



ALTONA WIND REPOWERING PROJECT

MATTER NO. 23-03029

16 NYCRR § 1100-2.3 Exhibit 2

Revision 1

Overview and Public Involvement

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ACRONYM LIST

ADLS	aircraft detection lighting system
APA	Adirondack Park Agency
BMP	best management practice
CLCPA	Climate Leadership and Community Protection Act
CO ₂	carbon dioxide
FAA	Federal Aviation Administration
FTE	full time equivalent
kV	kilovolts
LOD	Limits of Disturbance
MET	meteorological
MSG	Mineral Soils Group
MW	megawatts
NCBP	Net Conservation Benefit Plan
NYCRR	New York Codes, Rules, and Regulations
NYSDEC	New York State Department of Environmental Conservation
O&M	operations and maintenance
OPRHP	New York State Office of Parks, Recreation and Historic Preservation
ORES	Office of Renewable Energy Siting and Electric Transmission
PILOT	Payment in Lieu of Taxes
SEP	State Energy Plan
SEQRA	State Environmental Quality Review Act
USC	Uniform Standards and Conditions
VIA	visual impact assessment
VSA	visual study area

GLOSSARY TERMS

Key terms used frequently in this Application are defined below:

Applicant: Means Valcour Altona NewCo, LLC.

Existing Facility: Refers to the existing 97.5-megawatt (MW) wind energy facility and its components located in the Town of Altona, Clinton County, New York, and commonly known as the Altona Windpark.

Facility Site: Refers to those privately owned parcels under option to lease, purchase, create an easement, or other real property interests with the Applicant on which all Repowered Facility components will be sited, including roads, collector lines, and interconnection with the electrical grid.

Limits of Disturbance: Refers to the portion of the Facility Site that will necessarily be utilized to facilitate construction and operation of the Repowered Facility, including temporary workspaces.

Repowered Facility: Refers to the Altona Wind Repowering Project, an approximately 107.5 MW wind energy generation facility located in the Town of Altona, Clinton County, New York, that will consist of new wind turbines, access roads, buried electric collection lines, collection substation facility improvements, temporary laydown and parking, permanent meteorological towers, and an aircraft detection lighting system tower. The Repowered Facility will reuse other existing aboveground components, including overhead collection lines, access roads, an operations and maintenance building, a 34.5-kilovolt (kV) to 230 kV collection substation; and a point of interconnection switchyard station owned by the New York Power Authority.

Study Area: Refers to the area evaluated for specific resource identification and/or resource impact assessment. The size of this area is appropriate for the target resource and takes into account the project setting, the significance of the resource or impact being identified or evaluated, and the specific survey distances included in 16 New York Codes, Rules, and Regulations Part 1100. Unless indicated otherwise in a specific exhibit, the Study Area represents the area within a 5-mile radius of the Facility Site.

16 NYCRR § 1100-2.3 Exhibit 2: Overview and Public Involvement

Information	Found in Section
Exhibit 2 shall contain:	
A brief description of the major components of the facility, including collection lines, transmission lines, interconnections, access roads and related facilities. A brief, clearly and concisely written overall analysis in plain language that assembles and presents relevant and material facts regarding the facility upon which the applicant proposes that the Office make its decision. The analysis shall be analytical and not encyclopedic and shall specifically address each required finding, determination and consideration the Office shall make or consider in its decision and explain why the applicant believes that the requested permit should be granted.	2.1 Appendix 2-A Figures
A brief description of applicant's local engagement and outreach efforts as required in sections 1100- 1.3(a) and (b) of this Part.	2.2.1 and 2.2.2 Appendix 2-B Appendix 2-C Appendix 2-D

2.0 EXHIBIT 2 – OVERVIEW AND PUBLIC INVOLVEMENT

2.1 PROJECT OVERVIEW (16 NYCRR §1100-2.3 (a))

AES is undertaking facility-wide, programmatic repowering of a portfolio of six operating wind projects in Clinton, Franklin, and Wyoming Counties, including the Altona Windpark (Existing Facility) in Clinton County, extending the benefits for landowners, the towns, and school districts for up to 30 years following the repowering. These repowered facilities embody AES's sustainability philosophy and contribute to the transition to clean energy with the use of more efficient technologies. Development of any large-scale renewable energy project requires careful balancing of numerous factors, resources, and concerns—from the availability of private land and suitable access to the state's electric grid, to the presence of protected resources and matters of importance to the host community. Valcour Altona NewCo, LLC (the Applicant) developed the design for the Altona Wind Repowering Project (Repowered Facility) over the course of several years, taking into account feedback provided by the landowners and the community during early-stage consultations, and surveys of sensitive resources to avoid and minimize impacts. The proposed Repowered Facility strikes a careful balance across a wide array of competing concerns. The Repowered Facility will avoid, minimize, and mitigate any impacts to the maximum extent practicable through careful design, implementation of best management practices (BMPs), state-mandated Uniform Standards and Conditions (USCs), and via proposed mitigation measures for protected species and wetland mitigation.

New York State recognized the pressing need for concrete action to combat climate change by adopting the New York State Climate Leadership and Community Protection Act (CLCPA), which acknowledges that decarbonization of New York's energy grid will require broad deployment of renewable energy across the entire state, through both large and small projects. It will not be possible to achieve the CLCPA's renewable energy mandates without utility-scale wind projects like the Repowered Facility. New York is facing a challenge in attempting to decarbonize the grid, and it will require unprecedented changes across the entire State to meet the goals of the CLCPA. However, this effort also represents a significant opportunity to drive private investment and job creation to allow some of the community's hard-working farmers and landowners to earn an income from lands leased to wind projects, and to generate annual payments to local schools and taxing jurisdictions.

The Existing Facility consists of 65 wind turbines, each with 1.5 MW of capacity and a total capacity of 97.5 MW. The Altona Town Board approved the construction, operation and decommissioning of the Existing Facility in 2006, following completion of State Environmental Quality Review Act (SEQRA) review under 6 New York Codes, Rules, and Regulations (NYCRR) 617.6. The Existing Facility was reviewed jointly with the existing Clinton and Ellenburg wind energy facilities in a single SEQRA review process, which included completion of a joint final environmental impact statement and a joint findings statement for all three projects. The Applicant is in discussions with the Town of Altona regarding the implementation of the decommissioning plan for the Existing Facility.

The Repowered Facility will reduce the total number of wind turbines by at the Existing Facility by least 40, and will install up to 25 wind turbines that will generate up to approximately 107.5 megawatts (MW) of electrical energy. Each new turbine will have a generating capacity three to four times greater than the Existing Facility turbines. The Repowered Facility will continue to safely generate enough clean, renewable electricity to power more than 19,300 New York households. The Applicant expects to commence operation in 2028 and anticipates operating the Repowered Facility for up to 30 years.

The Repowered Facility will be located on the site of the Existing Facility with some additional area added to the Facility Site as shown in Figure 2-1. The Repowered Facility will incorporate 84 percent of the Existing Facility acreage and an additional 714 acres. The Repowered Facility will utilize certain portions of the Existing Facility's components and add new components as shown in Figure 2-2. The Repowered Facility will use existing overhead collection lines, access roads, operations and maintenance (O&M) building, 34.5-kilovolt (kV) to 230 kV collection substation, and point of interconnection switchyard station owned by the New York Power Authority (NYPA). Reusing existing access roads and collector lines, even where upgrades are required, reduces overall impacts compared to new construction. The Repowered Facility components include the following:

Wind Turbines: The Repowered Facility will include up to 25 turbines from either General Electric, Vestas, or Nordex ranging from 4.5 to 6.1 MW each, depending on the turbine selected. The maximum height of the turbines will be 650 feet. The turbines will be anchored to spread footer concrete foundations approximately 12 to 14 feet deep and 71 to 76 feet in diameter, depending on the turbine selected. All wind turbine components (including towers, nacelles, and rotors) will be painted or finished using low-reflectivity, neutral white colors painting and lighting consistent with consistent with Federal Aviation Administration (FAA) rules established in Advisory Circular 70/7460-1M: Obstruction Marking and Lighting. Each wind turbine will also be equipped with a lightning protection system to protect against physical damage caused by lightning strikes.

Aircraft Detection Lighting System (ADLS) Tower: The Repowered Facility will include a 165-foot ADLS tower (165 feet). The ADLS will turn on the aviation warning lights when an aircraft is detected and remain on until the aircraft exits the ADLS coverage area. The ADLS will comply with laws requiring light mitigation and reduce the duration of nighttime lighting compared to the Existing Facility.

Access Roads: Access roads will be used during construction and operation for delivery of materials and for access by construction and operating personnel. The Existing Facility access roads will be used or upgraded to the extent practicable, and new temporary access roads will be utilized during construction activities.

Electrical Collection System: The Repowered Facility will install new 34.5 kV collection lines that collect power from the inverters in each wind turbine and will use the Existing Facility

overhead collection lines to the maximum extent practical. The new electrical collection system will direct-buried. Cabling for the data communication system will be installed in the same trenches as the underground collection system or attached to the existing overhead collection system.

Electrical Interconnection System: The Repowered Facility will use the Existing Facility's interconnection to the New York power grid via the existing switchyard station in the Town of Altona, tapping into the New York Power Authority's Duley Substation. The switchyard station transforms the power generated by the wind turbines to match the specification of the interconnection with the electrical grid.

Meteorological Evaluation Tower (MET): The Repowered Facility will install two METs up to 402 feet tall will monitor meteorological conditions at the Repowered Facility.

Temporary Laydown Areas and Parking: Construction materials will be transported to the Facility Site and stored at temporary laydown areas. The laydown areas will provide parking for construction, staging of project components, construction equipment, and construction materials. In addition, each new turbine will require a temporary work area for component deliveries and staging, a crane pad, and other construction-related needs.

Temporary Marshalling Yard: Repowered Facility components such as turbines and nacelles will be delivered to a centralized marshalling yard before being distributed to laydown areas.

O&M Building: The Existing Facility O&M building will provide equipment storage and offices for administrative operations during the life of the Repowered Facility located on site, near the substation. The Existing Facility O&M building will not be modified.

2.1.1 Overall Analysis (16 NYCRR § 1100-2.3 (a))

Under 16 NYCRR § 1100-2.3(a), an Application for a Major Renewable Energy Facility Siting Permit must include a brief, clearly and concisely written overall analysis in plain language that assembles and presents relevant and material facts regarding the facility upon which the applicant proposes the Office of Renewable Energy Siting and Electric Transmission (ORES) make its decision. The analysis must be analytical and not encyclopedic and shall specifically address each required finding, determination, and consideration that ORES shall make or consider in its decision and explain why the applicant believes that the requested permit should be granted.

Throughout this Application, the Applicant has appropriately characterized the Repowered Facility setting and the reasonably probable environmental impacts from construction, operation, and decommissioning and has demonstrated that it has avoided, minimized, and mitigated significant adverse environmental impacts to the maximum extent practicable and consistent with other wind projects permitted by ORES and by the New York State Board on Electric Generation Siting and the Environment. This Application addresses the requirements of New York State Public Service Law Article VIII and 16 NYCRR Part 1100 with respect to the Repowered Facility. This Application

necessarily does not address the construction, operation and decommissioning of the Existing Facility nor the associated SEQRA reviews under 6 NYCRR § 617.6. In preparing this Application, consistent with 16 NYCRR Part 1100, the Applicant took into consideration factors that include but are not limited to:

- New disturbance to the Existing Facility footprint and new ground disturbance
- Size of the new Repowered Facility components (e.g. changes in height)
- New information (e.g., previously unknown impacts on a threatened or endangered species)

Furthermore, as summarized below, the Application provides sufficient information to enable ORES to make its required findings and determinations on avoidance, minimization, and mitigation; environmental and community benefits; and compliance with substantive requirements of local law, or waiver of substantive requirements of local law that the Applicant has demonstrated are unreasonably burdensome.

2.1.1.1 Summary of Avoidance, Minimization, and Mitigation

Through careful planning and design, the implementation of BMPs, and the nature of the technology proposed, the Applicant has demonstrated that potential significant adverse impacts will be avoided or minimized to the maximum extent practicable and proposes mitigation measures to offset the unavoidable impacts. Development of any large-scale renewable energy project requires a careful balancing of numerous factors, resources and concerns—from the availability of private land and suitable access to the state’s electric grid, to the presence of protected resources and matters of importance to the host community. The Repowered Facility plans to reuse the Existing Facility’s electrical system, access roads, O&M building, and collection substation. The Facility Site will include 31 of 34 parcels of the Existing Facility, while only adding 714 acres for the Repowered Facility. The proposed design strikes a careful balance across a wide array of competing concerns and limitations associated with the repowering of an existing, operational facility. As with any type of land development, the Repowered Facility will have some impacts. However, the impacts of the Repowered Facility have been avoided, minimized, and mitigated to the maximum extent practicable through careful design, implementation of BMPs and state-mandated USCs, and proposed mitigation measures. Specifically, as described below, the Repowered Facility completely avoids impacts on threatened and endangered species’ occupied habitat, streams and, cultural resources, and minimized, or will mitigate to the maximum extent practicable, impacts on wetlands, agricultural resources, and other environmental and ecological resources.

Streams and Wetlands

As described in Exhibit 13 Water Resources and Aquatic Ecology and Exhibit 14 Wetlands, the Applicant has designed the Repowered Facility to minimize and avoid impacts to the maximum extent practicable. Pursuant to 16 NYCRR § 1100-1.3(f) and as described in Exhibit 13, the

Applicant conducted a surface water delineation to determine the boundaries of all federal, state, and locally regulated streams and adjacent areas present within the study area (Appendix 14-B). The delineation identified three stream segments classified by the New York State Department of Environmental Conservation (NYSDEC) as Class C and no aquatic invasive species in these waters. Following consultation with NYSDEC, ORES issued a waterbodies jurisdictional determination for state-regulated waterbodies on December 5, 2024 (finding the three field-delineated surface waters as state-regulated (Appendix 13-B). The Repowered Facility will avoid impacts to all state-regulated waterbodies; avoiding two of the three through the use of horizontal directional drilling for the installation of underground collection lines on or adjacent to the access road.

Pursuant to 16 NYCRR § 1100-1.3(e), the Applicant also conducted a wetland delineation to determine the boundaries of all federal, state, and locally regulated wetlands and adjacent areas present within the Study Area (Appendix 14-B). Following consultation with NYSDEC, ORES issued a wetlands jurisdictional determination on December 5, 2024, finding 23 state-regulated wetlands either present within 500 feet of mapped state-regulated wetlands, hydrologically connected to other state-regulated wetlands, or exceeding the 12.4-acre threshold for state jurisdiction. Through the iterative siting process, the proposed design minimizes wetland impacts by siting the Repowered Facility on the Existing Facility site and through the reuse of existing infrastructure. The design avoids impacts on all but 1.49 acres of state-regulated wetlands; requiring 0.69 acres of mitigation at the ratios set forth in 16 NYCRR 1100-2.15 (g) Table 1 - Wetland Mitigation Requirements. The Conceptual Wetland Restoration and Mitigation Plan presents the options and approaches to achieve the necessary mitigation (Appendix 14-E).

Agricultural Resources

As described in Exhibit 15 Agricultural Resources, the Applicant designed the Repowered Facility to minimize and avoid, to the maximum extent practicable, impacts on prime agricultural soils, which are defined as Mineral Soils Groups (MSG) 1 through 4. Active agricultural land use – which includes all lands involved in the production of crops, livestock, and livestock products for three of the last five years – represents approximately 4,364 acres, or 5 percent of the Study Area, a radius of 5 miles around the Facility Site. Of this, only 261 acres or less than 6 percent of the active agricultural land in the Study Area falls within the Facility Site. Of the 261 acres, 47 acres will be temporarily impacted by construction activities but will be allowed to return to active agricultural use once the Repowered Facility is operational. The Facility Site contains 361 acres, or 8 percent, of MSG 3 within the Facility Site and 61 acres, or less than 1 percent, within the LOD. The Facility Site does not contain MSG 1, 2, or 4. The repowering will not permanently impact any lands that are both actively farmed and contain MSG 3. For the prime agricultural soils located within the Facility Site that cannot be avoided or minimized, the Applicant will adhere to BMPs, including the New York State Department of Agriculture’s 2018 Guidelines for Agricultural Mitigation for Wind Power Projects (Revision April 19, 2018), to the maximum extent practicable during construction to further limit impacts. The Repowered Facility layout reflects consideration of existing, ongoing, and adjacent farming practices based on consultation with agricultural

landowners during the Applicant's design process. In total, approximately 0.3 acres (or less than 1 percent) of active agriculture within the LOD will be permanently disturbed by project components.

The Applicant prepared an Agricultural Plan (Appendix 15-D), which outlines the Applicant's commitment to constructing the Repowered Facility in accordance with the New York State Department of Agriculture and Markets Guidelines, 16 NYCRR § 1100-2.16(c), and § 1100-6.4(b)(4), 6.4(s)(2) to ensure that soil health is maintained or improved throughout construction, operation, decommissioning, and restoration. Wind facilities are also a reversible land use, and at the end of the Repowered Facility's life, the land will be fully decommissioned and restored and will be available to return to agricultural use. Appendix 15-E Drainage Remediation Plan addresses potential inadvertent damage to surface and subsurface agricultural drainage features.

Cultural Resources

As described in Exhibit 9 Cultural Resources and pursuant to 16 NYCRR § 1100-1.3(h), the Applicant conducted a series of investigations to evaluate the presence of archaeological resources in the Study Area. The Applicant conducted a Phase 1A archaeological survey in August 2024 (Appendix 9-B) and Phase 1B archaeological survey in September 2024 (Appendix 9-C) for areas of specific ground disturbance for the construction of the Repowered Facility. On February 21, 2025, OPRHP approved the Phase 1A and concurred with the proposed workplan for the Phase 1B archaeological testing. On September 19, 2025, OPRHP concurred with the finding that no further study is required. All Phase 1A and Phase 1B documents were provided to the St. Regis Mohawk Tribe's Tribal Historic Preservation Office Director, and Exhibits 8 and 9 were submitted to the OPRHP.

The Applicant also prepared a historical architectural survey, through background research and a field inspection in November 2024. The architectural survey found 10 properties as listed, eligible, or recommended as eligible for listing in the SR/NRHP (Appendix 9-E). The Repowered Facility will not adversely affect these historic properties because it will not diminish the setting or feeling of the properties. The Adirondack Forest Preserve is an SR/NRHP property within the APE but it is not within the Facility Site. The Repowered Facility will have no direct impacts on the Adirondack Forest Preserve as only approximately 2 percent of the protected open space appears to be within the zone of visual impact, therefore it is WSP's opinion that the Repowered Facility will not diminish the setting or feeling of the Adirondack Forest Preserve. On September 4, 2025, OPRHP stated that they have no concerns regarding above ground historic resources.

Terrestrial Resources

As described in Exhibit 11 Terrestrial Ecology, the Study Area does not contain unique or rare natural communities based on the background data review, agency coordination, or on-site surveys. The design process for the Repowered Facility minimized impacts on vegetation through the reuse of a majority of the Existing Facility parcels and site, including built facilities such as the O&M facility, interconnection substation, and collection substation. The Repowered Facility will

be located primarily in forested areas previously disturbed for the Existing Facility or for timber production. The siting of the Repowered Facility avoids 3,374 acres, or 93 percent, of forested communities within the Facility Site. Approximately 249 acres of tree clearing will be required for construction and operation of Repowered Facility components for efficiencies with construction and design.

Changes in vegetation could influence the behavior of wildlife species; however, because lands within the Facility Site have been subjected to ongoing forest harvesting, agricultural use, and the existing wind turbine operations, it is not anticipated that the Repowered Facility will materially affect wildlife utilizing habitats in the area. The Repowered Facility could result in the loss of approximately 20 birds per year more than the Existing Facility and a reduction of impacts on bats by 55 to 78 percent compared to the Existing Facility. The Applicant also considered the cumulative impacts. The Repowered Facility contributes approximately 215 birds per year, or approximately 9 percent of the estimated annual mortality and approximately 144 to 360 bats per year, or approximately 5 to 7 percent per year of the estimated annual mortality. These impacts from the Repowered Facility are not expected to have population-level effects for any one bird or bat species.

Threatened and Endangered Species

As described in Exhibit 12 NYS Threatened and Endangered Species, the Applicant generated a Wildlife Site Characterization Report (Appendix 12-A) and completed winter grassland raptor surveys (Appendix 12-B), breeding bird surveys (Appendix 12-C), forest raptor surveys (Appendix 12-D), and bat mist net surveys (Appendix 12-E). Following consultation with NYSDEC, ORES issued a Determination of Occupied Habitat, Incidental Take, and Net Conservation Benefit on December 16, 2024 (Appendix 12-F). ORES found that no occupied habitat for New York State listed threatened or endangered avian bird species occurs within the Facility Site. ORES determined that take of one state-listed bat species would occur and required the preparation of a Net Conservation Benefit Plan (NCBP) for this species in accordance with 16 NYCRR § 1100-2.13(f). The NCBP demonstrates a net positive benefit to the affected species. Pursuant to 16 NYCRR § 1100-1.3(g)(8) and 2.3(f), the Permittee will submit a final NCBP as pre-construction compliance filing (Appendix 12-H). In addition, although no state-listed bat species are known to occur within the Facility Site, the Applicant will comply with limits for tree-clearing activities between November 1 and March 31 and curtailment of turbine operations to minimize potential impacts.

Visual Resources

As described in Exhibit 8 Visual Impacts, the Applicant conducted a visual impact assessment (VIA) that examined a study area encompassing a 5-mile radius of the Repowered Facility. Viewshed mapping was developed to predict potential Repowered Facility visibility throughout the visual study area (VSA) with the maximum proposed wind turbine height of 650 feet.

The VIA determined that less than 4 percent of the VSA may have visibility of one or more of the Repowered Facility's wind turbines above intervening vegetation. To minimize the visual impacts of the Repowered Facility, the Applicant placed new collection lines underground. Based on viewshed analysis and field observation, the Repowered Facility will be fully screened by intervening landform or vegetation from 20 of the 43 identified visually sensitive resources (VSRs). The Repowered Facility may be visible to some degree from 25 identified VSRs. The Applicant consulted with OPRHP, ORES, the Adirondack Park Agency (APA), and the Town of Altona about visual resources of concern within the VSA. The APA and OPRHP provided feedback on the Adirondack Park, including public roads within the Adirondack Park for photo simulation and the unique delineations associated to the Adirondack Forest Preserve. In addition to feedback on mapping and photographs, both ORES and the Town of Altona's engineer provided new VSRs, which were included in the VIA (see Appendix 8-A Visual Impact Assessment). Visibility of the Repowered Facility is not a new visual impact but rather an increase in the visible height of wind turbines. This noticeable height increase may be offset by the reduction in the number of wind turbines from the Existing Facility's 65 smaller wind turbines currently visible to the Repowered Facility's up to 25 taller wind turbines. Given the existing developed context of the Facility Site, the existing character of the landscape would be retained and the wind turbines and new access roads would not substantially affect the existing visual character and quality of the landscape.

The Shadow Flicker Analysis concluded that no non-participating residence receptors would be above the 30-hour per year limit for shadow flicker when mitigation is proposed and only one non-participating residence would be above the 30-hour limit without mitigation (Appendix 8-B). To ensure that no sensitive receptors experience over 30 hours of shadow flicker per year, mitigation options such as blocking or shielding measures can be used at the one non-participating residence through the installation of hedges or barrier walls. Alternatively, wind turbines that would produce shadow flicker on the non-participating residence would be equipped with monitoring equipment that signals turbines to shut down under conditions when the 30-hour annual limit has been reached.

Other Resources

As described in Exhibit 7 Noise and Vibration, no non-participating or participating sound-sensitive receptors were over the maximum noise limits in 16 NYCRR § 1100-6.5(a). The Repowered Facility complies with local noise regulations and will implement noise abatement measures during construction and operation. The Repowered Facility plans to reuse existing infrastructure such as electrical interconnections, the O&M building, and the existing substation. The noise impacts of existing infrastructure would remain unchanged, and no receptors are over the maximum sound levels for non-participating residences from the collector substation. The Repowered Facility equipment meets the requirements of 16 NYCRR § 1100-2.8, to protect neighboring residences and other sensitive receptors. The Applicant will also employ measures to minimize temporary noise during construction of the Repowered Facility, such as by limiting construction activities to normal working hours, utilizing construction equipment fitted with exhaust

systems and mufflers as available, and configuring construction in a manner that keeps loud equipment and activities as far as feasible from noise-sensitive locations.

The Repowered Facility will not have a significant adverse impact on existing utility infrastructure, such as major electric and gas transmission lines, telecommunications resources, or water or sewer services, as discussed in Exhibit 3 Location of Facilities and Surrounding Land Use, Exhibit 16 Effect on Transportation, Exhibit 18 Socioeconomic Effects, Exhibit 20 Effect on Communications, and Exhibit 22 Electric and Magnetic Fields. Exhibit 16 explains that construction will necessarily result in some traffic impacts. However, given the capacity and existing traffic volumes on nearby public roads, construction will not adversely affect local traffic. Most traffic generated during construction will primarily consist of worker passenger vehicles. Oversized vehicles for the main power transformers could result in minor temporary traffic delays; however, the Applicant will coordinate with local officials to avoid impacts to traffic flow. The Applicant anticipates entering into a road use agreement with the Town of Altona to address potential impacts on town and county roads. Exhibit 18 describes consultation with local municipalities and agencies, which determined that construction and operation will place little, if any, demand on municipal services and no impact on municipal expenses. Exhibit 20 describes how the Applicant will continue to transmit operational data to NYPA via the existing interconnections and through the Repowered Facility's use of existing electrical interconnection. Exhibit 20 further describes proposed measures to minimize impacts to any nearby underground cable and telecommunication lines. The Applicant will coordinate with Dig Safely New York prior to commencing any construction activities to identify any additional underground cable or fiber-optic major transmission telecommunications lines. As described in Exhibit 22 Electric or Magnetic Fields, the Repowered Facility will utilize the existing electrical interconnections, without physical modifications or upgrades. Therefore, an Electric or Magnetic Field Test (EMF) Study pursuant to 16 NYCRR § 1100-2.23 is not applicable

2.1.1.2 Facility Environmental Benefits and Contribution to CLCPA Targets

New York State policy and laws require the development of renewable energy projects to significantly increase generating capacity from renewable sources, reduce carbon emissions from the energy sector, and combat climate change. As described in this Application, the Applicant designed the Repowered Facility to avoid and minimize impacts on sensitive resources, while also making a meaningful contribution (maintain the existing 97.5 MW and adding up to 10 MW) to renewable energy generation in New York and furthering well-established policy and legislative goals, including the CLCPA.

The Repowered Facility will aid in advancing the CLCPA goals, including reaching renewable energy generation of 70 percent by 2030 and 100 percent carbon-free electricity by 2040. According to the U.S. Energy Information Administration's New York State carbon dioxide (CO₂) displacement rate, the Repowered Facility is estimated to displace approximately 208,800 metric tons of CO₂ from the state grid. Such reductions in CO₂ and other emissions associated with energy generation will minimize the public health and environmental impacts related to climate

change (see Exhibit 6 Public Health and Safety). The Repowered Facility is also consistent with the State Energy Plan (SEP) as it contributes to the SEP's emphasis on the need for large-scale renewables. The SEP cites that private-sector investments, such as the Applicant's investment in the Repowered Facility, will contribute to building a dynamic and competitive energy market which ultimately reduces energy costs for consumers. The Repowered Facility, as a repowered wind project, helps New York work toward a more diverse, sustainable, modern, and resilient energy system that is not dependent on a single fuel source, aligning with the SEP's vision of modernizing grid infrastructure with resources that are not dependent on fuels sourced and delivered from other parts of the county or the world. The Repowered Facility contributes to establishing a more resilient system that can recover more quickly from significant disruptions to the grid, such as large storms or other events.

2.1.1.3 Community Benefits of the Facility

As described in Exhibit 18 Socioeconomic Effects, the Repowered Facility will continue to provide positive impacts on public welfare through employment opportunities for local residents to benefit from the clean energy transition. During construction, the Repowered Facility is estimated to generate a peak employment of 78 employees, with an average full time equivalent (FTE) Employment of 58 employees. Annual payroll during construction is estimated at \$7.2M. Once operational, the Repowered Facility is estimated to support six FTEs with an annual payroll of \$300,000. The operation and maintenance of the Repowered Facility will not increase the number of full-time employees compared to the Existing Facility.

The Applicant is committed to maintaining economic benefits within the host community through the generation of substantial tax revenues for the local taxing jurisdictions (county, town, and school districts) anticipated to take the form of a Payment in Lieu of Taxes (PILOT) agreement, local and regional spending, and a host community agreement.

The Applicant has collaborated with stakeholders in Clinton County since 2022 through the Applicant's Social Impact Program. The program focuses on increasing access to safe, efficient, and affordable energy and basic services, fostering inclusive economic growth and education, enhancing community resilience, and promoting environmental sustainability. Initiatives include donations to local nonprofits, supporting costly equipment needs for local fire departments and emergency responders, and donations to local school districts. The Applicant is also required to contribute to the Renewable Energy Facility Host Community Benefit Program (PSC 20-E-0249) by paying an annual fee of \$1,000 per MW or \$107,500 for the first 10 years of operation.

2.1.1.4 Local Laws and Ordinances

The Applicant is an established and experienced renewable energy developer and owner operator (see Exhibit 1 General Overview) and prides itself on emphasizing strong stakeholder engagement efforts in the communities where it develops and operates renewable energy facilities, which include the Repowered Facility host communities. The Applicant has endeavored to develop the Repowered Facility in a manner that is respectful and responsive to the local

community. The Applicant has carried out thorough stakeholder engagement (see section 2.2 below), engaging with all Repowered Facility stakeholders, including the host municipality. The Applicant has also endeavored to respond to the primary concerns by amending the Repowered Facility design to respect these local interests. The design meets or, frequently, exceeds all of the minimum setback requirements in the Town's laws except for one. The Applicant will comply with all substantive provisions of the Town of Altona's Wind Energy Facility Laws, with the exception of four local ordinance provisions for which the Applicant has requested a waiver from ORES (see section 24(c) of Exhibit 24 Local Laws and Ordinances). The four provisions are listed below:

- *No WECS (Wind Energy Conversion Systems) Shall be constructed, reconstructed, modified, or operated in the Town of Altona except in a Wind Overlay Zone, pursuant to an application for rezoning and special use.*
- *The Maximum Total Height of any WECS shall be 400 feet.*
- *Unless the property owner submits a written request that no fencing be required, a six foot high fence with a locking portal shall be required to enclose each tower or group of towers. The color and type of fencing for each WECS installation shall be determined on the basis of individual applications as safety needs dictate.*
- *Setbacks for Wind Energy Conversion Systems: One and a half times the Total Height of the WECS from any non-WECS structure or any above-ground utilities.*

2.2 PUBLIC INVOLVEMENT SUMMARY (16 NYCRR § 1100-2.3 (b))

2.2.1 Consultation with Local Agencies

As required by 16 NYCRR § 1100-1.3(a), the Applicant engaged with the Chief Executive Officer of the municipalities in which the Repowered Facility will be located (the Town of Altona and Clinton County) no less than 60 days prior to filing this application. During the pre-application meeting(s), the Applicant provided a description of the Repowered Facility and associated maps illustrating project components and regulatory boundaries; a summary of the Repowered Facility's timeline, including construction, and decommissioning for the Existing Facility; information on potential impacts for which consultation with local agencies will support development of exhibits (such as transportation and visual resources); designated contact information and website; anticipated application date; the Applicant's local partnerships, and information regarding local agency account funding.

On October 9, 2024, the Applicant met with the Town of Altona to discuss a range of issues, including identifying substantive local laws and ordinances relevant to the Repowered Facility. On behalf of the Applicant, Young/Sommer LLC sent letters to the Town of Altona's Supervisor, Joe Snide, listing applicable substantive requirements and local laws with a response to each law indicating efforts made to comply with the laws (see Exhibit 24 Local Laws and Ordinances, Appendix 24-B).

On October 18, 2024, the Applicant sent a letter to Supervisor Joe Snide of the Town Board of the Town of Altona regarding visual impacts consultation as part of compliance with 16 NYCRR § 1100-1.3(a) and § 1100-2.9(b)(4). The request for consultation included a visually sensitive resource list, a preliminary viewshed map, and a map of photo locations. On November 13, 2024, the Applicant provided updated figures to the Town of Altona. Appendix 2-B provides a copy of the request for visual consultation. In response to the outreach, the Town of Altona Engineer provided comments on January 12, 2025, that included updates to the readability and labeling on the accompanying maps, and the addition of the Robinson Tavern (Historical Marker) to the VSR analysis. No requests were made for additional visual simulation locations.

During the October 9, 2024, meeting with Town representatives, the Applicant introduced the Repowered Facility, presented visual simulations and a map of the Repowered Facility's limits of construction disturbance. The Applicant also reviewed topics of potential concern to municipalities, including traffic, visual, sound, and natural resources. The Applicant provided an overview of the information set forth in 16 NYCRR § 1100-1.3(a), including but not limited to, environmental studies and an overview of site restoration and decommissioning activities. Additionally, the Applicant provided the anticipated application date and information regarding the future availability of local agency account funds and ensured that members had access to the Applicant's Project Manager, Mitchell Dangler, via phone, email, and the project website.

2.2.2 Meeting with Community Members

As required by 16 NYCRR § 1100-1.3(b), the Applicant held a meeting with community members no less than 60 days before the submission of this Application. The purpose of the meeting was to educate the public about the Repowered Facility, including the anticipated application date and future availability of local agency account funds.

To provide notice of the October 2024 meeting, the Applicant mailed letters advertising the meeting to those required under 16 NYCRR § 1100-1.6(c), including residents within a 5-mile radius of the Facility Site on September 12, 2024. On September 13, 2024, letters were mailed to elected officials and ORES. Additionally, the Applicant advertised the meeting in advance via its website and publication in the Press Republican on September 18, 2024, and in the Sun Community News on September 21, 2024.

The Applicant conducted a community meeting regarding the Repowered Facility on October 9, 2024, from 5:00 p.m. to 7:00 p.m. at the Rainbow Wedding and Banquet Hall in Altona to educate the public about the Repowered Facility. At the meeting, representatives from the Applicant provided an overview of the Repowered Facility, including information about the Article VIII permitting process and ability to secure funds from the local agency account to defray costs of participating in the permitting process, maps showing Repowered Facility location and infrastructure components, information about environmental studies to date, and information about anticipated community benefits resulting from the Repowered Facility. Additionally, the Applicant provided information related to topics that frequently receive questions, including local

partnerships and information about decommissioning of the Existing Facility and Repowered Facility.

The Applicant's representatives answered questions throughout the community meeting duration. The October community meeting included at least 36 participants. Copies of the meeting boards were posted on the Applicant's website for continued accessibility and availability. Appendix 2-C provides copies of the community meeting boards, postcard, and newspaper advertisements

On November 21, 2024, Foley Hoag LLP, on behalf of the Applicant, filed the affidavits of service and proof of publication of the Applicant's notice of the community meeting in the ORES docket for the Altona Wind Repowering Project.¹

2.2.3 Notice of Intent to File and Notice of Application (16 NYCRR § 1100-1.3(d) and § 1100-1.6(c))

The Applicant filed and served the 60-Day Notice of Intent to File an Application for the Altona Wind Repowering Project in accordance with 16 NYCRR §1100-1.3(d) and § 1100-1.6(c), as evidenced by affidavits of service filed by the Applicant on December 26, 2024 in the ORES docket for this matter.

The Applicant filed and served its 3-day Notice of Intent to File an Application at least three days prior to the filing of this Application in accordance with 16 NYCRR 1100-1.6(c).

2.2.4 Ongoing Public Engagement

The Applicant maintains a project website (<https://www.aes.com/new-york/project/altona-wind>) to serve as a consistent public repository of information related to the Repowered Facility and how to engage in the project process. Contact information is provided so stakeholders can easily reach the project representatives by phone or email for additional project information. Details about the project, including previous ORES determinations, local partnerships, and information advertising community meetings are available on the website. The Applicant will also provide notice on its website about commencement of construction dates, as required in 16 NYCRR § 1100-6.2 Notifications.

The Applicant will continue to engage and interface with local agencies and the public following submittal of the Application. The Applicant will also continue to engage local members of the public through its Social Impact Program.

¹ As a result of the migration of the electronic case file in this matter from the Office of Renewable Energy Siting and Electric Transmission's Permit Application Portal to the Department of Public Service's (DPS's) Document and Matter Management (DMM) system, the case number has been changed from ORES Permit Application No. 23-00091 to ORES DMM Matter No. 23-03029.