commenter entitled "NPS Comments on the Visibility Study Conducted for a Hypothetical Wind Energy Project on the Outer Continental Shelf, Offshore New York," these comments from the National Park Service (NPS) were in response to the potential impacts on units of the National Park system and National Historic Landmarks (NHLs) from a hypothetical offshore wind project located along the Outer Continental Shelf in the vicinity of Long Island (full details available at: <a href="http://www.boem.gov/New-York-Visual-Simulations/">http://www.boem.gov/New-York-Visual-Simulations/</a> ). Therefore, the NPS comments in the provided letter are not

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							applicable to Galloo Island Wind. No NPS park units ( <a href="https://www.nps.gov/aboutus/upload/Site-Designations-06-24-16-2.pdf">https://www.nps.gov/aboutus/upload/Site-Designations-06-24-16-2.pdf</a> ) or NHLs ( <a href="https://www.nps.gov/nhl/find/statelists/ny/NY.pdf">https://www.nps.gov/nhl/find/statelists/ny/NY.pdf</a> ) are located within the study area of Galloo Island Wind, nor is the NPS a consulting party for Galloo Island Wind. In addition, the NPS does not recommend in the provided letter that "wind farm locations be removed from areas of the field of view of lighthouses." An NYSOPRHP letter provided in response to the same hypothetical offshore wind project only noted that potential visual effects on the numerous NR-listed and NR-eligible properties will need to be evaluated" but did not specifically identify the potential impact to lighthouses ( <a href="http://www.boem.gov/NY-SHPO-letter-NY-visual-simulations/">http://www.boem.gov/NY-SHPO-letter-NY-visual-simulations/</a> ).
42	Anthony & Cara Dibnah June 24, 2016	6/24/2016	2.4	Section 2.4 - Land Use - Compatibility of the Facility with Existing and Proposed Land Uses	Exhibit 4 - Land Use	Easement to travel from Coast Guard Station to lighthouse. Not discussed in PSS. The easement to travel from the station to the lighthouse is now impaired by the installation of the industrial wind farm on what was called lighthouse RD and the interior of the Island. The original easement stated that travel was on no specific route.	PSS Section 2.31(a) states, "The Article 10 Application will include a tax parcel map of the Facility which clearly depicts the tax parcel ID, current land use and zoning, relevant easements, grants and related encumbrances." The specified easement which is referenced in this comment was for a specific purpose and duration and has been terminated.
43	Mr. Gunther Schaller June 25, 2016	6/25/2016		General Public Comment	NA	With two days remaining for the public comments to be accepted and fewer than a handful comments posted since the PSS was filed, the method established by the State to load the dice is working. The comments posted prior to the "official" comment period won't be considered, silencing all of us who have felt strongly enough to voice our opinions and concerns. To restrict comments to 21 days will avoid having to address concerns of municipalities, who won't even have a meeting to discuss the matter and deliberate a position. The changes in the proposed number of turbines, the height and the span of the blades alone has modified the project to the point where the State should have required the developer to file for a new project, since the changes are material and may alter the position of the parties previously neutral or in favor of the project. As the Brexit vote has shown, people will put up with being ignored and manipulated only for so long. It is time for the State to begin listening to its people. Whether is is fragile ecosystems or fragile economies, industrial wind has no place in this part of the State.	Comment noted. The Article 10 procedures have a variety of methods for public outreach and involvement integrated into the review process. For instance, a Public Involvement Program (PIP) Plan has been prepared and filed for this Facility. Additionally, there has been a public comment period for the PSS and there will be additional opportunities throughout the process.
44	Yvonne M. Bronson June 26, 2016	6/26/2016	2.24	Section 2.24 - Visual Impacts	Exhibit 24 - Visual Impacts	After review of the PSS recently submitted by APEX, it is woefully inadequate for such a major action. Great Lake Islands are very few in numbers, they should be protected. Little attention was placed on the massive viewshed alteration if this project proceeds. This area thrives on tourism as well as summer homes location, both will be drastically affected by 600 ft. wind turbines.	Comment noted. As indicated in PSS Section 2.24, potential visual impacts of the proposed project will be addressed in the Visual Impact Assessment which will be used to determine the extent and assess the significance of Facility visibility and appended to the Article 10 Application.
45	Yvonne M. Bronson June 26, 2016	6/26/2016	2.24	Section 2.22 - Terrestrial Ecology and Wetlands	Exhibit 22 - Terrestrial Ecology and Wetlands	There was also no mention of very strong potential of eagle kills, as they frequent this area. I am strongly opposed to this project and expect the above issue to be responded in APEX's future submittals. The only sensible use for Galloo Island that NYS should consider is Open Conservation, which would be very much in line with the other parks and recreation in this area.	Comment noted. As indicated in PSS Section 2.22, potential wildlife impacts (including avian impacts) will be addressed in the Article 10 Application.

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46	Cindy Grant June 27, 2016	6/27/2026	2.22	Section 2.22 - Terrestrial Ecology and Wetlands	Exhibit 22 - Terrestrial Ecology and Wetlands	I respectfully ask that you do not allow Apex or anyone else to install gigantic industrial wind turbines on Gallo Island. This area is such an important area for bird migration and these extremely large industrial wind turbines will kill many, many birds- including the eagles. In the last ten years we have seen more eagles that have been able to use the Lake Ontario area and the St. Lawrence shoreline to build their large nests and raise their young. The plentiful fish in Lake Ontario and the St. Lawrence river draw many birds. Some stay year round. Others use this area as a resting spot on their migrating path to their summer or winter homes. I was disappointed with the birds and bat studies for this proposed project. It seems that much time has passed since these studies were done. I believe the actual bird and bat count to be higher than reported. When we pass by this island in our boat we see a lot of birds using this island. Because this island doesn't have much year round human activity, the birds seem to gravitate to it, to raise their young and to enjoy the peace and quiet. Please make the trip to visit our area and this special corner of paradise before you make any decision. Please protect the birds, the eagles, the bats and our area.	Comment noted. As indicated in PSS Section 2.22, potential wildlife impacts (including avian and bat impacts) will be addressed in the Article 10 Application.
47	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	NA	General Comment	NA	In general, discussions of the scope of the project and its application materials should be expanded to include more detail on issue-specific statements beyond statements such as "the Article 10 application will include information on" a topic.	Comment noted.
48	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	NA	General Comment	NA	The PSS includes various descriptions of the Project and the Facility, which are not consistent and should be clarified to distinguish the Article 10 Siting Board jurisdictional "Generating Facility" from the Article VII Public Service Commission jurisdictional "Major Transmission Facility." The PSS also fails, however, to acknowledge the requirement of Public Service Law Article 10 to address cumulative impacts of the Generating Facility and related facilities including those of the Major Transmission Facility. See PSL §168.2 and §168.4.	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction. The Application will address cumulative impacts of the Facility and related facilities including those of the Major Transmission Facility pursuant to PSL §168.2 and §168.4. With respect to cumulative impacts to be addressed in accordance with PSL Article 10, the Applicant looks forward to working with DPS staff to determine the exact parameters of the cumulative evaluation (i.e., cumulative assessment of viewshed).
49	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	NA	General Comment	NA	This lack of distinction between the Generating Facility and the Transmission Facility is most evident in the descriptions of the "collection substation" in PSS section 2.2 (a) at page 12, the description describes the Generating Facility collection substation as "including the main power transformers." PSS section 2.2(a) at page 13 describes the "low side of the collection station (i.e., 34.5 kV)" as part of the Article 10 Generating Facility; and "the "high side" of the collection station (i.e., 145 kV)" as part of the Article VII Major Transmission Facility. Section 2.3(a)(2) on page 16 states that "the point of interconnect ("POI") is subject to Article VII of the PSL, and therefore will not be evaluated in the Article 10 Application."	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction.
50	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	NA	General Comment	NA	DPS advises that the main power transformers should be considered part of the Article VII Major Transmission Facility. DPS further advises that Public Service Law (PSL) §168.2 and §168.4 requires that the Siting Board make explicit findings regarding the nature of the probable environmental impacts of the construction and operation of the Generating Facility, "including the cumulative environmental impacts of the construction and operation of related facilities such as electric lines...waste water or other sewage treatment facilities, communications and relay facilities" etc. on a range of environmental and other considerations as listed at §§PSL 168.2 (a)-(d).	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction. The Application will address cumulative impacts of the Facility and related facilities including those of the Major Transmission Facility pursuant to PSL §168.2 and §168.4. With respect to cumulative impacts to be addressed in accordance with PSL Article 10, the Applicant looks forward to working with DPS staff to determine the exact parameters of the cumulative impact evaluation.

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50	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	NA	General Comment	NA	The Scoping Documents should reflect the jurisdictional distinction of Project components, including details as described above, and also reflect the need for identification of cumulative impact assessments of both the generating and transmission components. Specific comments below will identify specific concerns and recommendations in this regard. (An example of cumulative impact assessment would be that the substation be represented in visual simulations of the Wind Energy Facility).	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction. The Application will address cumulative impacts of the Facility and related facilities including those of the Major Transmission Facility pursuant to PSL §168.2 and §168.4. With respect to cumulative impacts to be addressed in accordance with PSL Article 10, the Applicant looks forward to working with DPS staff to determine the exact parameters of the cumulative impact evaluation.
51	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	1.1	Section 1.1 - Introduction - Project Description	NA	At page 1, the PSS states that the Facility Components will include, among others, "a permanent structure for proposed overnight accommodations." DPS advises that this component should be referred to as a "building" rather than a "structure."	Comment noted.
52	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Proposed Major Electric Generating Facility Locations	Exhibit 3 - Location of Facilities	At pages 15-16, the PSS lists Facility components that are to be mapped in the application, and refers to Figure 3 in the PSS as containing indications of several Project features. 1. DPS advises that the location of the "on-site generator" listed at 2.3(a)(1) is not shown on PSS Figure 3 - Preliminary Facility Layout; and that the location is not described in the PSS. A revised Figure 3 should be provided to advance proper scoping and development of stipulations.	A revised Preliminary Facility Layout Figure 3 is included as Attachment D.
53	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Proposed Major Electric Generating Facility Locations	Exhibit 3 - Location of Facilities	Figure 3 - Preliminary Facility Layout, includes a proposed helicopter landing site. DPS requests clarification as to the intended use of helicopters for this Project. To advance Project scoping, please provide an explanation as to whether helicopters will be used on Galloo Island for aid during construction, for transporting components from the main land to the Project site, transport of personnel to and from the mainland on a regular basis, or otherwise. Further, if there will be a designated helicopter base on the mainland, provide the location on a map.	The principal mode of transportation to the island will be by boat. In the winter when conditions preclude navigation by water (i.e., ice) transportation is planned to be by helicopter to bring operations crew to and from the island. In addition, emergency medical care is planned to be provided by the Air Methods emergency medical helicopter. However, helicopters are not anticipated to support construction.
54	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Proposed Major Electric Generating Facility Locations	Exhibit 3 - Location of Facilities	Figure 3 - Preliminary Facility Layout, indicates the proposed location of the "Collection Substation" includes the main Access Road connecting the turbine arrays on the northerly and southerly sides of Galloo Island, as well as Collection Lines, all traversing the center of the Substation site. DPS understands that the site arrangement indicated is only preliminary, however, DPS advises Applicant to evaluate the arrangement to ensure the substation is not designed to include a through access road across the center of the site.	Comment noted. The figures provided in the PSS are preliminary. The revised Preliminary Facility Layout (Attachment D) indicates a revised substation layout/location. The specific location of project components will be presented in the Article 10 Application.
54	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Proposed Major Electric Generating Facility Locations	Exhibit 3 - Location of Facilities	Figure 3 - Preliminary Facility Layout, identifies the substation within the falldown zone for the nearest Wind Turbine located easterly of the Collection Substation. DPS recommends increasing the setback from an operating turbine to the critical substation components. DPS advises that the Public Service Commission has stipulated to a standard setback distance of 1.5 times maximum blade tip height from major transmission facilities, which would include the "high side" of the proposed Collection Substation. (See Case 07-E-0213, Sheldon Energy LLC, Order Granting Certificate of Public Convenience and Necessity and Providing for Lightened Regulation (issued January 17, 2008); note 5, page 12: "In the future, we may, as conditions warrant require a minimum setback distance of 1.5 times maximum turbine blade tip height from the edge of the right-of-way of any electric transmission line designed to operate at 115 kV or more.")	Comment noted. The Applicant will evaluate setbacks and potential shifts in component locations during design development and will include final locations in the Article 10 Application.
56	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Location of Ancillary Features	Exhibit 3 - Location of Facilities	Ancillary features should be described and assessed as part of cumulative assessment of the Project as required by PSL §168.2 and §168.4.	The off-site ancillary features associated with this Facility will be identified, described and assessed (in terms of potential impacts and proposed mitigation measures) in the Article 10 Application. However, off-site ancillary features are not subject to the Board's jurisdiction under PSL Article 10. Ancillary features will be described and

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							assessed as part of cumulative assessment of the Facility as required by PSL §168.2 and §168.4.
57	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Location of Article VII Transmission Lines Not Subject to Article 10	Exhibit 3 - Location of Facilities	The PSS notes that “[a]s currently conceived, the related transmission facility (RTF) includes the “high side” of the collection substation on Galloo Island, an approximately 30 mile AC underwater 145 kV transmission line, and a point of interconnection substation near the Mitchell Street Substation in Oswego, NY.” There is potentially inconsistent information regarding the voltages of the Project’s related facilities throughout the PSS. There are numerous references noting that the voltage of the underwater cable is 145 kV. However, at page 155, the PSS notes that the collection substation will include 34.5 (for collection lines) and 138 kV busses. DPS advises that applicant should confirm the configuration and design and operational voltages of the project facilities and related transmission facility.	Comment noted. The design voltage for the underwater cable will be 138 kV, and will be presented as such in the Article VII Application.
58	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Location of Article VII Transmission Lines Not Subject to Article 10	Exhibit 3 - Location of Facilities	DPS advises that the location of the Article VII transmission facility – both upland and in-water locations - within the area represented by Figure 3 - Preliminary Facility Layout should be provided in the Article 10 application as well as the Article VII application.	Comment noted. Such mapping will be provided in both applications.
59	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Study Area	Exhibit 3 - Location of Facilities	PSS at page 17 states “the study area for terrestrial ecological communities is essentially equivalent to Galloo Island.” Little Galloo Island is a nearby designated Significant Coastal Habitat, with resident avian species that also utilize areas of Galloo Island. This location should be included in terrestrial ecological community assessment and impact analysis for the Project.	The Applicant would like to discuss this comment with DPS noting that it was found by the DEC that “These habitats [Stony and Little Galloo] will not be impacted by the construction or operation of the wind generation project on Galloo Island” for the Hounsfield Wind project. The Applicant anticipates a similar lack of impact to these island habitats resulting from the current project, but will assess the potential impacts to Little Galloo Island and Stony Island resulting from potential changes from the previous project to the current proposal. This will be completed using previously prepared studies and publically available information regarding Little Galloo and Stony Islands and these findings will be summarized in Exhibit 22 of the Article 10 Application.
60	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.3	Section 2.3 - Location of Facilities - Municipal Boundary Maps	Exhibit 3 - Location of Facilities	DPS recommends use of municipal boundary data including appropriate underwater boundaries, for mapping and analysis of the project and identifying town and village boundaries in the Study Area in relation to the Project and Facility locations.	Comment noted. Such publicly available boundary data will be used in the Article 10 Application where appropriate.
61	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Map of Existing Land Uses	Exhibit 4 - Land Use	PSS states “[t]he Facility will be located on Galloo Island, which is approximately 6 miles from the mainland, therefore the evaluation of land uses will be limited to Galloo Island.” DPS advises that the use of waters surrounding Galloo Island must be included in the assessment of Land Use, including such uses as transportation (aircraft and watercraft uses), recreational boating, fishing, bird-watching, sight-seeing, and related uses in the Project Area and surrounding study area should be identified. The size of the Study Area for these uses should extend to the shoreline; and also include upland locations of ancillary features associated with the Facility as described in subsection 2.3(a)(3) on page 17.	While the ancillary features are not considered part of the “Facility Site”, Exhibit 4 of the Article 10 Application will include a brief discussion of land-use at these features (i.e., zoning, use, compatibility with local codes). The Applicant will review the size of the Study Area with DPS, but is not intending to complete broader, regional land-use studies associated with these ancillary off-site features.
62	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Map of Existing Land Uses	Exhibit 4 - Land Use	DPS advises that a more robust discussion of existing and recent uses of Galloo Island should be provided. Agricultural uses may need to be continued to continue support of resident wildlife populations. Transportation uses, including safe-harbor use of Gill Harbor, small aircraft landing and hanger facilities may need to be maintained. Recreational uses of harbor area and North Pond should be evaluated for sensitivity to proposed Facility development.	The Applicant recognizes there is private- and state-owned land on Galloo Island. However, the uses associated with these lands, as well as potential past agricultural uses, are not anticipated to be adversely impacted by the construction or use of this Facility. Exhibit 4 of the Article 10 Application will include an identification of current and (readily available) recent land uses and the Facility’s compatibility with such uses.

Comment Number	Commenter/Date	Date of Comment	PSS Section	PSS Section and Title	Corresponding Application Exhibit Number and Title	Comment (Per Commenter)	Applicant Response
63	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Map of Existing Land Uses	Exhibit 4 - Land Use	Land use on Little Galloo Island and Stony Island should be identified as these land areas are within the 5 mile basic study area.	Comment noted. Stony Island is a privately owned island; therefore, any information on land use for this island will be based on publicly available information
64	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Map of Existing Land Uses	Exhibit 4 - Land Use	DPS advises that the Scoping Document should be revised to identify other significant and related planning and resource use and protection documents.	PSS Section 2.4(i) identifies planning documents that will be evaluated in the Article 10 Application. Research will be conducted to identify additional planning documents; however, to the extent DPS staff is aware of others the Applicant would appreciate identification of such additional documents.
65	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Map of Existing Land Uses	Exhibit 4 - Land Use	Application will need to review New York State Open Space Plan (NYS OSP) for consistency of the Project land development proposal with NYS Priority Projects and objectives. The 2014 NYS Open Space Conservation Plan specifically identifies Open Space Conservation in the siting of energy generating facilities in DEC Region 6 (NYS OSP pg. A-140; NYS OSP, Appendix A, 2014). The NYS OSP identifies Lake Ontario and Lake Erie Shorelines, Island and Niagara River as a multi-regional Priority Project (OSP, pp. A-149 – 150). Galloo Island is specifically called out in the NYS OSP as “one of the undeveloped islands worthy of attention. (Id. at pg. 150). The Shorelines and Islands are also identified as a “scarce resource and represent natural habitats, scenic beauty and potential recreational areas.” (Id. at pg. A-152). Further, the NYS OSP specifically indicates that the “Open Space Conservation Objective” for the Lake Ontario islands is public recreation and protection from development” (Id. at pg. 170). DPS advises that the application should provide a robust review of NYS stated open space priority objectives, and compare proposed development with the “no action” alternative in terms of open space conservation and NYS OSP consistency.	The Application will provide a review of the NYS stated open space priority objectives in Exhibit 4, and also in the “no action” portion of Exhibit 9.
66	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Map of Existing Land Uses	Exhibit 4 - Land Use	The land use discussion should fully include and discuss uses in the vicinity of landing areas on the mainland that will be implicated in the transportation of component parts for construction, the transportation of construction and operational personnel and any provisions for emergency management.	Exhibit 4 of the Article 10 Application will identify land-uses adjacent to landing areas (i.e., Madison Barracks).
67	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Conformance with the Coastal Zone Management Act	Exhibit 4 - Land Use	DPS advises that the Scoping Statement should be revised to reflect the need to update analysis of the proposed land use with Coastal Area policies: the Application should not rely exclusively on previous determination by another agency. A prior determination by the NYS DEC that “the Hounsfield project ... is consistent with the State’s coastal policies” is not considered to be binding on any other State agency with the authority to approve, fund or directly undertake an action related to the project. 19 NYCRR Part 600.3(a) clearly states that no State agency shall approve an action until it has complied with the provisions of Article 42 of the NYS Executive Law. The Siting Board may find that its approval of the petitioners’ application for a CECPN complies, and does not conflict, with the policies and purposes of Article 42 independently of the findings of any other agency or any prior determination(s), whether the petitions are related or not. Where any Local Waterfront Revitalization Program (LWRP), approved the NYS Secretary of State exists, DPS Staff’s recommendation to the Siting Board will be consistent with the policies and purposes of the LWRP, in compliance with Article 42.	Commented noted. As stated on pg. 22 of the PSS, the Article 10 Application will provide an updated analysis of the changes between the previous projects and conformance of the proposed Facility with Coastal Area policies.
68	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.4	Section 2.4 - Land Use - Aerial Photograph Overlays	Exhibit 4 - Land Use	In addition to location of facilities, aerial photographs should provide indication of areas of proposed disturbance for project components.	The aerial photograph overlays provided in Exhibit 4 of the Article 10 Application will include approximate limit of vegetation clearing and approximate limit of soil disturbance based upon impact assumptions.

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69	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.5	Section 2.5 - Electric Systems Effects -	Exhibit 5 - Electric Systems Effects	As noted in comments above, description of the Related Transmission Facility does not mention upland high-voltage electric cable on Galloo Island or in Oswego. Likewise, PSL §168.2 requires cumulative impact information regarding the Project including the "Related Transmission Facility."	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction. The Application will address cumulative impacts of the Facility and related facilities including those of the Major Transmission Facility pursuant to PSL §168.2 and §168.4. With respect to cumulative impacts to be addressed in accordance with PSL Article 10, the Applicant looks forward to working with DPS staff to determine the exact parameters of the cumulative evaluation.
70	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.5	Section 2.5 - Electric Systems Effects - Notifications and Public Relations for Work in Public Right-of-ways	Exhibit 5 - Electric Systems Effects	PSS indicates that "there is no work anticipated in public right-of-ways" (pg. 28). DPS advises that the barge landing area and the entire underwater route of the proposed Related Transmission Facility will likely be located in publicly accessible waters, available for navigation and use for private recreation, commercial, research or other transportation, and will be subject to grant of easement from the State of New York. Notification of mariners, fishermen, and other Lake users of ongoing construction during cable installation is likely to warrant notification as well as permitting and construction plan review processes pursuant to PSL Article VII.	Comment noted. The Article 10 Application will identify activities to be conducted in locations accessible to the public, and discuss proposed notification measures.
71	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.5	Section 2.5 - Electric Systems Effects - Vegetation Management Practices for Substation Yards	Exhibit 5 - Electric Systems Effects	DPS advises that this topic should be also be addressed in the Article VII application.	Comment noted.
72	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.6	Section 2.6 - Wind Power Facilities - Manufacturer's Setback Specifications	Exhibit 6 - Wind Power Facilities	Setback specifications or recommendations or guidelines of wind turbine manufacturers should be specified, as well as any appropriate analysis criteria associated with site certification for specific turbines at a project location. Any setback distance guidance from water bodies should be provided.	The Applicant will obtain turbine manufacturer's recommendations and safety specifications related to setbacks, to the extent available.
73	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.6	Section 2.6 - Wind Power Facilities - Applicants Internal Setback Standards	Exhibit 6 - Wind Power Facilities	PSS states "this Facility does not have the typical set of constraints given its location on Galloo Island, well removed for occupied residences, etc." DPS advises that PSS identifies overnight residential accommodations that will be provided at existing residential structures and at the proposed O&M building. Consideration of those facilities and relevant worker safety requirements should be provided in developing project layout and design standards (e.g., setback distances, noise exposure, shadow flicker, etc.).	The Applicant is not proposing to construct permanent housing as a part of this Facility. As stated in Section 1.1 of the PSS, the Applicant intends to utilize an existing structure on Galloo Island and the proposed O&M building for potential overnight accommodations for operational staff during times of inclement weather. These buildings will not provide permanent housing, and it is not expected that workers will remain at these buildings for extended periods of time. The Applicant will develop mitigation measures regarding the O&M building and worker safety at the facility including measures to ensure OSHA compliance. These measures will be discussed in the Article 10 Application stated in Sections 2.15 and 2.18 of the PSS.
74	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.6	Section 2.6 - Wind Power Facilities - Applicants Internal Setback Standards	Exhibit 6 - Wind Power Facilities	Likewise, there are adjacent properties, including public lands, on Galloo Island that while unoccupied or undeveloped, are not under Applicant control. Responsible setback distances from property lines should be established.	Property line setbacks will be identified in the Article 10 Application. The Application will identify setback distances from adjacent unoccupied or undeveloped properties on Galloo Island as required or recommended by manufacturer's specifications, the Applicant's experience, and any applicable local laws or ordinances.
75	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.8	Section 2.8 - Electric System Production Modeling - Computer-based Modeling Tool	Exhibit 8 - Electric System Production Modeling	The PSS states on page 32 that "[t]he analyses presented in this section of the Article 10 Application will be developed using GEMAPS, PROMOD, or a similar computer-based modeling tool. Prior to preparing this exhibit, the Applicant shall consult with DPS and NYSDEC (to the extent necessary)" DPS advises that the phrase "to the extent necessary" should be deleted entirely, to address the intent of the regulation regarding consultation with DPS and NYS DEC. DPS advises the Applicant to consult early regarding Exhibit 8 and the contents thereof in the Application.	Comment noted. The Applicant will consult with DPS and NYSDEC regarding the requirements of Exhibit 8.
76	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.9	Section 2.9 - Alternatives - Public Health	Exhibit 9 - Alternatives	Subsection 2.9 (b)(9) states "[s]ince the Facility is sited on uninhabited Galloo Island and is approximately 6 miles from the mainland it is not expected to result in any public health concerns." DPS advises that the discussion of potential Public Health impacts in the PSS does not provide a sufficiently detailed basis to support the statement.	Comment noted. As stated in the Subsection 2.9(b)(9) PSS Section 2.15 provides additional details regarding public health concerns. Please see the Applicant's response to comments regarding Section 2.15 below. Due to the remote location of the island impacts to the general public are expected to be minimal.

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77	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.9	Section 2.9 - Alternatives - Alternative Turbine Layouts	Exhibit 9 - Alternatives	As noted in comments above, setback distances between turbines and the collector substation and O&M or worker residential facilities should be addressed, with alternative arrangements that minimize potential impacts.	The Applicant will review the applicable setbacks per DPS comments. Efforts to shift project components will be completed during design development and will be discussed in the Article 10 Application.
78	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.9	Section 2.9 - Alternatives - Alternative Turbine Layouts	Exhibit 9 - Alternatives	Consideration of recreational resources should recognize the traditional recreational uses of locations including North Pond, and potential use of the NYS DEC property adjoining the Facility Site, should be evaluated and alternative arrangements that minimize or avoid direct or significant indirect impacts should be considered. Offsite recreational uses such as sightseeing and use of NYS Parks and Historic Sites on mainland areas within the Project viewshed should be considered in evaluating alternative arrangements and alternative designs. Lighting, color and finish options should be identified, including use of RADAR-activated FAA aviation warning lights.	Consideration of recreational resources will discuss traditional recreational uses of the island and off-site areas within the viewshed.
79	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.9	Section 2.9 - Alternatives - Alternative Turbine Layouts	Exhibit 9 - Alternatives	Consideration of Cultural Resources impacts and alternative arrangements or designs should recognize the nearby historic resources on Galloo Island as well as sites with views to the Project Area. Measures to minimize impacts on Galloo Island Lighthouse, Sacketts Harbor State Historic Site, and other cultural resources, should be considered in alternative analysis.	Comment noted, consideration of Cultural Resources will be included in Exhibit 20.
80	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.10	Section 2.1 - Consistency with Energy Planning - Impact on Energy Policy	Exhibit 10 - Consistency with Energy Planning	DPS advises that the application should include a review of project consistency with the relevant goals, objectives and strategies of the current NYS PSC Clean Energy Standard policy and relevant program standards as adopted at the time the Application is submitted.	Comment noted. This review will be included in the Article 10 Application.
81	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.11	Section 2.11 - Preliminary Design Drawings - Site Plan	Exhibit 11 - Preliminary Design Drawings	DPS advises that the list of Facility components is not exhaustive of all relevant features and improvements that should be indicated on Site Plans, either at the major Facility site or off of Galloo Island.	See Attachment D Revised Figure 3: Preliminary Facility Layout. The Applicant will consult with DPS to identify missing relevant features or improvements.
82	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.11	Section 2.11 - Preliminary Design Drawings - Site Plan	Exhibit 11 - Preliminary Design Drawings	Additional drawings to show the layout of all offsite facilities and ancillary features are needed for this exhibit. While at PSS page 2 the applicant asserts that off-site ancillary features (i.e., contractor parking, docking improvements) are not considered to be part of the "Major Electric Generating Facility" and will not be part of the Article 10 Application, Staff disagrees with this statement, especially in regard to any laydown areas for construction equipment and wind turbine component storage prior to being hoisted by helicopter or transported by barge. Application should provide locational drawings of any designated areas to be used for construction equipment and oversized/overweight turbine components storage at the Port of Oswego, the Madison Barracks Marina, Henderson Harbor, Point Peninsula and any other potential laydown areas. DPS notes that 16 NYCRR §1001.11 (a) requires that "[a]dditional drawings shall be included depicting the layout of offsite facilities and ancillary features." Per this regulation, include drawings of all ancillary features, including but not limited to any laydown/marshalling yards, construction parking, docking improvements, etc. including any that are not located on Galloo Island.	The offsite ancillary features identified in the PSS are not considered part of the Facility as they are not located on site. However, per 16 NYCRR §1001.11, the Article 10 Application will include locational drawings which depict all off-site facilities and ancillary features.
83	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.11	Section 2.11 - Preliminary Design Drawings - Site Plan	Exhibit 11 - Preliminary Design Drawings	Due to the limited extent of areas on Galloo Island that are outside of the Facility Site Parcels, DPS recommends that the entire extent of the Island be represented on Exhibit 11 Site Plans.	The Applicant will review the feasibility of this recommendation.
84	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.11	Section 2.11 - Preliminary Design Drawings - Grading and Erosion Control Plans	Exhibit 11 - Preliminary Design Drawings	DPS advises that the PSS, while providing discussion of source of elevation data and derivation of 2-foot contours, and preliminary cut-and-fill calculations, it does not explicitly state that erosion control plans will be presented in the application, as required by 16 NYCRR §1001.11(c).	Sediment and erosion control measures will be presented in the Article 10 Application as required by 16 NYCRR §1001.11(c).

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85	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.11	Section 2.11 - Preliminary Design Drawings - Architectural Drawings	Exhibit 11 - Preliminary Design Drawings	The PSS does not specify that the Application will provide drawings including building and structure arrangements and exterior elevations for all buildings and structures, indicating the length, width, height, material of construction, color and finish of all buildings, structures, and fixed equipment. Include these drawings for the wind turbines, O&M building and any other structures associated with the Facility.	Publicly available information related to wind turbines (e.g., brochure material that provides dimensions, color, etc.) will be included with the Application for those turbines under consideration. With respect to other "structures" the associated details will not be definitively known at the time of Application; therefore, the Applicant will provide typical drawings or photographs.
86	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.11	Section 2.11 - Preliminary Design Drawings - Interconnection Facility Drawings	Exhibit 11 - Preliminary Design Drawings	DPS advises that information sufficient to demonstrate Cumulative Impacts of the Project including the Related Transmission Facilities must be provided for the Article 10 record, regardless of whether the Transmission Facilities are subject to PSL Article VII.	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction. The Application will address cumulative impacts of the Facility and related facilities including those of the Major Transmission Facility pursuant to PSL §168.2 and §168.4. With respect to cumulative impacts to be addressed in accordance with PSL Article 10, the Applicant looks forward to working with DPS staff to determine the exact parameters of the cumulative evaluation.
87	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.12	Section 2.12 - Construction	Exhibit 12 - Construction	DPS advises that there is nothing in the construction section outlining or detailing the processes for managing contingencies, special inspections required (i.e. cross-referenced with other sections of the document) and final commissioning of the facility. Applicant should develop an outline and details for the full scope of these topics.	The identification and management of contingencies will be outlined in the Emergency Action Plan (EAP) (per Section 2.18 of the PSS) and included in the application. In addition, procedures for commissioning the facility will be included in the application as discussed in Section 2.5 (f) 1- 3.
88	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.13	Section 2.13 - Real Property	Exhibit 13 - Real Property	Due to the limited extent of areas on Galloo Island that are outside of the Facility Site Parcels, DPS recommends that the entire extent of the Island be represented on Exhibit 13 Tax Map information.	Comment noted. The requested information will be included in the Article 10 Application.
89	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety	Exhibit 15 - Public Health and Safety	PSS statements regarding "ice shedding, tower collapse, blade failure, stray voltage, and fire in the turbines" (PSS page 57) do not give due consideration to on-site worker safety (including short- or long-term use of on-site residential accommodations), users of adjacent properties including private lands and NYS personnel at NYS or Federal lands, or traditional users of shoreline and near-shore areas including Gill Harbor as a safe-harbor, or North Pond as a traditional recreational use of the property. The scope of studies must be revised accordingly.	With respect to short-term (construction) and long-term (O&M) worker safety, the Applicant will develop a comprehensive EAP to be prepared in accordance with its O&M Safety Policies and OSHA regulations. This information will be included in the Article 10 Application. With respect to uses of adjacent properties on the island and adjacent shoreline and near-shore areas, this will be addressed in the context of appropriate setbacks from non-participating properties/areas, and the likelihood of public health and safety impacts in relation to appropriate setbacks.
90	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Shadow Flicker	Exhibit 15 - Public Health and Safety	The PSS states "[a]t distances beyond roughly 10 rotor diameters, shadow-flicker effects are generally considered negligible (BERR, 2009; DECC, 2011)." DPS advises that the discussion of shadow flicker in the PSS does not provide a sufficiently detailed basis to support the statement. The Applicant should specify whether sunlight reflections on water bodies could increase the distance of propagation of shadow flicker and whether current commercially available computer modeling tools are capable to predict flicker propagation under those circumstances.	Sunlight reflections off of water bodies does not increase the distance of propagation of shadow flicker. To explain why this is true it is necessary to first examine the general phenomenon of shadow flicker. Shadow flicker occurs when the relative distance between a light source (sun), occluding object (blade) and receptor are such that the occluding object occupies a sufficient portion of the receptor's angular field of view to mask all or a substantial portion of the light source. As the distance between the receptor and blade increases the portion of the receptor's angular field occupied by the blade decreases. To illustrate this concept, the reader can focus on a large object at some distance (tree or car) and gradually move their thumb toward their eye until their thumb entirely blocks out the much larger distant object. As stated in the PSS, shadow flicker effects are generally considered negligible when the linear distance between the turbine and receptor are greater than 10 rotor diameters. Introducing a reflective surface (water body) along the optical path between the turbine and receptor does not alter the inverse relationship between distance and effect. Shadow flicker would be observable in sunlight reflected off of a water body but it would diminish to a negligible effect at a total distance of 10 rotor diameters as measured from turbine to the point of reflection on the water body surface plus the distance from the point of reflection to the receptor. For practical purposes the additional optical path length introduced by the geometry of the reflected path compared to a direct line of site is de minimus and the same 10 rotor diameter threshold from tower would be applicable to reflected sunlight as well.
91	Andrea Corbin New York State Department	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Shadow Flicker	Exhibit 15 - Public Health and Safety	The PSS also states "[d]ue to the fact that the distance to the nearest potential residential receptor to the Facility Site is approximately 6 miles from the nearest permanent residence and 2.5 miles from nearest	Shadow flicker analyses are conducted on fixed points such as a residential homes and the results of the analysis are a quantification of potential shadow flicker hours, on a set of fixed points, over the course of a calendar year (e.g., Point A is modeled

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	of Public Service June 28, 2016					seasonal residence (Stony Island), well beyond the distance equal to 10 rotor diameters, shadow flicker effects are considered negligible and a shadow flicker analysis is not necessary." The discussion of shadow flicker in the PSS does not provide a sufficiently detailed basis to support the statement. The Applicant should consider all potential receptors sensitive to shadow flicker within the Island, as well. And although not necessarily public-health related, potential exposure of on-island National Register of Historic Places Historic Resources to shadow flicker should also be considered.	to receive 10 hours of shadow flicker per year). Given that Galloo Island is uninhabited, the Applicant requests clarification/identification of "all potential receptors sensitive to shadow flicker within the island". With respect to National Register of Historic Places (NRHP) resources, there are only two such listed resources on the island (the Lighthouse and attached Keeper's House, and the Fog Horn House). The Application will qualitatively discuss the potential effects of shadow flicker on the island's NRHP-listed resources.
92	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Shadow Flicker	Exhibit 15 - Public Health and Safety	The scope should specify that the Application will provide analysis to identify any limitations in future use of private or public lands on Galloo Island that may be imposed by shadow flicker from the Facility. DPS notes that section (a)(9) in 16 NYCRR §1001.24 Exhibit 24: Visual Impacts requires an "analysis and description of related operational effects of the facility such as visible plumes, shading, glare, and shadow flicker" and section 16 NYCRR §1001.24 (b)(8) requires analyses of the operational characteristics of the facility and related facilities, including shading, glare, shadow flicker, or related visible effects of facility operation, including an assessment of the predicted extent, frequency, and duration of any such visible effects created by the facility.	The application will include a shadow flicker study. However, it is worth noting shadow flicker, in general, does not preclude the use of land. In certain instances, shadow flicker may result in environmental impacts or have potential effects on surrounding land-uses. However, these potential effects do not unilaterally limit use of land.
93	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Mitigation Measures	Exhibit 15 - Public Health and Safety	DPS comments above regarding Exhibit 15 should be taken into consideration in revising proposed scope of studies including impact minimization and mitigation measures.	Comment noted. Please see response above.
94	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Audible Frequency Noise	Exhibit 15 - Public Health and Safety	PSS page 59 states "[t]he Facility is not expected to result in any public health and safety issues due to audible frequency noise." DPS advises that the discussion of Public Health issues related to audible frequency noise and low frequency sounds including infrasound in the PSS does not provide a sufficiently detailed basis to support that statement.	The statement on pg. 59 was based primarily on the distance to the nearest permanent receptors. Given these distances, and the generally limited on island public uses, significant adverse impacts associated with low frequency sound are not anticipated. Sound levels from wind turbines will drop off below existing background levels due to the very large distances to the nearest seasonal residences (2.5 miles), and permanent residences (6 miles). For example, at 2.5 miles, sound levels will decrease 80 dBA due to distance alone, and at 6 miles will decrease 88 dBA due to distance alone. In addition, as stated in the PSS Section 2.15 (e) 3, studies indicate the low-frequency content in the sound spectrum of typical modern wind turbines, similar to those proposed for the Galloo Facility, is no higher than that of the background levels in rural areas. While a previous sound assessment resulted in the DEC concluding that impacts were not likely to be significant, the Application will provide detailed support for these conclusions.
95	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Audible Frequency Noise	Exhibit 15 - Public Health and Safety	DPS Staff notes that 16 NYCRR §1001.15 - Exhibit 15 requires "[a] statement and evaluation that identifies, describes, and discusses all potential significant adverse impacts of the construction and operation of the facility, the interconnections, and related facilities on the environment, public health, and safety, at a level of detail that reflects the severity of the impacts and the reasonable likelihood of their occurrence, identifies the current applicable statutory and regulatory framework, and also addresses: ... (e) for wind power facilities, impacts due to blade throw, tower collapse, audible frequency noise, low-frequency noise, ice throw and shadow flicker." DPS also notes that 16 NYCRR §1001.19 -Exhibit 19(e) requires: "an analysis of whether the facility will produce significant levels of low frequency noise or infrasound." For these reasons the analysis of potential health impacts from audible noise, low frequency noise and infrasound should be included in the scope. Studies should also consider operational worker exposure at existing and proposed accommodations.	Comment noted. As stated in the response above and in the PSS Section 2.15(e) 3, studies indicate that low-frequency content in the sound spectrum of typical modern wind turbines, similar to those proposed for the Galloo Facility, is comparable to that of natural background sound levels in rural areas. The Article 10 Application will include additional discussion and literature review to support this conclusion in relation to sensitive receptors and infrasound and audible noise as well as potential effects at temporary on-island lodging for operational staff in accordance with OSHA standards.

Comment Number	Commenter/Date	Date of Comment	PSS Section	PSS Section and Title	Corresponding Application Exhibit Number and Title	Comment (Per Commenter)	Applicant Response
96	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Audible Frequency Noise	Exhibit 15 - Public Health and Safety	DPS advises that the PSS does not propose a methodology, reference or guideline for the evaluation of health effects from noise including low frequency noise and infrasound for the project. Please submit a preliminary list of methodologies, studies, references, standards and/or guidelines that are proposed to be used for evaluation of health effects along with a brief summary and justification for selection. DPS recommends as a minimum, comparing the noise levels from the project with the guidelines and recommendations from the World Health Organization: - World Health Organization. Night Noise Guidelines for Europe. 2009. - World Health Organization. Guidelines for Community Noise. 1999.	Project sound levels will be compared to the 1999 WHO Community Noise Guidelines and the 2009 WHO Night Noise Guidelines for Europe. Studies such as "Wind Turbines and Health: A Critical Review of the Scientific Literature" (McCunney et al; Journal of Occupational and Environmental Medicine; November 2014) will also be evaluated in the Article 10 Application.
97	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Low-Frequency Noise	Exhibit 15 - Public Health and Safety	The PSS states on page 58 that "[n]umerous studies show that the low frequency content in the sound spectrum of a typical modern wind turbine, like those proposed for this Facility, is no higher than that of the natural background sound level in rural areas (e.g., Sondergaard & Hoffmeyer, 2007; Hessler et al., 2008). There is no evidence that the audible or sub-audible sounds produced by operating wind turbines have any direct adverse physiological effects and the ground-borne vibrations from wind turbines are too weak to be detected by, or to affect, humans (Colby et al., 2009). Furthermore, due to the remote location, lack of public access, lack of permanent residences within 6 miles of the island, and lack of seasonal residences within 2.5 miles (Stony Island), it is not anticipated that there will be any potential for audible or low-frequency noise impacts related to operation of the Facility." DPS advises that the discussion of adverse impacts from audible, sub-audible and low frequency noise and ground-borne vibrations in the PSS does not provide a sufficiently detailed basis to support these statements. A thorough literature review of adverse impacts and health effects from noise including audible noise, low frequency noise and infrasound should be included in the Application as pre requirements of 16 NYCRR §1001.15 -Exhibit 15, Public Health and 16 NYCRR §1001.19 -Exhibit 19, Noise and Vibration. Studies should consider operational worker exposure at existing and proposed accommodations.	Comment noted. The Article 10 Application will include a comprehensive literature review of the potential for adverse impacts and health effects from noise including audible noise, low frequency noise and infrasound, including a review of potential effects at the proposed on island overnight accommodations for operational staff in accordance with OSHA standards.
98	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.15	Section 2.15 - Public Health and Safety - Low-Frequency Noise	Exhibit 15 - Public Health and Safety	DPS also advises that the scope should include analysis to identify any limitations in future use of private or public lands within Galloo Island that may be imposed by sounds or vibrations from the Facility.	Regarding the potential for identifying limitations of future public and private uses, the noise contour map to be prepared as stated in the PSS Section 2.19 (a) will identify predicted future sound levels on the island. However, use limitations are not anticipated since the potential effect are not expected to be significant. A detailed discussion of potential affects to future uses will be included in the Application.
99	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.18	Section 2.18 - Safety and Security - Security Lighting	Exhibit 18 - Safety and Security	DPS advises that security lighting should be designed to avoid off-site impacts including light trespass and dark-sky degradation. Lighting control plans generally should give consideration to the use of additional measures including: task lighting, that can be turned on when needed at areas that may require occasional night-time work such as O&M yards; full-cutoff fixtures without drop-down optics, that preclude horizontal or upward-directed light emissions that are not useful or necessary; and review of radar-activated FAA marking lights for night-time use, that are generally only lighted when aircraft approach and trigger activation of lighting for aviation safety.	Comment noted.
100	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.18	Section 2.18 - Safety and Security - Security Lighting	Exhibit 18 - Safety and Security	DPS advises that security lighting should specify use of full-cutoff fixtures with no drop-down optics to minimize light trespass and un-necessary lighting visibility.	Comment noted.
101	Andrea Corbin New York State Department	6/28/2016	2.18	Section 2.18 - Safety and Security - Aircraft Safety Lighting	Exhibit 18 - Safety and Security	DPS recommends that the applicant undertake consultation and the application include results of specific consultation with FAA regarding	Comment noted.

Comment Number	Commenter/Date	Date of Comment	PSS Section	PSS Section and Title	Corresponding Application Exhibit Number and Title	Comment (Per Commenter)	Applicant Response
	of Public Service June 28, 2016					consideration of use of RADAR-activated FAA aviation warning lights on proposed wind turbines.	
102	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration -	Exhibit 19 - Noise and Vibration	The PSS should briefly describe the specifications of the computer model that is proposed to be used for evaluation of operational noise impacts including range of frequencies that will be evaluated and whether the model calculations will be performed in full octave or one-third octave bands, the ground absorption values that are intended to be used, and the meteorological conditions that will be modeled. The applicant should also specify how the meteorological corrections will be assumed or calculated.	The ISO 9613-2 standard used to calculate future sound levels from the Project will be implemented by the Cadna/A computer software. The ISO standard performs calculations for the frequencies from 63 Hertz (Hz) to 8000 Hz. The standard accommodates full octave bands. However, one-third octave band data (if available) will be used in a spreadsheet to determine if a tonal condition is possible. A ground absorption factor, G, of 0.5 will be used, and no meteorological correction, Cmet, will be used. A temperature of 10 degrees C, and 70% relative humidity will be used to calculate atmospheric absorption in accordance with the standard. These conditions result in the smallest reduction in sound levels at the key frequencies for A-weighted sound levels.
103	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration -	Exhibit 19 - Noise and Vibration	The PSS should provide a brief discussion about the advantages or disadvantages of the use of the proposed models, methodologies and assumptions as compared to other alternatives. The Applicant should also provide a general discussion about the accuracy of proposed models and methodologies and the correlation between measurements and predictions for documented cases as compared to other alternatives especially as related to sound propagation on highly reflective water bodies.	To the extent that DPS staff has comments on the methodologies and assumptions of noise models, the Applicant will include a response to those in the Application. A discussion and literature review regarding accuracy of proposed noise modeling and more specifically sound propagation on water bodies will be included in the Article 10 Application.
104	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration -	Exhibit 19 - Noise and Vibration	The PSS should also explain how many combinations of scenarios (operational noise and meteorological conditions such as wind speed, wind magnitude and atmospheric stability) are proposed to be modeled for the project so that the operational noise levels as required by 16 NYCRR §1001.19 - Exhibit 19 and by local regulations can be properly calculated. DPS Staff notes that 16 NYCRR §1001.19 -Exhibit 19 requires worst case (L10) and typical (L50) operational noise levels either for a year, summer, winter, daytime or nighttime.	A full year of meteorological data will be used to calculate sound levels for each hour of the year (8760 hours). The Application will include a minimum of worst case (L10) and typical (L50) operation noises levels. Additional combinations of scenarios will be evaluated as part of the modelling analysis and included in the Application. In general, the sound levels will be driven by the hourly wind speed which drives the resultant sound power level of the wind turbine.
105	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration -	Exhibit 19 - Noise and Vibration	PSS states "[s]ound monitoring will be done in accordance with ANSI S12.18, as appropriate." DPS advises that scope should include consideration of other applicable recommendations of ANSI standards as appropriate, such as those contained in: - ANSI/ASA S3/SC1.100-2014/ANSI/ASA S12.100-2014 (Methods to Define and Measure the Residual Sound in Protected Natural and Quiet Residential Areas), - ANSI S1.13 2005.(R March 5, 2010) (Measurement of Sound Pressure Levels in Air) and, - ANSI S.12.9-1992 Part 2 (R2013) (Quantities and Procedures for Description of Environmental Sound. Part 2. Measurement of Long-Term, wide area sound) among other related standards.	Comment noted. In addition to ANSI S12.18, the Project will be evaluated in accordance with the relevant portions of ANSI S12.100, S12.9 Part 2, and the applicable acoustical terminology/definitions stated in ANSI S1.13 These methods and standards will be described in the Noise Impact Analysis (NIA) and summarized in Exhibit 19 of the Article 10 Application.
106	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Sensitive Sound Receptor Map	Exhibit 19 - Noise and Vibration	The PSS states:" The decommissioned lighthouse located on the southwestern tip of Galloo Island is considered a sensitive receptor due to its listing on the National Registry of Historic Places. The next closest sensitive receptors are seasonal residential facilities located on Stony Island, 2.5 miles or greater from the nearest Facility components. The nearest permanent residential receptor is over 6 miles away on the mainland. The noise contour maps developed in the NIA will show predicted future sound levels at the lighthouse on Galloo Island and the seasonal facilities on Stony Island as well as at the nearest mainland locations." Since the Applicant has already identified the decommissioned lighthouse at Galloo Island as the closest noise sensitive receptor, DPS-Staff recommends the applicant relocate the proposed monitoring location as indicated in Figure 4 closer to the Lighthouse premises, as feasible.	The current location is representative in terms of terrain, topography, vegetation, exposure to wind and proximity to the lakeshore which is a dominant contributor to ambient noise. The proposed monitoring location near the lighthouse was sited based on available access and proximity to the lighthouse (as a sensitive receptor) while maintaining appropriate distance from the shoreline to limit domination of ambient measurements by adjacent wave action. It should be noted that the proposed sound monitoring location has been intentionally situated very close to the lighthouse - approximately 1,000 feet from the structure.

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107	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Sensitive Sound Receptor Map	Exhibit 19 - Noise and Vibration	The Applicant should report the current use of existing buildings on the north-eastern portion of Galloo Island and whether ambient sound levels should also be measured close to those receptors.	Since the ambient sound environment at the island is dominated by wave action from Lake Ontario, and the wind itself, it will be fairly uniform all over the island. Therefore, ambient noise measured at the current monitoring location is representative of the barns and three seasonal use buildings at the north-eastern portion of the island.
108	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Sensitive Sound Receptor Map	Exhibit 19 - Noise and Vibration	Since The Applicant has already identified seasonal residential facilities on Stony Island as the second sensitive group of receptors, the Applicant should also consider collecting ambient sound information at that location.	Stony Island is a privately owned island and as such the Applicant does not have access. Ambient sound measured at the current Galloo Island monitoring location is representative of Stony Island for the same reasons listed in the above comment.
109	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Sensitive Sound Receptor Map	Exhibit 19 - Noise and Vibration	PSS states: "The Article 10 Application will provide a map of the three nearest mainland landfall locations where the NIA will estimate noise impacts." DPS-Staff comment: The map should also include all potentially impacted noise sensitive receptors and the noise impacts should be estimated at all identified locations as well.	Given the three nearest mainland receptors are not expected to experience impact from the Facility it is not clear what the extent of mapping is being requested. Per the PSS Section 2.19 (a) and (h), Exhibit 15 will include a noise contouring maps of future predicted sounds and a table outlining the noise standards applicable to the Facility and the degree of compliance at the three receptor locations.
110	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	PSS States: "Sound level data will be collected in compliance with the regulations using an industry standard, appropriately calibrated sound level meter and one-third octave band frequency spectrum analyzer." i. DPS-Staff recommends submitting a sound collection protocol for collection of pre-construction baseline noise levels within the project area to be discussed during the scoping and stipulation phases. DPS Staff also recommends to prepare this protocol based upon the most relevant and applicable portions of the most recent versions of ANSI/ASA standards for measurement of sounds. The sound protocol should include requirements for sound instrumentation (type, sound floor, wind screen, etc.), calibration requirements, meter settings, locations to be tested along with a justification as for why selected locations are considered to be representative potentially impacted noise receptors, noise descriptors to be collected, range of sound frequencies, weather conditions to be tested, testing conditions to be excluded, proposed seasonal schedules and time frames, testing methodologies and procedures, provisions for evaluation of existing tones or sounds with strong low frequency noise content if any, as well as provisions for analysis of results, reporting, and documentation. ii. DPS Staff also recommends that sound instrumentation to be used for ambient sound surveys comply with the following standards: - ANSI S1.43-1997 (R March 16, 2007). Specifications for Integrating-Averaging Sound Level Meters. - ANSI S1.11-2004 (R June 15, 2009) Specification for Octave-Band and Fractional-Octave-Band Analog and Digital Filters. - ANSI S1.40-2006 (R October 27, 2011) (Revision of ANSI 1.40-1984) Specifications and Verification Procedures for Sound Calibrators.	Sound levels will be measured in accordance with Section 2.19 (b) of the PSS. Specifically, the sound levels will be measured continuously (24 hours/day) using Larson Davis (LD) model 831 ANSI S1.4-1983 Type 1 Sound Level Analyzers (or equivalent). The LD 831 sound level meters will measure various broadband A-weighted (dBA) and one-third octave band sound levels including the L <sub>eq</sub> , L <sub>max</sub> , L <sub>10</sub> , and L <sub>90</sub> . The one-third octave band data will determine whether a prominent discrete (pure) tone currently exists in the baseline. The LD 831 also measures low frequency and infrasound levels down to 6.3 Hz. Data will be logged every 10 minutes with a one-second time history. The Analyzers will be calibrated before and after the measurement program using the appropriate manufacturer's sound calibrator.  Since this is a wind turbine project, the wind speed during the noise study is significant. The ground-level wind speed has a direct influence on the ambient sound levels. Ground-level wind speed and direction data will be continuously measured at two sound level monitoring locations for the duration of the noise study. A HOBO H21-002 micro-weather station with 2-meter tripod and data logger will be used. In addition, wind speed and wind direction data from an on-site meteorological tower will be provided in the Article 10 Application.  The sound level instrumentation used for the existing condition measurements has complied and will continue to comply with the relevant standards (ANSI S1.4; ANSI S1.43; ANSI S1.11).
111	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	iii. DPS-Staff recommends to include in the scope a collection of baseline infrasound levels at Galloo Island which may be later compared to estimates of infrasound levels from the Project at the closest sound sensitive receptors. DPS-Staff notes that 1001.19 Exh. 19 (e) requires an evaluation of whether the facility will produce significant levels of low frequency noise or infrasound. Please specify the lowest frequency that will be evaluated for infrasound. iv. DPS Staff recommends starting ambient sound collections after the specifics are discussed within the scoping and stipulation phases.	Based on the Applicant's experience, understanding of previous noise studies for the Hounsfield project, and knowledge of DPS Staff's recommendations from other proceedings, a scope of work consistent with Exhibit 19 has already been initiated. The work, as documented in the PSS and in these responses, is largely consistent with the comments from DPS Staff. Given the timing of review, the Applicant desires to complete the summer ambient work this year in order to allow the Application to be submitted by the end of the year.

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112	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	PSS states: "Ground-level wind speed data will also be measured at a minimum of one of the sound level monitors. In addition, detailed weather conditions from the nearest National Weather Service ("NWS") station in Watertown will be archived for the duration of the survey" DPS-Staff proposes using at a minimum a portable weather station at the closest noise sensitive location of the facility within Galloo Island to continuously document at minimum temperature, relative humidity, wind speed, wind direction, precipitation, and barometric pressure (optional) during the periods of sound collections. Weather conditions at other locations far from the Project site may be documented with information from the closest meteorological stations. Accuracy for the portable weather station or any hand held anemometers should be as recommended by ANSI Standards.	Ground-level wind speed and wind direction will be measured at two of the sound level measurement locations. All other meteorological parameters (temperature, precipitation, pressure, etc.) will come from the on-site meteorological towers and the nearby Watertown NWS station.
113	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	PSS states: "Data will be recorded continuously (24 hours/day) for at least one week during both the summer and winter at representative locations (see Figure 4)." DPS Staff comment: The applicant should report the temporal accuracy based upon the proposed seven-day sampling period at each location. DPS Staff notes that ANSI/ASA Standard S12.9-1992(R 2013)/Part 2 has several recommendations to either determine the number of days required to achieve a specific temporal accuracy (Survey Class) or to determine temporal accuracy based upon data collection results.	Comment noted. The continuous data recording (24 hours per day) for a seven-day period is compliant with ANSI/ASA Standard S12.9-1992. A detailed discussion of methodology and conformance to the applicable ANSI/ASA standards will be included in the Application.
114	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	PSS states: "The recorded data will be filtered to remove seasonal and intermittent noise." DPS-Staff comment: The Applicant should report whether the filtering will be performed by following the recommendations of ANSI/ASA S3/SC1.100-2014/ANSI/ASA S12.100-2014 (Methods to Define and Measure the Residual Sound in Protected Natural and Quiet Residential Areas)	Intermittent noise will be "filtered" by reporting the L90 metric which eliminates intermittent sound sources. Seasonal noise will be reported using the method in ANSI S12.100 to report the A-weighted, noise-compensated (ANS-weighted metric) which excludes sounds above the 1000 Hz octave band.
115	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	Please specify all receptor locations where construction noise impacts are proposed to be evaluated.	The Application will evaluate construction noise impacts at nearest potential seasonal residence (i.e. Stony Island) in order to assess representative noise impacts from construction activities. Additionally, construction related noise impacts will be assessed at the same places off of Galloo Island where ambient measurements were conducted. This assessment will be included in Exhibit 19 of the Application.
116	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Ambient Pre-construction Baseline Noise Conditions	Exhibit 19 - Noise and Vibration	PSS states: "The model will predict A-weighted sound levels at each of the three locations (see Figure 4), (...)" DPS-Staff notes that as required by 1001.19 Exhibit 19, section (h), the degree of compliance indicated by computer noise modeling should be estimated at a minimum, at representative external property boundary lines of the facility, related facilities and ancillary equipment sites, and at the representative nearest and average noise receptors. Please identify and include all boundary lines and noise receptors in the scope.	It is important to be clear on the distinction between measurements and computer modeling. Measurement data will be presented for each specific receptor (residence) at both property line(s) and at the receptor itself. However, tabular modeling results for all property lines are not practical or possible. Contour plots (isopleths) overlaid on property lines will provide the information required for Exhibit 19 for any property line of interest.
117	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Future Noise Levels at Receptors During Facility Operation	Exhibit 19 - Noise and Vibration	Please specify if acoustical information (such as sound power or sound pressure levels, tones, etc.) from the wind turbines are or will be determined by potential manufacturers by following IEC 61400-11 2012 Part 11, "Acoustic Noise Measurement Techniques," or any other applicable standard(s). The Applicant should also inform whether Sound Power Level information, as reported by using IEC TS-61400-14 Part 14 (Declaration of apparent sound power level and tonality values), is currently available for potential turbine options.	Sound power level data from the potential wind turbine manufacturer will be supplied in the Application. These data are collected using the IEC 61400-11 methodology.

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118	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Future Noise Levels at Receptors During Facility Operation	Exhibit 19 - Noise and Vibration	Please identify methodologies for determination of prominent tones from the wind turbines and substation tonal noise sources. Also specify the standards commonly used by potential manufacturers for determination of prominent tones for transformers and wind turbines. DPS Staff notes that there are different methodologies for definition and determination of prominent tones, including but not limited to the following: - Section 9.5 of IEC 61400-11 (Wind Turbines –Part 11- Acoustic noise measurements techniques) for the wind turbines. - Annex A from ANSI Standard S1.13-2005. - Annex C from ANSI Standard S12.9- 2005/Part 4.	Exhibit 19 will evaluate tonality from both wind turbines and substation transformers in accordance with ANSI S12.9 Part 3, Annex B (informative). This is identical to ANSI S12.9-2005/Part 4, Annex C.
119	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Future Noise Levels at Receptors During Facility Operation	Exhibit 19 - Noise and Vibration	PSS states: "Amplitude modulation will be addressed by determining whether the area has unusually high wind shear or turbulence that could contribute to the phenomenon. "DPS-Staff comment: The PSS should also specify any standards that are proposed for evaluation of wind shear and turbulence, such as IEC 61400- 11 Annexes B and D as applicable and appropriate.	Reporting of wind shear and turbulence data will come from the on-site met tower data. Additional standards and guidance documents, (i.e., the IEC 61400-11) will be utilized as applicable and appropriated. A detailed discussion of the met tower data, and other applicable standards for evaluation will be included in the Application.
120	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Future Noise Levels at Receptors During Facility Operation	Exhibit 19 - Noise and Vibration	PSS states: "The potential of the Facility to produce infrasound and low-frequency sound will also be evaluated, in the context of sound attenuating approximately 6 miles to the nearest sensitive receptors" (e.g. Spherical, cylindrical). DPS Staff comment: Sound sensitive locations closer than the 6-mile proposed distance should also be evaluated for Infrasound and Low frequency sounds. The Applicant should also report the divergence pattern that will be assumed for propagation of infrasound at long distances.	Comment noted. Infrasound levels will be calculated at the nearest sensitive locations off Galloo Island. The divergence rate of propagation used in the calculations will be cited in the Application.
121	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Future Noise Levels at Receptors During Facility Operation	Exhibit 19 - Noise and Vibration	PSS states: "a discussion of infrasound impacts will be based on other recent wind projects where actual post-construction sound data is publicly available, and/or the literature." DPS Staff comment: The Applicant should clarify whether the evaluation of infrasound impacts will be based upon sound data information that was collected from wind turbine projects with the same potential turbine models operating at similar conditions. DPS Staff also requests that the Applicant includes a list of the sound data and the literature references mentioned in this section.	The evaluation of infrasound will be based on available literature of selected model(s). It is worth noting that infrasound data (below 20 Hz) is not required as part of the wind turbine supplier acoustic standard (IEC 61400-11). Therefore, the Application will include list of available sound data, detailed discussion and appropriate literature references for a similarly scaled project. Should a model be selected that has available infrasound data, then this information will be used as the basis for infrasound evaluation.
122	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please specify whether ambient and operational sound data for periods when the turbines will not be operational will be excluded from the calculations, when reporting the levels required by 16 NYCRR §1001.19 - Exhibit 19(f). DPS Staff recommends reporting both results, including and excluding the periods when the turbines will not be operational at least for the closest potentially impacted noise sensitive receptor locations.	In the Application, periods when the turbines will not be operational will be included in the calculations of the yearly average for operational sound levels.
123	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	PSS states: "The Article 10 Application will provide the A-weighted/dBA sound levels, in tabular form, for the operating Facility. Predicted sound levels will be shown through graphical isolines of A-weighted decibels. " DPS advises that the scope should identify the minimum and maximum noise contour level (dBA) that will be rendered along with the incremental steps in between. DPS-Staff recommends rendering noise contours at a minimum in 5-dBA steps and detailed renders in 1-dBA steps at project boundaries adjacent to any identified noise sensitive receptors in Galloo Island.	Comment noted. The noise contouring map isolines of the A-weighted decibels will included the minimum and maximum noise contour level (dBA). Contours will be at a minimum 5-dBA increments.
124	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please specify the time range proposed for determination and reporting of the L90 statistical descriptor (e.g. 1-hour, 15-hour (daytime), 9-hour (nighttime), 7-day, 14-days, etc.).	Daytime will be 15 hours (7 AM – 10 PM), and nighttime will be 9 hours (10 PM – 7 AM).

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125	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please clarify that the L10 statistical noise descriptor corresponds to estimates for one year of operation.	The L10 statistical noise descriptor corresponds to estimates for one year of operation.
126	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please clarify whether the L10 statistical noise descriptor is proposed to be estimated for the summer nighttime period for one year of operation.	The L10 statistical noise descriptor is proposed to be estimated for the summer nighttime period for one year of operation.
127	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please clarify whether the L10 statistical noise descriptor is proposed to be estimated for the winter nighttime period for one year of operation.	The L10 statistical noise descriptor is proposed to be estimated for the winter nighttime period for one year of operation.
128	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please clarify that this calculation will include both summer and winter data.	These calculations will include both summer and winter data.
129	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Predicted Sound Levels Table	Exhibit 19 - Noise and Vibration	Please clarify that the L50 statistical noise descriptor corresponds to the daytime in a year.	The L50 statistical noise descriptor will correspond to the daytime in a year.
130	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Applicable Noise Standards	Exhibit 19 - Noise and Vibration	The PSS should include design goals for the Facility for issues that may be better addressed in terms of absolute noise guidelines (e.g. sleep disruptions, outdoor and indoor speech interference, hearing loss, annoyance, complaint potential and health issues). The Applicant should explain whether the analysis of annoyance and complaints may also require an additional evaluation in terms of relative noise guidelines and include the references for such methodologies/guidelines. Please see additional DPS-Staff comments in subsection 2.19. (k) below.	The proposed Facility is situated 6 miles from the nearest permanent resident. Sound levels are anticipated to dissipate substantially over this distance. Therefore, community noise impacts are not anticipated to be significant. However, community complaint potential will be addressed using WHO Guidelines for Community Noise serious and moderate annoyance criteria and ANSI S12.9 Part 5 and included in the Article 10 Application.
131	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Noise Standards Comparison Table	Exhibit 19 - Noise and Vibration	PSS states: "A table outlining noise standards applicable to the Facility, including any local regulations and noise design goals will be provided with the Article 10 Application, including the degree of compliance at three nearest mainland landfall locations, indicated by the above-referenced noise modeling." Please see DPS-Staff comments on subsection 2.19(a)	The Applicant will review local codes as described in section 2.31 of the PSS and DEC guidance and will provide a summary of applicable noise standards in the Article 10 Application. In addition, the Applicant will include a summary of noise-modelling results from the Noise Impact Analysis for each monitoring location in relation to applicable noise ordinances.
132	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Noise Abatement Measures for Facility Design and Operation	Exhibit 19 - Noise and Vibration	The new studies should analyze all potential impacts (e.g.: noise, vibration, public health) and whether abatement measures are necessary.	Comment noted. These will be provided as stated in Sections 2.15 and 2.19 of the PSS.
133	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Noise Abatement Measures for Facility Design and Operation	Exhibit 19 - Noise and Vibration	DPS Staff also notes that 16 NYCRR §1001.19 -Exhibit 19(j) requires "An identification and evaluation of reasonable noise abatement measures for the final design and operation of the facility including the use of alternative technologies, alternative designs, and alternative facility arrangements".	As stated previously and in the PSS, adverse noise related impacts are not anticipated due the general remote location of this Facility and since the previous findings of the Hounsfield project indicated there would be no adverse impacts. However, efforts will be made, as stated in Section 2.15 and 2.19 of the PSS to study, evaluate and assessment potential noise-related impacts of the proposed Facility. Part of this assessment will include an assessment of reasonable noise abatement measures during construction (i.e., implementing BMPs, complaint resolution plan, etc.) as well as a discussion of reasonable noise abatement to be implemented as part of Facility design and operations, should significant adverse noise impacts be identified.

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134	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	PSS states: "The potential for the Facility to result in hearing damage will be addressed using OSHA standards" Please add the recommendations of the United States Environmental Protection Agency and the guidelines of the World Health Organization as criteria for evaluation of potential for hearing loss. While OSHA standards may be suitable to analyze potential for hearing loss for Facility workers during work shifts, the potential for hearing loss at sensitive receptors should be better analyzed under the USEPA and WHO guidelines which are not to exceed a level of 70 dBA Leq 24-h for long-term exposure to continuous noise sources.	The recommendations of the US EPA and WHO for hearing loss/impairment will be used to evaluate impacts from the Project.
135	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	PSS states: "Indoor and outdoor speech interference will be addressed using the EPA Guideline Level, which is protective of activity interference." DPS-Staff notes that Indoor and outdoor speech interference should also be evaluated by using the World Health Organization guidelines.	The recommendations of the US EPA and WHO for indoor and outdoor speech interference will be used to evaluate impacts from the Project
136	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	PSS states: "Community complaint potential will be addressed using WHO Guidelines for Community Noise serious and moderate annoyance criteria, ANSI S12.9 Part 5, (...)" DPS-Staff comment: WHO guidelines criteria for serious and moderate annoyance and ANSI S12.9 Part 5 seem to be based on the analysis of annoyance from transportation noise sources (traffic, aircraft and railroad noise) and not on Wind Turbine Noise cases. WHO guidelines also recommends considering lower values than those listed in its guidelines for noise sources with low frequency noise content. Therefore, DPS-Staff considers that the potential for annoyance and complaints should be analyzed with studies that are specifically related to annoyance and complaint potential from wind turbine noise.	Potential for annoyance and complaints will be evaluated looking at reports such as "Response to noise from modern wind farms in The Netherlands", a peer-reviewed paper published in the Journal of the Acoustical Society of America (Pedersen et al; August 2009).
137	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	The applicant should specify the community noise impacts that are proposed to be analyzed under the NYSDEC noise policy (e.g., community complaint potential) and how the policy is planned to be applied to the project including the noise descriptors that will be used to describe ambient and operational sounds, a summary of the procedures that will be followed for determination of change in noise levels along with a discussion about whether the interpretation, the noise descriptors and the procedures that are proposed are also consistent with applicable methodologies to evaluate the noise impacts under consideration. DPS Staff notes that the NYSDEC noise policy advises the following: "thresholds as indicators of impact potential should be viewed as guidelines subject to adjustment as appropriate for the specific circumstances one encounters."	A summary of thresholds and guidelines included in the NYSDEC Program Policy Assessing and Mitigating Noise Impacts, as well a description of compliance with these guidelines, will be provided in the noise report to be included with the Article 10 Application.
138	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	The NYSDEC policy also lists several examples of methodologies that may be used for noise analyses prepared for projects such as the Composite Noise rating (CNR), Community Noise Equivalent Level (CNEL) and Day-Night Noise Levels (Ldn).	Comment noted. A summary of guidelines will be provided in the noise report to be included with the Article 10 Application.
139	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	The applicant should explain whether proposed methodologies and criteria were developed based upon data related to annoyance or complaints from wind turbine projects. DPS Staff recommends evaluation of annoyance and community complaint potential based on a thorough review of literature specifically as related to wind turbine noise.	Since the project is located 6 miles from the nearest residential receptor, significant adverse community noise impacts and complaints are not anticipated. However, per Section 2.19 (k) of the PSS and these responses, the Application will include a literature review and discussion of the Facility and compliance with US EPA WHO Guidelines for Community Noise annoyance criteria.

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140	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Community Noise Impacts	Exhibit 19 - Noise and Vibration	<p>PSS states:” The Applicant is not aware of a wind project that resulted in structural damage due to noise or vibrations, and this Facility is not anticipated to result in any structural damage. The Applicant is not aware of any technical, industrial, or medical activities that take place on Galloo Island that are sensitive to vibration or infrasound. Therefore, impacts to such activities and instruments are not anticipated, and will not be discussed in the Article 10 Application.”</p> <p>DPS-Staff advises that this section should contain four subjects that may need to be evaluated separately:</p> <ul style="list-style-type: none"> <li>i. Potential for some construction activities (such as blasting, pile driving, excavation, horizontal directional drilling (HDD) or rock hammering, if any) to produce any cracks, settlements or structural damage on any existing proximal buildings, including any residences and historical buildings.</li> <li>ii. Potential for ground-borne transmitted vibrations from the operation of the Facility to reach a noise sensitive receptor and cause vibrations on the floor or on building envelope elements that may be perceived by the receptor. The Applicant may want to consider the criteria and procedures discussed in the following national and international standards: <ul style="list-style-type: none"> <li>- ANSI S2.71-1983 (Guide to the Evaluation of Human Exposure to Vibration in Buildings (R 2012))</li> <li>- ISO 2631-2-2003 (Evaluation of Human Exposure to Whole-body Vibration Part 2: Vibration in buildings (1 Hz to 80 Hz)).</li> <li>- Additional information may also be found in ASHRAE Handbook-HVAC Applications 2011, chapter 48, Noise and vibration control, Vibration Criteria p.p. 48.43-48.44.</li> </ul> </li> <li>iii. Potential for air-borne induced vibrations from the operation of the facility to generate annoyance, cause rumbles or vibration and rattles in windows, walls or floors of sensitive receptor buildings. <ul style="list-style-type: none"> <li>- The applicant may want check the Hubbard’s Methodology to evaluate this issue or,</li> <li>- The outdoor criteria established in annex D of ANSI standard S12.9 - 2005/Part 4.</li> <li>- Applicable portions of ANSI 12.2 (2008) may be used for the evaluation of frequency bands where ANSI 12.2 (2008) may be a more restricting criteria or if it is expected ANSI S12.9-2005/Part 4- Annex D guidelines being met but still represent a potential for perceptible vibrations at indoor locations of sensitive sound receptors, if any.</li> </ul> </li> <li>iv. Potential of low-frequency noise including infrasound and vibration from operation of the facility to cause any interference with the closest seismological and infrasound monitoring systems.</li> </ul> <p>For this subject DPS Staff recommends that the Application include a map in proper size and scale to show the location of the closest seismological and infrasound stations on both sides of the border between US and Canada in relation to the Project site, and a table with approximate GPS coordinates and distances from identified stations to the Project site. For a discussion about potential issues the Applicant may want to consult, among others, the following references:</p> <ul style="list-style-type: none"> <li>- Technological Information and Guidelines on the Assessment of the Potential Impact of Wind Turbines on Radio Communication, Radar and Seism Acoustic Systems. Radio Advisory Board of Canada (RABC). Canadian Wind Energy Association (CanWEA). April 2007.</li> <li>- Micro Seismic and Infrasound Monitoring of Low Frequency Noise and Vibrations from Wind farms. Recommendations on the siting of Wind</li> </ul>	<ul style="list-style-type: none"> <li>i. Information regarding construction activities and blasting will be included in the Preliminary Blasting Plan and the Preliminary Geotechnical Report and will be summarized in Exhibits 12, 19 and 21 of the Application.</li> <li>ii. The Application will include a detailed reasoning based on a literature review describing why vibration from operating wind turbines is not an issue and why a pre-construction vibration survey will not be conducted. The literature review will include studies such as the “Wind Turbine Health Impact Study: Report of Independent Expert Panel, January 2012, Prepared for: Massachusetts Department of Environmental Protection, Massachusetts Department of Public Health”.</li> <li>iii. The Application will include a reasoning, based on a literature review, describing why air-borne vibration from operating wind turbines is not an issue and why a pre-construction vibration survey will not be conducted. The literature review will include studies such as the “Wind Turbine Health Impact Study: Report of Independent Expert Panel, January 2012, Prepared for: Massachusetts Department of Environmental Protection, Massachusetts Department of Public Health”.</li> <li>iv. A map and discussion of the seismological and infrasound stations within 100 miles of the Facility site will be created based on available information and included in the Application. If the distances from the project site are more than 100 miles, a discussion may be substituted for a map.</li> </ul>

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						<p>Farms in the vicinity of Eskdalemuir, Scotland. Styles, Stimpson, Toon, England, Wright. Applied and Environmental Research Group. Earth Sciences and Geography. School of Physical and Geographical Sciences. Keele University. 18 July 2005.</p> <p>For information about Seismic Stations in the U.S. that are part of the USGS monitoring system, the Applicant may want to consult the USGS website.</p> <p>For information about seismic stations in Canada, the Applicant may want to consult the NRCAN website.</p> <p>For information about the existing and planned infrasound and seismic stations that are part of the International Monitoring System (IMS) the Applicant may want to visit the CTBTO (Comprehensive Nuclear Test Ban Treaty Organization) website <a href="http://www.ctbto.org">www.ctbto.org</a>.</p>	
141	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Post-construction Noise Evaluation Studies	Exhibit 19 - Noise and Vibration	Consistent with 16 NYCRR §1001.19 -Exhibit 19 (m) please add a description of post-construction noise evaluation studies that shall be performed to establish conformance with operational noise design goals.	Comment noted. Exhibit 19 of the Application will provide a description of the proposed post-construction noise studies.
142	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.19	Section 2.19 - Noise and Vibration - Operational Controls and Mitigation Measures to Address Reasonable Complaints	Exhibit 19 - Noise and Vibration	<p>PSS States: "The NIA will include a discussion of any potential post-construction mitigation measures and procedures for implementing operational controls to address reasonable complaints or any noise-related issues that are identified during post-construction evaluation." DPS Comment: For illustrative purposes, please list general examples of post-construction mitigation measures that may be applied to address reasonable complaints.</p>	Efforts will be made, as stated in Section 2.15 and 2.19 of the PSS to study, evaluate and assessment potential noise-related impacts of the proposed Facility. Part of this will include an assessment of reasonable noise abatement measures during construction (i.e., implementing BMPs, complaint resolution plan, etc.) as well as potential abatement measures for Facility design and operations. A list of potential abatement measures will be included in the Application.
143	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.20	Section 2.2 - Cultural Resources - Current Recommendations for Additional Work	Exhibit 20 - Cultural Resources	DPS advises that it is not clear that the Related Transmission Facilities (RTF) location on Galloo Island was previously considered in archeological survey evaluations performed for the Hounsfield Wind Project. The PSS discussion does not clearly indicate whether the substation and landfall location of the RTF correspond with prior survey areas. DPS advises that this should be discussed in developing the final scope of studies.	<p>EDR submitted a Cultural Resources Summary and Work Plan to NYSOPRHP via the Cultural Resource Information System (CRIS) website on June 3rd, 2016. The Work Plan included a summary of the previous Phase 1B archaeological survey that had been conducted for the Hounsfield Wind Farm. The previous Phase 1B archaeological survey for the Hounsfield Wind Farm was conducted in accordance with NYSORHP's SHPO Wind Guidelines (NYSOPRHP, 2006), which define a methodology for the intensive sampling of environmental zones within a project's Area of Potential Effect (or APE, i.e., the extents of proposed ground disturbance) rather than surveying the entire APE at a less intensive interval as would be done for other (non-wind) types of projects. In addition, the Work Plan (and PSS) noted that the APE for the Galloo Island Wind Facility is significantly reduced relative to the limits of ground disturbance for the Hounsfield Wind Project that were evaluated in the previous Phase 1B archaeological survey.</p> <p>As noted in the PSS, NYSOPRHP concurred with the methods and findings of the Phase 1B archaeological survey for the Hounsfield Wind Project (which included a proposed substation on Galloo Island) and recommended no further work with the stipulation that the four archaeological sites identified during the Phase 1B survey were avoided by the proposed project. If the sites could not be avoided, NYSOPRHP recommended that Phase II investigations be conducted.</p> <p>Although the upland RTF locations on Galloo Island were not specifically discussed relative to the previous Phase 1B archaeological survey conducted for the Hounsfield Wind Project, the previous survey exceeds requirements to assess the potential for archaeological materials to be present within the currently proposed Facility site (including upland RTF located on Galloo Island) per the SHPO Wind Guidelines (NYSOPRHP, 2006). The Cultural Resources Summary and Work Plan for the Galloo Island Wind Facility included the recommendation that due to the extent of the archaeological survey for the Hounsfield Wind Farm, and the reduced size of the APE for the Galloo Island Wind Facility relative to the Hounsfield Wind Farm, no additional archaeological survey of the components of the Facility located on Galloo</p>

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							Island should be required. NYSOPRHP provided a response on July 1, 2016 indicating their concurrence with the Work Plan as proposed by EDR, and that no additional archaeological survey would be required (with the understanding that the project layout avoids impacts to the four archaeological sites identified during the previous survey). A copy of the July 1, 2016 letter from NYSOPRHP is included as Attachment B.
144	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.20	Section 2.2 - Cultural Resources - Current Recommendations for Additional Work	Exhibit 20 - Cultural Resources	The location of the RTF underwater in Lake Ontario involves locations that were not addressed in previous reviews of the Hounsfield Wind Project. Cumulative impact assessments of all related facilities is required per the Siting Board findings necessary to comply with PSL §168.2 and §168.4. Scoping document should be revised to address how and when the evaluation of underwater and upland resources associated with the RTF will be undertaken and reported	The Application will consistently describe and define Article 10 jurisdiction and Article VII jurisdiction. The Application will address cumulative impacts of the Facility and related facilities including those of the Major Transmission Facility pursuant to PSL §168.2 and §168.4. With respect to cumulative impacts to be addressed in accordance with PSL Article 10, the Applicant looks forward to working with DPS staff to determine the exact parameters of the cumulative evaluation. Detailed plans for the transmission facilities (transmission line, substations, and ancillary facilities) are still being developed. The following addresses the above comment based on the current understanding of the proposed transmission facilities (RTF). An underwater archaeological investigation will include a magnetometer survey and a side scan sonar survey to identify potential archeological resources and any such areas will be evaluated in determining final cable route alignment. The Applicant will consult with NYSOPRHP to confirm the scope and methods for the survey prior to initiating fieldwork. As previously discussed, the RTF on Galloo Island (Collection Substation and Landfall Location for the Transmission Line) are considered to have been adequately surveyed during PCI's Phase 1B archaeological survey for the Hounsfield Wind Project. Although the footprints of the RTF on Galloo Island may not have been directly surveyed during PCI's Hounsfield Wind Phase 1B archaeological, the extent of Phase 1B survey coverage exceeded requirements to address the potential for archaeological resources to be present within and near the currently proposed Facility (including RTF) on Galloo Island (see response to previous comment above for further explanation of this point). For the onshore RTF located in Oswego, NY (the Point-of-Interconnect [POI] Substation) the Applicant will consult with NYSOPRHP regarding the possible need for archaeological survey of the APE associated with the substation and any ancillary facilities.
145	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.20	Section 2.2 - Cultural Resources - Current Recommendations for Additional Work	Exhibit 20 - Cultural Resources	DPS advises that additional documentation should be provided regarding the potential for additional areas of Facility visibility in the Project Study Area landscape, due to increased height of wind turbines proposed in the current project versus previous study of the Hounsfield Wind Project. Since proposed turbine locations, maximum turbine height, and study area distance are already known, preliminary viewshed maps can be readily prepared, and areas of predicted Facility visibility determined for the present project compared with the previous studies of the Hounsfield Wind Project. The need for additional historic resource evaluations for any additional areas of visibility can then be determined. This would also allow consideration of historic resources that may have been identified since the previous studies were done in 2009.	EDR submitted a Cultural Resources Summary and Work Plan to NYSOPRHP via the Cultural Resource Information System (CRIS) website on June 3rd, 2016. As a significant historic architectural resources survey had been undertaken for the Hounsfield Wind Farm within the study area for Galloo Island Wind, the Work Plan did not recommend any additional historic architectural resources surveys. NYSOPRHP provided a response on July 1st, 2016 indicating their concurrence with the Work Plan as proposed by EDR, and no additional architectural surveys would be required. A copy of the July 1, 2016 letter from NYSOPRHP is included as Attachment B.  As noted in the Work Plan, a previous historic-architectural resources survey was conducted for the areas within the topographic viewshed within 10 miles of the proposed Hounsfield Wind Project (as well as an additional area that extended to 13 miles in the Village of Sackets Harbor). A comparison of the areas of predicted visibility based solely on topography (i.e., the topographic viewshed analysis) for the Hounsfield Project and the Galloo Island Wind Facility (based on the current proposed Facility layout and maximum height of the proposed turbines under consideration) is included as Attachment C. As shown in the viewshed comparison, the areas of predicted visibility are generally the same for the current project as they were for the previously proposed project. Many of the areas of predicted visibility for

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							<p>the Galloo Island Wind Facility that were not also areas of predicted visibility for the proposed Hounsfield Project are located in open water, where no historic-architectural resources are located. The areas of predicted visibility for the Galloo Island Wind Facility that were not also areas of predicted visibility for the proposed Hounsfield Project located on the mainland are limited to 4,324 acres or approximately 5% of the mainland portions of the 15-mile study area. As shown in Attachment C, these areas of "new" visibility are generally small slivers of land (as opposed to large contiguous areas). In addition, the previous historic-resources survey report identified historic resources in areas where no turbines were predicted to be visible, which indicates a more thorough review of the study area that was not strictly limited to areas of predicted visibility for the Hounsfield Project.</p> <p>Based on NYSOPRHP's review and concurrence with the Cultural Resources Summary and Work Plan, and the comparison of the predicted visibility of the Galloo Island Wind Facility with the viewshed analysis for the Hounsfield Project, it is not anticipated that additional historic-architectural resources survey will be necessary. Per the Work Plan recently approved by NYSOPRHOP, a complete Historic Resources Visual Effects Analysis for the Project will be included in the Article 10 Application.</p>
146	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.21	Section 2.21 - Geology, Seismology, and Soils - Fill, Gravel, Asphalt, and Surface Treatment Material	Exhibit 21 - Geology, Seismology, and Soils	PSS Section 2.21, page 85, calculation of the amounts of fill, gravel, asphalt, and surface treatment materials should be based on the proposed layout of turbines, access roads, collection lines, staging areas and all other project facilities and construction areas, and not just based on "typical details."	Calculation of the amounts of fill, gravel, asphalt, and surface treatment materials will be based on the anticipated amount of material needed. For example, an access road typical detail will indicate typical width of road and depth of gravel, which will be multiplied by the linear distance of proposed access road.
147	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.21	Section 2.21 - Geology, Seismology, and Soils - Fill, Gravel, Asphalt, and Surface Treatment Material - Excavation Techniques to be employed	Exhibit 21 - Geology, Seismology, and Soils	PSS Section 2.21, pages 85-87, Applicant should provide a detailed plan describing the scope of geotechnical investigations that will be performed prior to the Application. The Geotechnical Investigation Plan should provide a full description of the proposed geotechnical investigations proposed for evaluating the subsurface conditions in the project area and include test borings in representative locations of turbine foundations, road construction, underground collection line installation, and areas where horizontal directional drilling (HDD) is considered for installation of collection lines. Any available information regarding geotechnical investigations and feasibility of the associated interconnection facilities should also be provided. Reasonable preliminary calculations of the amounts of necessary cut and fill materials, designation of cut and fill storage areas, excavation techniques require detailed geotechnical investigations prior to the Application to assess the suitability of excavated materials for re-use as fill.	<p>The Applicant will prepare a Preliminary Geotechnical Report which will include the following (pg. 86 of PSS)</p> <ul style="list-style-type: none"> <li>• Literature review based on publicly available data regarding surface and subsurface soil, bedrock, and groundwater conditions</li> <li>• Test borings, to be completed if literature review is determined to be insufficient, at a sub-set of turbine locations and the substation locations</li> <li>• Data analysis</li> <li>• A report that generally describes the following: <ul style="list-style-type: none"> <li>o Surface Soils</li> <li>o Subsurface Soils</li> <li>o Bedrock Conditions</li> <li>o Hydrogeologic Conditions</li> <li>o Chemical and Engineering Properties</li> <li>o Laboratory Testing</li> <li>o Seismic Considerations</li> <li>o Construction Suitability Analysis and Recommendations</li> </ul> </li> </ul> <p>This information will be summarized in Exhibit 21 and the supporting studies will be appended to the Application.</p>
148	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.21	Section 2.21 - Geology, Seismology, and Soils - Soil Types Map	Exhibit 21 - Geology, Seismology, and Soils	PSS Section 2.21, pages 89-90, describes the surficial soils in the project area as primarily glacial till underlain by limestone. Soils containing large quantities of limestone may be corrosive to steel, particularly if soils are located in an area of a shallow water table. The existing soils in the project area are expected to have a high potential for the corrosion of steel. The Application should evaluate the suitability of existing soils types for reuse as backfill, particularly in areas where reinforcement steel will be used in foundation design. Additionally, provide a description of additional protection of reinforcement in accordance with American Concrete Institute ACI 318, section 7.7.5. This evaluation should be considered in the preliminary calculations of fill materials that will be required for the project.	Preliminary geotechnical analysis will evaluate suitability of resident soil and excavation materials for backfill. Foundation design will be in compliance with all applicable design standards and recommendations including ACI.

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149	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.21	Section 2.21 - Geology, Seismology, and Soils - Foundation Evaluation	Exhibit 21 - Geology, Seismology, and Soils	PSS Section 2.21, page 91, states that "[f]oundation construction occurs in several stages, which typically includes excavation, pouring of concrete mud mat, rebar and cage assembly, outer form setting, casting and finishing of concrete, removal of forms, backfilling and compacting, and site restoration." Provide a description of the testing procedures and any special inspections to be performed during rebar and cage assembly and concrete installations.	The Application will include a list of quality control and inspection procedures.
150	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.22	Section 2.22 - Terrestrial Ecology and Wetlands -	Exhibit 22 - Terrestrial Ecology and Wetlands	DPS advises that the Project Site is nearby to Little Galloo Island, a designated Significant Coastal Fish and Wildlife Habitat area, and should be identified as within the appropriate Study Area. Assessment of wildlife usage of the shoreline and mainland areas of Galloo Island and its airspace are important considerations. NYS DEC has had management success and reestablishment of rare species since the prior Hounsfield Wind Project was reviewed. Assessment of Little Galloo Island use as a wildlife management area must be addressed in detail in the proposed Scope of Studies and results of studies reported in the Application.	The Applicant has consulted with NYSDEC on recommended scope of wildlife study, including DPS participation. See correspondence included in Appendix F of the PSS. The Applicant will conduct additional consultation with NYSDEC and DPS in light of this comment.
151	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.23	Section 2.23 - Water Resources and Aquatic Ecology - Hydrologic Information	Exhibit 23 - Water Resources and Aquatic Ecology	Although the publicly available data may be limited, groundwater data, including groundwater depth, quality and flow direction, should be obtained during the advancement of geotechnical test borings within the project area. The results of groundwater investigations should be included in the application. Because of the generally anticipated shallow depth of the groundwater table in the project area, it is expected that dewatering will be required. The Application should include a detailed description of the proposed dewatering practices and a demonstration of how the proposed dewatering will avoid and/or minimize flooding, surface water runoff, and transport of fine-grained soils into existing surface water bodies. Any locations where permanent dewatering will be required should be identified and permanent dewatering practices should be described in detail.	A proposed method of dewatering will be described in the Application. This method will address concerns and requirements related to runoff and sediment transport as well as any other applicable SPDES General Permit 0-15-002 requirements. Additionally, a project Stormwater Pollution Prevention Plan (SWPPP) addressing construction related best management practices (BMPs) will be prepared and appended to the application. However, permanent dewatering will not be required.
152	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.23	Section 2.23 - Water Resources and Aquatic Ecology - Drinking Water Supply Intakes	Exhibit 23 - Water Resources and Aquatic Ecology	Although the applicant notes that there are no known drinking water wells or water supply intakes within or near the project area, there is a private rental lodge on Galloo Island. Applicants should identify the water source for the rental lodge and address mitigation measures that will be implemented to avoid impacts to lodge's source water and facilities.	Applicant will confirm lodge water source and avoid impact.
153	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.23	Section 2.23 - Water Resources and Aquatic Ecology - Impacts to Surface Waters	Exhibit 23 - Water Resources and Aquatic Ecology	The surface waters within the project area drain into Lake Ontario, a Class A water body suitable for domestic potable water supply, public bathing and general recreation use, and support of aquatic life. The Application should include a detailed description of erosion control measures that will be implemented to avoid transport of fine-grained soils and turbidity impacts to the lake during construction. Prevention of transport of stockpiled fine-grained soils should be addressed. (a) DPS advises that PSL §168.2 requires the Siting Board to make explicit findings regarding the nature of the probable environmental impacts, including cumulative environmental impacts of related facilities, of the construction and operation of the proposed facility. Although the Applicant intends to address the underwater transmission cable in an Article VII Application, the feasibility of the proposed wind energy facility is dependent upon the interconnection cable, and therefore details of the underwater transmission facility should be provided. The Applicant shall provide in its application a cumulative project impact analysis characterizing the nature and extent of impacts associated with the construction and operation of the Related Transmission Facilities, including the 30-mile 145 kV underwater transmission facility. A description of the feasibility (including a general statement noting construction and operation of the underwater cable is	The Article 10 Application will include a detailed description of proposed sediment and erosion control measures, and the Preliminary Design Drawings prepared in support of Exhibit 11 will include typical details of such measures considering the location of this Facility and associated resources of concern.  The Applicant will include the Article VII Scope of study in the Article 10 Application and include sediment control plans and methods pertaining to both the project facility and RTF.

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						feasible) and proposed installation methods of the underwater transmission facility should be provided. This should include a general description of the HDD layouts and cofferdam locations for transitioning the underwater cable upland at both of the proposed landfall (mainland and Galloo Island) locations. Potential impacts on aquatic ecology and water quality, including identification of the locations and description of potential impacts to operations of surface water intakes within Lake Ontario, should be reported. (Staff recommends advancing a complete scope of studies for development of an Article VII application in addition to the general comment provided here. Such studies should include a geotechnical survey of the bathymetric conditions along proposed route of the underwater transmission facility.)	
154	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Visual Impact Assessment	Exhibit 24 - Visual Impacts	DPS advises that the reference to the methodology developed by "the State of Vermont (2012)" is not relevant to New York State, being based in large part on legal opinions and court decisions for land use projects under an entirely different regulatory standard in that state.	Comment noted. Study will be consistent and compliant with NYS regulations and practices.
155	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Character and Visual Quality of the Existing Landscape	Exhibit 24 - Visual Impacts	As stated in the PSS, there is potential for mis-interpretation of the proposed Visual Study Area: the PSS states "it is proposed to include areas between 5 and 15 miles from the Facility to identify any regionally significant areas or resources of concern" (PSS, p. 115). DPS advises that there are significant visual receptor locations within 5 miles of the Facility site, and one interpretation of the PSS as drafted would omit those locations, instead focusing on the "areas between 5 and 15 miles from the Facility" (Id. at page 115).	The Applicant wishes to ease the mind of anyone that may misinterpret the information referenced by the commenter. The visual study area will extend out to 15 miles as indicated in the following statement in PSS Section 2.24(a)(1): "The 15-mile Visual Study Area boundaries for the Facility include approximately 649 square miles (see Figure 6)." The visual study will include a 5-mile study area and a 15-mile study area, as depicted on PSS Figure 6.
156	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Visibility of the Facility	Exhibit 24 - Visual Impacts	Referring to field verification of likely visibility of proposed Facility structures, the PSS states "[t]his determination will be made based on the visibility of Galloo Island and/or helium filled balloons that provide a locational and scale reference for the proposed Facility" (Id. at page 116). DPS advises that some important viewing locations in the Study Area do not have direct views of Galloo Island due to intervening topography or vegetation, but would have views of tall wind turbine structures, blades, and lighting. DPS advises that details of a plan for balloon launch and field verification should be provided for review in developing scoping stipulations.	Potential visibility of turbines from points of interest can be reliably determined geometrically by capturing the elevation of the observation point, bearing to the project facilities and azimuth of any interceding vegetation, topography or other obstruction and photodocumenting same. Conversely the visibility of balloons at a range of 6 to 15 miles away under typical atmospheric conditions makes ballooning an inherently less reliable methodology of confirming visibility potential turbine visibility. The Applicant believes the value of ballooning versus the risks it presents warrants further discussion with DPS during the stipulation process.
157	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Visibility of Above-ground Interconnections and Roadways	Exhibit 24 - Visual Impacts	The PSS states that "no viewshed analysis of other Facility infrastructure (other than the meteorological towers) is proposed" (Id. at page 116). DPS advises that the Facility and the Related Transmission Facility Substation location is within 2 miles of the NRHP-listed Galloo Island Lighthouse and NYS DEC Lighthouse Property, a NYS Wildlife Management Area on Galloo Island; and is nearby to NYS DEC Wildlife Management Area parcel on Little Galloo Island; as well as the designated Coastal Area comprising the setting of the Project at Galloo Island. While the substation will have a much lower profile than the proposed wind turbines, visibility of the proposed substation including lighting should be considered in the visual assessment, particularly from nearby viewpoints.	Viewshed analysis focusing on turbine visibility is considered appropriate since the turbines are the dominant visual element of the project, and likely the only project facilities that will be clearly visible from the mainland. Given the limited visitation received by the resources identified in this comment, viewshed analysis of the substation is not considered necessary. However, a sub-viewshed analysis for the proposed collector substation on Galloo Island will be prepared and included in the application. Visibility and/or appearance of the proposed substation will be evaluated during fieldwork and in the preparation and evaluation of the simulations.
158	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Appearance of the Facility Upon Completion	Exhibit 24 - Visual Impacts	DPS advises that photographic simulations should include the proposed substation, as per preceding comment.	As indicated in the previous response, the proposed substation will be included in any simulation in which it would be visible.
159	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Lighting	Exhibit 24 - Visual Impacts	The PSS includes typographical error: "phots" should be "photographs" (PSS, pg. 117).	Comment noted.

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160	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Lighting	Exhibit 24 - Visual Impacts	DPS advises that discussion of lighting should include any lighting to be used at the 'high' side as well as the "low side of the collection substation." (Id., pg. 117). As discussed throughout DPS comments on the PSS document, cumulative assessment of the Project warrants including the entire substation in the visual assessment of the proposed Generating Facility.	Lighting for both the low and high side of the collection substation will be described in the application.
161	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Lighting	Exhibit 24 - Visual Impacts	DPS advises that Facility and Project lighting should be designed to avoid off-site impacts including light trespass and dark-sky degradation. Lighting control plans generally should give consideration to the use of additional measures including: task lighting, that can be turned on when needed at areas that may require occasional night-time work such as O&M yards; full-cutoff fixtures without drop-down optics, that preclude horizontal or upward-directed light emissions that are not useful or necessary; and review of radar-activated FAA marking lights for night-time use, that are generally only lighted when aircraft approach and trigger activation of lighting for aviation safety.	See response to comment above.
162	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Nature and Degree of Visual Change from Operation	Exhibit 24 - Visual Impacts	PSS states that "[t]he methodology utilized in this evaluation will be a simplified version of the U.S. Department of the Interior, Bureau of Land Management ("BLM") contrast rating methodology (USDOI BLM, 1980) that was developed by EDR" (PSS, pg. 118). DPS advises for clarification that the BLM contrast rating methodology was not developed by EDR. DPS requests that applicant provide copies of EDR's text or outline of methodology, guidance documents, and any rating criteria, rating forms, or other documentation of the proposed methodology, for consideration by parties in scoping and development of stipulations.	With respect to development of the BLM rating methodology, the language in the PSS was not intended to suggest that the BLM methodology was developed by EDR, rather than a simplified version of the BLM developed methodology was developed by EDR. With respect to the rating form to be used in support of the VIA for the Galloo Island Wind Energy Facility, a copy of this form is attached to this comment response document (Attachment E). With respect to use of a rating panel, instruction to the rating panel, rating criteria, etc. a detailed description of this process is provided in PSS Section 2.24(b)(7).
163	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Operational Effects of the Facility	Exhibit 24 - Visual Impacts	PSS reasons that shadow flicker is not necessary, due to permanent residences being located far from the Facility site. DPS advises that the scope should consider potential for shadow flicker on proposed residential accommodations for facility workers at existing residential structures and O&M building, as well as the NRHP-listed Galloo Island Lighthouse and keeper's residence structures and the US Coast Guard buildings. (See other DPS comments regarding shadow flicker above at review of Section 2.15.)	Shadow flicker analyses are conducted on fixed points such as a residential home and the results of the analysis are a quantification of potential shadow flicker hours, on a set of fixed points, over the course of a calendar year (e.g., Point A is modeled to receive 10 hours of shadow flicker per year). Given the Galloo Island is uninhabited, the Applicant requests clarification/identification of "all potential receptors sensitive to shadow flicker within the island". With respect to National Register of Historic Places (NRHP) resources, there are only two such listed resources on the island (the Lighthouse and attached Keeper's House, and the Fog Horn House). The Application will qualitatively discuss the potential effects of shadow flicker on the island's NRHP-listed resources.
164	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Measures to Mitigate for Visual Impacts	Exhibit 24 - Visual Impacts	PSS states "Mitigation options for the operating Facility are limited, given the nature of the Facility and its siting criteria (tall structures on high elevation sites)" (PSS, pg. 119). DPS advises that proposed structure sites are not referenced as "high elevation" at any other reference in the PSS. Applicant should explain whether the proposal is to significantly raise the elevation of wind turbine sites on Galloo Island; and if so, to indicate the proposed site elevations, and propose revisions to other sections of the PSS as appropriate to reflect this design proposal.	The commenter is correct and reference to "high elevation sites" should not have been included in the PSS. The Applicant does not intend to raise the elevation of the wind turbine sites on Galloo Island.
165	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Measures to Mitigate for Visual Impacts	Exhibit 24 - Visual Impacts	DPS advises that the reference citation to "NYSDEC Program Policy (NYSDEC, 2000)" at page should also be used at paragraph (a) Visual Impact Assessment, at citation on PSS page 114, indicated as "New York State Department of Environmental Conservation (not dated)."	These are two different documents with different content. The DEC Aesthetics Handbook (NYSDEC, not dated) includes more discussion of visual and aesthetic impact analysis than the NYSDEC Program Policy (NYSDEC, 2000), and is the more appropriate reference where it is cited.

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166	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Description of Visual Resources to be Affected	Exhibit 24 - Visual Impacts	The PSS specifically identifies only four sensitive visual resources, which are all NYS State Parks. There are many other visual resources that should be listed as an initial inventory for the visual impact assessment. DPS requests that the applicant provide a list of known resources to advance consideration of sensitive visual receptor locations in outreach and consultation efforts.	The Applicant is developing the requested information, all of which will be summarized, mapped, described, etc. in a document to be prepared and circulated to visual stakeholders in an effort to create a comprehensive database of visually sensitive resources.
167	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Description of Visual Resources to be Affected	Exhibit 24 - Visual Impacts	DPS advises that the process of soliciting input from municipal and agency representatives would be greatly enhanced by the Applicant providing: - photographs of representative landscape settings from various resource locations in the Study Area; - mapping of visually sensitive resource locations, mapping of landscape similarity zones, as well as mapping of foreground, middleground and background distance zones, so that all such locations and zones are readily related graphically to areas of predicted visibility (viewshed maps); - results of Historic Architectural studies to identify any NRHP- listed or - eligible resource locations; and - initial recommendations by the Applicant as to its proposal for selecting viewpoints and a summary of the supporting rationale for its recommendations.	These recommendations will be taken into consideration as the Applicant develops the material referenced in the response immediately above.
168	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Viewshed Maps	Exhibit 24 - Visual Impacts	DPS advises that the PSS discussion of line of sight profiles (PSS pg. 120) should be revised to the extent that viewshed analysis does not completely substitute for graphic line of sight analysis in consideration of facility component location, screening vegetation heights, and consideration of mitigation measures. This may be of particular importance in documenting potential visibility in low-terrain landscapes such as the Project setting.	As stated in the PSS and in the above responses, a detailed viewshed analysis will be prepared for the proposed Facility. This viewshed is intended to indicate generally visibility within a 15-mile radius. In addition, line of sight profiles will be developed for critical sensitive sites within the visual study will be prepared to graphically illustrate the potential project visibility and the effect of existing screening on Project visibility, and/or the potential effect of any proposed mitigation measures.
169	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Viewshed Methodology	Exhibit 24 - Visual Impacts	Discussion of "vegetation viewshed" and use of 2011 NLCD land cover data should provide consideration of potential land cover modifications. 2011 USGS National Land Cover Dataset is based on data now five years old. Provide an assessment of significant areas of forest clearing that may have occurred in the Project Study Area based on evaluation of recent edition aerial photography and comparison of NLCD forest cover areas.	The Applicant will utilize the most up-to-date vegetation mapping available. Given the character/use of the landscape within the visual study area, it is unlikely that significant forest clearing has occurred in the area. However, prior to running the vegetation viewshed analysis current aerial photos will be reviewed to determine if there have been significant changes to large blocks of forest in the area.
170	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Viewshed Methodology	Exhibit 24 - Visual Impacts	Provide consideration of using NLCD USFS Tree Canopy Analytical Data (percent tree canopy cover, and standard error analysis) versus Tree Canopy Cartographic data, to provide characterization of degree of screening provided by forest canopy.	For the vegetation viewshed analysis the Applicant intends to use the 2011 NLCD with an assumed tree height of 40 feet for all forested cover types. We will review the feasibility of using USFS Tree Canopy Analytical Data and Tree Company Cartographic Data to provide a characterization of the degree of screening provided by the forest canopy, and will discuss this with DPS during the stipulation process. However, it should be kept in mind that the viewshed analysis is only the first step in evaluating potential project visibility, and is not intended to be a definitive assessment of actual project visibility.
171	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Viewpoint Selection	Exhibit 24 - Visual Impacts	Consultation with state, regional and local agencies and stakeholder interest groups should be made upon development of preliminary Project layout and viewshed mapping of areas of predicted Project Visibility to solicit input on resources and locations within areas potentially affected. Since proposed turbine locations, maximum turbine height, and study area distance are already known, preliminary viewshed maps can be readily prepared and provided to stakeholders for consideration in finalizing visual scoping.	As indicated above, the Applicant is in the process of developing various materials that will support the identification of visually sensitive resources through consultations with visual stakeholders. Ultimately, this consultation process will also include outreach to identify viewpoints for use in visual simulations, as described in PSS Section 2.24(b)(4).
172	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Viewpoint Selection	Exhibit 24 - Visual Impacts	DPS recommends that NYS agencies and municipal planning representatives be consulted directly at working meetings convened to achieve consensus on selection of viewpoints. Review of project viewshed mapping, landscape similarity zones, distance zones and known visual resource locations will advance consultation efforts.	The consultation process identified by the commenter is described in PSS Section 2.24(b)(4).

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173	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Viewpoint Selection	Exhibit 24 - Visual Impacts	DPS recommends including NYS Dept. of State Coastal Resources bureau staff in the list of agencies to be consulted.	Comment noted.
174	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Additional Simulations Illustrating Mitigation	Exhibit 24 - Visual Impacts	DPS advises that the stated rationale for limiting depiction of mitigation to previous assessment of alternate arrangements of the Hounsfield Wind Project is mis-placed: the analysis of Hounsfield is an assessment of "alternate number, height and arrangement of turbines" (PSS, pg. 123). Thus this proposal is an alternatives assessment, not a mitigation assessment.	Due to the nature of the project and the distance to the island, typical visual mitigation measures (i.e., vegetation screening) may not be applicable. Therefore, the Applicant will work with DPS, NYSOPRHP and other agencies/stakeholders to identify suitable mitigation measures as part of the VIA development.
175	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Additional Simulations Illustrating Mitigation	Exhibit 24 - Visual Impacts	Since no analysis of impacts of the present project has been presented, there is no specific basis for stipulating what mitigation may be appropriate. Mitigation options that are available to the Galloo Island project may include measures such as: moving or re-arranging turbines to meet appropriate setback distances or to avoid site-specific impacts on facilities or resources; deleting one or more turbines; moving the southern met tower away from the NRHP-listed Galloo Island Lighthouse; using RADAR-activated aviation warning lights; providing screen plantings near visual receptor locations; or other mitigation measures as appropriate to identified impacts at particular receptor locations.	Comment noted.
176	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Simulation Rating and Assessment of Visual Impact	Exhibit 24 - Visual Impacts	DPS requests that the proposed rating forms and instruction pages be provided for consideration in scoping.	As previously indicated, a copy of the rating form to be used in support of the VIA for the Galloo Island Wind Energy Facility is attached to this comment response document, and with respect to use of a rating panel, instruction to the rating panel, rating criteria, etc. a detailed description of this process is provided in PSS Section 2.24(b)(7).
177	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.24	Section 2.24 - Visual Impacts - Simulation Rating and Assessment of Visual Impact	Exhibit 24 - Visual Impacts	DPS requests that the application include information regarding the professional review panel members. The scope should specify that CV of rating panel members will be provided, along with list of previous major project visual impact assessment experience.	Comment noted. The CV or resume of rating panel members, along with a list of visual impact assessment experience, will be included with the Article 10 Application.
178	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.25	Section 2.25 - Effect on Transportation - Conceptual Site Plan	Exhibit 25 - Effect on Transportation	DPS advises that for wind turbine access road locations and widths, the application should include characterizations of road location suitability. The proposed access road through the collection and voltage step-up substation should be evaluated for clearances and suitability for co-locating these facility and Related Transmission Facility components, as indicated at PSS Figure 3.	As previously indicated in response to a similar comment, the specific location of project components will be presented in the Article 10 Application.
179	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.25	Section 2.25 - Effect on Transportation - Description of the Pre-construction Characteristics of Roads in the Area	Exhibit 25 - Effect on Transportation	DPS advises that a characterization of the types, dimensions, weight and amount of equipment and material that would be delivered and transferred for delivery to Galloo Island from the Madison Barracks Marina, Henderson Harbor and Point Peninsula locations should be provided for consideration in scoping.	Comment noted. This information will be provided in the Route Evaluation and Transportation Study as discussed in Section 2.25 of the PSS.
180	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.25	Section 2.25 - Effect on Transportation - Description of the Pre-construction Characteristics of Roads in the Area	Exhibit 25 - Effect on Transportation	DPS advises that roads in the areas of identified points of embarkation should be reviewed for available load bearing and structural rating information for expected facility traffic routes. This should also be performed for structural integrity of points of embarkation (for applicable oversized/overweight road deliveries).	Comment noted. This information will be provided in the Route Evaluation and Transportation Study as discussed in Section 2.25 of the PSS.

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181	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.27	Section 2.27 - Socioeconomic Effects - Consistency with State Smart Growth Public Infrastructure Criteria	Exhibit 27 - Socioeconomic Effects	The PSS mistakenly concludes that the Smart Growth Infrastructure Criteria do not apply to the proposed project. The smart growth criteria set forth in ECL § 6-0107 are required to be evaluated as set forth in 16 NYCRR 1001.26. DPS advises that this is a required evaluation of reasonable planning goals, objectives and considerations for major infrastructure projects, in this case a major electric generating facility. The other requirements of ECL § 6-0107 do not apply to the project. (The PSS dismissal of NYS Department of State approval at page 142 is incorrect and is addressed in other sections of this document, notably discussion of Land Use and Coastal Area evaluations.)	The Application will include an evaluation of the smart growth infrastructure criteria.
182	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.31	Section 2.31 - Local Laws and Ordinances	Exhibit 31 - Local Laws and Ordinances	DPS requests that complete copies of local laws, regulations, ordinances, and resolutions be provided in an appendix to the application.	Comment noted. The requested information will be included in the Article 10 Application.
183	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.31	Section 2.31 - Local Laws and Ordinances - Local Procedural Requirements Requiring Board Authorization	Exhibit 31 - Local Laws and Ordinances	DPS recommends that applicant consider requesting local review of building permits; water and wastewater treatment permits; and occupancy permits for O&M and residential-type buildings; etc. In the alternative, the applicant should explain the basis for not requesting this authorization, and the authority and means by which such permits would be issued.	Comment noted. As stated in PSS Section 2.31(c) The Applicant will consult with the Town of Hounsfield and the County of Jefferson to identify who shall review and approve the building plans, inspect the work, and certify compliance with the New York State Uniform Fire Prevention and Building Code, the Energy Conservation Construction Code of New York State, and the substantive provisions of any applicable local electrical, plumbing or building code. In the Application the Applicant will describe any preliminary arrangements made between the Applicant and the entity that shall perform the review, approval, inspection, and compliance certification, including any arrangements made to pay for the cost thereof including the costs for any consultant services necessary due to the complex nature of such facilities.
184	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.32	Section 2.32 - State Law and Regulations - List of State Approvals, Consents, Permits, Certificates, or Other Conditions of a Procedural Nature	Exhibit 32 - State Law and Regulations	DPS advises that the Siting Board regulations specifically delegate Section 401 Water Quality Certification to DPS, rather than to NYS DEC. DPS agrees that request for 401 WQC should not be filed until a federal ACOE permit application is filed; however the Article 10 Application should identify the 401 WQC as a permit to be requested in the future.	The Article 10 Application will identify the 401 Water Quality Certification as a permit to be requested in the future.
185	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.32	Section 2.32 - State Law and Regulations - List of State Approvals, Consents, Permits, Certificates, or Other Conditions of a Procedural Nature	Exhibit 32 - State Law and Regulations	DPS advises that future communications and consultation with OPRHP regarding §14.09 of the New York State Historic Preservation Act should involve DPS as the principal agency with responsibility for consultation under that statute. To date, DPS has not been involved or made aware of any such communications or consultation with OPRHP by the Applicant.	DPS Staff will be made aware of, and invited to, all future meetings with OPRHP. With respect to DPS Staff not being involved in, or made aware of, previous consultations with OPRHP, the applicant notes that on March 8, 2016 the Applicant attended a meeting with OPRHP at their office, which DPS was invited to and participated in by phone.
186	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.32	Section 2.32 - State Law and Regulations - List of State Approvals, Consents, Permits, Certificates, or Other Conditions of a Procedural Nature	Exhibit 32 - State Law and Regulations	DPS advises that the NYS Department of State's (DOS) consistency review is authorized by federal law and is an integral part of the federal decision-making process. DOS's review is not authorized by State law, is not a delegated federal authority and is not supplanted by the PSL Article 10 process. Rather, the Siting Board has responsibility for review of Coastal Area policy conformance, pursuant to Executive Law (see comment above regarding PSS section 2.4(l)).	Comment noted.
187	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.32	Section 2.32 - State Law and Regulations - List of State Approvals, Consents, Permits, Certificates, or Other Conditions of a Procedural Nature	Exhibit 32 - State Law and Regulations	DPS further advises that lease for underwater lands of New York State for installation of facilities must be sought from NYS Office of General Services.	The Applicant is aware of this requirement and will discuss in the Article VII Application.

Comment Number	Commenter/Date	Date of Comment	PSS Section	PSS Section and Title	Corresponding Application Exhibit Number and Title	Comment (Per Commenter)	Applicant Response
188	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.32	Section 2.32 - State Law and Regulations - State Approvals/Permits/Etc. for Offsite Features Not Encompassed by Major Electric Generating Facility	Exhibit 32 - State Law and Regulations	DPS reiterates its comment that PSL §168.2 requires cumulative assessment of impacts associated with the overall Project, not only the Article VII facility components. Characterization and summary of probable environmental impacts of the Related Transmission Facility and any other related facilities should be reported in the Article 10 Application.	Comment noted.
189	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	2.33	Section 2.33 - Other Applications and Filings - Federal Permits, Consents, Approvals, or Licenses Required for Construction or Operation	Exhibit 33 - Other Applications and Filings	DPS advises that NYS Department of State (DOS), not the NYS Office of General Services (OGS), provides a federal consistency decision pursuant to 15 CFR 930. The DOS federal consistency determination is authorized by the Coastal Zone Management Act of 1972, as amended, and is binding on all federal agencies with jurisdiction to authorize, fund or directly undertake an activity associated with the project that may have direct or indirect effects on land and water uses or natural resources on the State's designated coastal area (CZMA section 307). No federal agency may provide an authorization for a project that is denied concurrence with an applicant's consistency certification by the NYS Department of State (15 CFR Part 930.63).	Comment noted.
190	Andrea Corbin New York State Department of Public Service June 28, 2016	6/28/2016	Appendix D	Appendix D - Master List of Stakeholders	NA	Several listed organizations do not include direct point-of-contact information, as listed below. DPS advises that the applicant should continue to update and refine its Stakeholder contacts and outreach efforts through the pre-application process, and include a contact name for each stakeholder without a contact name. - Hay Memorial Library - Henderson Free Library - Oswego Public Library - Air Methods Helicopter Rescue Watertown NY - Kingston Norman Rogers Airport	The Applicant will identify point-of-contact information for the entities identified by the commenter, and will continue to update and refine its stakeholder contact list.
191	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza Albany, NY 12237 July 8, 2016	7/8/2016	2.15	Section 2.15 - Public Health and Safety	Exhibit 15 - Public Health and Safety	The Preliminary Scoping Statement (PSS) indicates that public health impacts will be negligible due to the remote location of the project. While Galloo Island is currently uninhabited, the existing home (currently listed on-line for sale) and a proposed dormitory intended to house construction workers may provide future residence(s) on the island. Unless there will be assurances, provisions, deed restrictions or other mechanisms to prevent future occupancy (seasonal or permanent) of these structures, potential public health impacts at these locations should be considered. Also, if the lighthouse is publicly accessible, the application should consider whether there will be any potential, albeit short duration, impacts to boating visitors who may use the natural harbors present on the island.	The application will include discussion of potential health impacts any facilities that might be used for temporary overnight accommodation.
192	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza Albany, NY 12237 July 8, 2016	7/8/2016	2.2	Section 2.2 - Overview and Public Involvement	Exhibit 2 - Overview and Public Involvement	The PSS indicates that the high-voltage transmission cable will undergo a separate Article 7 proceeding. However, because the connection to the high-voltage transmission cable is necessary for this facility, health and safety impacts to potentially affected residents and recreational users of Lake Ontario associated with construction and operation of the transmission cable should be considered as part of the Article 10 application.	Potential impacts associated with the Article VII transmission facilities will be assessed in the Article VII application. Article 10 and Article VII are two distinct statutory schemes with separate requirements. In order to avoid confusion, the Applicant will address potential construction and operation impacts of the high-voltage transmission cable to potentially affected residents and recreational users in the Article VII application. Potential cumulative impacts, such as visual impacts, of both the Article 10 facilities and Article VII facilities will be addressed as noted throughout these comment responses.
193	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza	7/8/2016	2.15	Section 2.15 - Public Health and Safety	Exhibit 15 - Public Health and Safety	The PSS indicates that the application will explore potential impacts related to construction of the facility. The Article 10 application should include any potential public health impacts associated with increased accidents and noise associated with traffic, as well as emissions to air during construction activities (e.g., emissions from the batch plant, truck traffic, and barge activities at docks). The application should also include discussion of alternatives or approaches to mitigate impacts.	Commented noted. Exhibit 25 of the Article 10 Application will include a description and discussion of Transportation Effects associated with the Facilities operation and Construction. Exhibit 17 of the Article 10 Application will include an assessment and discussion of any potential air emissions associated with the construction and operation of the Facility.

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	Albany, NY 12237 July 8, 2016						
194	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza Albany, NY 12237 July 8, 2016	7/8/2016	2.19	Section 2.19 - Noise and Vibration	Exhibit 19 - Noise and Vibration	The PSS indicates that a pre-construction (winter-time) and post-construction (season unspecified) sound surveys will be conducted for a Noise Impact Assessment, using three sound monitoring locations (one on Galloo Island, two on the mainland in the Towns of Lyme and Henderson). The applicant should provide a rationale for the selection and appropriateness of these three sites and also consider a monitoring location at the seasonal residential site on Stony Island which is closer to the project than the mainland. In addition to the World Health Organization's (WHO) "Guidelines for Community Noise" (1999), guidelines listed in WHO's 2009 "Night Noise Guidelines for Europe," which is an extension to – and update of – WHO's 1999 guidance, should be used to evaluate the project's potential noise impacts. <sup>1</sup>	The two sites on the mainland represent the nearest sensitive receptors in any direction. The measurement site on Galloo Island measured sound levels representative of Stony Island today without any wind turbines on either island. Stony Island is a privately owned island and as such the Applicant does not have access. Both the 1999 and 2009 WHO Guidelines will be used to evaluate sound levels from the Facility at noise-sensitive receptors.
195	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza Albany, NY 12237 July 8, 2016	7/8/2016	2.15	Section 2.15 - Public Health and Safety	Exhibit 15 - Public Health and Safety	The PSS indicates that, due the remote nature of the project, public health impacts associated with "shadow flicker" will be negligible and that a shadow flicker analysis is unnecessary. This statement is based on an analysis that show flicker impacts are generally considered negligible at distances beyond roughly 10 rotor diameters, citing two studies that are not identified in the PSS reference list (see top of page 61). The rotor diameters of the turbines should be identified in the PSS to increase transparency. Either the applicant should provide sufficient information in the PSS to support the conclusion that a shadow flicker analysis is not necessary, or it should conduct an analysis of shadow flicker which includes worst-case seasonal and time of day solar zenith angles.	Comment noted. While the effects of shadow flicker are anticipated to be imperceptible due to the distances to nearest receptors (beyond 10 rotor diameters), the Application will include a shadow flicker study.
196	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza Albany, NY 12237 July 8, 2016	7/8/2016	2.28	Section 2.28 - Environmental Justice	Exhibit 28 - Environmental Justice	The PSS identifies two potential environmental justice (EJ) communities in the Towns of Cape Vincent and Clayton. However, the New York State Department of Environmental Conservation's potential EJ map also identifies a portion of the City of Watertown, which is a similar distance to the project as the communities identified in the PSS. Additionally, the application should include a map of the nearest potential EJ areas.	The commenter is correct that the City of Watertown is a potential Environmental Justice area. It should be noted that the PSS identified the nearest EJ areas to the Facility which are approximately 18 miles from the Facility. The City of Watertown is greater than 18 miles from the Facility. These EJ areas were identified to demonstrate that no EJ areas are in close proximity to the Facility and that the closest EJ areas are well outside the required study areas under 6 NYCRR 487.  Because it is sited so far from the nearest Potential Environmental Justice Area, the Facility is not expected to have an impact on any Environmental Justice areas and the full Environmental Justice Analysis required by 6 NYCRR 487.6 is not required.
197	Richard Thomas Assistant Counsel Bureau House of Counsel Department of Health Corning Tower Empire State Plaza Albany, NY 12237 July 8, 2016	7/8/2016	2.21	Section 2.21 - Geology, Seismology, and Soils	Exhibit 21 - Geology, Seismology, and Soils	The PSS indicates that there is one potable water well on Galloo Island. The applicants should assess the quantity and quality of this well prior to blasting and drilling activities and verify that it is suitable for use as a source of drinking water.	Comment noted. The Article 10 Application will include a discussion of any quantity and quality of any potable water well on Galloo Island.