ALTONA WIND REPOWERING PROJECT

MATTER NO. 23-03029

16 NYCRR § 1100-2.17 Exhibit 16

Revision 1

Effect on Transportation

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ACRONYM LIST

AADT	average annual daily traffic
CFR	Code of Federal Regulations
FAA	Federal Aviation Administration
I	Interstate
kV	kilovolts
MUTCD	Manual on Uniform Traffic Control Devices
MW	megawatts
NY	New York State Route
NYCRR	New York Codes, Rules and Regulations
NYS	New York State
NYSDOT	New York State Department of Transportation
O&M	operations and maintenance
OS/OW	Oversize/Overweight
Uniform Code	Uniform Fire Prevention and Building Code
US	US Route
WECS	wind energy conversion system

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 § 1100-2.17 Exhibit 16 Effects on Transportation

Exhibit 16 Information	Found in Section
Exhibit 16 shall contain:	
a. A conceptual site plan, drawn at an appropriate scale, depicting all Facility Site driveway and roadway intersections, showing:	16.1
1. Horizontal and vertical geometry, the number of approach lanes, the lane widths, shoulder widths, traffic control devices by approaches, and sight distances; and	16.1
2. For wind facilities, access road locations and widths, including characterizations of road intersection suitability.	16.1
b. A description of the pre-construction characteristics of the public roadways in the vicinity of the Facility, as determined pursuant to the pre-application meeting(s) required pursuant to section 1100- 1.3(a) of this Part, including:	16.2
1. A review of existing data on vehicle traffic, use levels and accidents;	16.2.1
2. A review of transit facilities and routes, including areas of school bus service;	16.2.2
3. An identification of potential approach and departure routes to and from the Facility Site for police, fire, ambulance, and other emergency vehicles; and	16.2.3
4. A review of available load bearing and structural rating information for expected Facility traffic routes (existing culverts to be traversed by construction vehicles shall also be considered in the analyses).	16.2.4
c. An estimate of the trip generation characteristics of the Facility during construction, including:	16.3
1. For each major phase of construction, and for the operation phase, an estimate of the number and frequency of vehicle trips, including an estimation of daily trips (identifying whether trips will occur during day or night) by size, weight, and type of vehicle;	16.3.1
2. For major cut or fill activity (spoil removal or deposition at the Facility Site and affected interconnection areas), a separate estimate of the number and frequency of vehicle trips, including time of day and day of week arrival and departure distribution, and including a delineation of approach and departure routes, by size, weight, and type of vehicle; and	16.3.2
3. An identification of approach and departure routes to and from the Facility Site for construction workers and employees of the Facility.	16.3.3
d. An analysis and evaluation of the traffic and transportation impacts of the Facility, including:	16.4
For wind facilities, a discussion of projected future traffic conditions with and without the facility, the analysis to be conducted separately for the peak construction impacts of the facility and for the typical operations of the completed facility, including in congested urbanized areas a calculation and comparison of the level of service for each representative intersection, giving detail for each turning movement;	16.4.1
2. An evaluation of the adequacy of the road system to accommodate the projected traffic, the analysis to be conducted separately for the peak construction impacts of the Facility (for both wind and solar facilities) and for the typical operations of the completed Facility (analyses to be provided only for operational wind generation) and to include an identification of the extent and duration of traffic interferences during construction of the Facility and any interconnections;	16.4.2
3. An assessment of over-size load deliveries, and the adequacy of roadway systems to accommodate oversize and over-weight vehicles, improvements necessary to accommodate oversize or overweight deliveries, impacts associated with such improvements, and mitigation measures appropriate to minimize such impacts; and	16.4.3

Exhibit 16 Information	Found in Section
4. An identification and evaluation of practicable mitigation measures regarding traffic and transportation impacts, including time restrictions, the use of alternative technologies, the construction of physical roadway improvements, the installation of new traffic control devices, and the repair of local roads or other features due to damage by heavy equipment or construction activities during construction or operation of the Facility.	16.4.4
e. An analysis and evaluation of the impacts of the Facility on airports and airstrips, railroads, buses and any other mass transit systems in the vicinity of the Facility, as determined pursuant to the preapplication meeting(s) held pursuant to section 1100-1.3(a) of this Part. The analysis and evaluation shall include impacts on military training and frequent military operations in the National Airspace System and Special Use Airspace designated by the FAA.	16.5
f. If any construction or alteration is proposed that requires a Notice of Proposed Construction to be submitted to the administrator of the FAA in accordance with 14 Code of Federal Regulations Part 77 (see section 1100-15.1(h)(1)(i) of this Part):	16.6
1. The application shall include a statement that the applicant has:	16.6
i. Received an informal Department of Defense review of the proposed construction or alteration in accordance with 32 Code of Federal Regulations Section 211.7 (see section 1100-15.1(f)(1)(ii) of this Part); or	
ii. Received a formal Department of Defense review of the proposed construction or alteration in accordance with 32 Code of Federal Regulations Section 211.6 (see section 1100-15.1(f)(1)(i) of this Part).	
1. If such construction or alteration of a wind facility is proposed to be located:	16.6
i. Within twelve (12) miles of the nearest point of the nearest runway of a commercial service, cargo service, reliever or general aviation (public use) airport or a military airport with at least one (1) runway more than three thousand two hundred (3,200) feet in actual length; or	
ii. Within six (6) miles of the nearest point of the nearest runway of a commercial service, cargo service, reliever or general aviation (public use) airport or a military airport with its longest runway no more than three thousand two hundred (3,200) feet in actual length; or	
iii. Within three (3) miles of the nearest point of the nearest landing and takeoff area of a commercial service, cargo service, reliever or general aviation (public use) heliport or military heliport:	
(a) The application shall include a statement that the applicant has consulted with the operators of such airports and heliports that are non-military facilities, has provided a detailed map and description of such construction or alteration to such operators, and has requested review of and comment on such construction or alteration by such operators; and	16.6
(b) The application shall include a statement that the applicant has provided a detailed map and description of such construction or alteration to the operators (base commanders) of such airports and heliports that are military facilities.	Not Applicable
3. The application shall include a detailed description of the responses received in such reviews and consultations required in paragraph (1) of this subdivision, including specifically whether and why such operators believe such construction or alteration should be: i. Unrestricted; ii. Subject to site-specific requirements; or iii. Excluded from certain areas.	16.6

16.0 EXHIBIT 16 – EFFECTS ON TRANSPORTATION

SUMMARY OF EXHIBIT

Valcour Altona NewCo, LLC (the Applicant), assessed potential effects on transportation associated with the construction and operation of the Repowered Facility. The Study Area for transportation consists of roadways and associated transportation infrastructure that will be used to access the Facility Site. The Traffic Analysis Report, prepared by WSP USA on behalf of the Applicant, identifies site access points, evaluates existing road conditions, and details anticipated haul routes for the legal load deliveries and equipment and transportation schedules (Appendix 16-B).

The Applicant selected haul routes for construction based on existing public road design, capacity, and weight restrictions. All driveway access points are located on public roadways: along New York State Route (NY) 190 and Duley Road. Internal roadways connect to Fred's Way, which is identified by Clinton County as an abandoned roadway. Most access roads will be 18 feet wide. Driveway intersections will have adequate sight distance and pavement area or will include methods to mitigate sight distance restrictions, such as warning signage and cutting back foliage.

Construction of the Repowered Facility could generate a maximum of 356 trips per day; however, given the capacity and existing traffic volumes on nearby public roads, impacts on traffic are not anticipated to be significant. Construction will be limited to the hours of 7:00 a.m. to 8:00 p.m., Monday through Saturday, and 8:00 am to 8:00 pm on Sunday and national holidays, as required under 16 New York Codes, Rules and Regulations (NYCRR) § 1100-6.4(a). However, construction and delivery activities may occur during extended hours beyond this schedule on an as-needed basis. Additionally, the Applicant will avoid trips during peak travel hours, to the maximum extent possible. The Applicant will coordinate with local transit providers and school districts to ensure that construction does not affect existing routes. No new permanent traffic control devices are anticipated. Oversized vehicles used to transport the wind turbine blades, nacelles, and tower sections will likely cause some traffic delays and temporary stoppages; however, the Applicant will use flaggers and any required pilot or escort vehicles to assist with traffic flow and will enter into a road use agreement with the Town of Altona, as appropriate. The Altona Remote Transport Assessment (Appendix 16-E) identifies a primary turbine component delivery route that originates at the Port of Valleyfield, Quebec. The Applicant's contractor will obtain any necessary ministerial oversize/overweight (OS/OW) vehicle permits to authorize transportation and delivery of these loads.

In accordance with 14 Code of Federal Regulations (CFR) Part 77.9, the Applicant filed a Notice of Proposed Construction or Alteration with the FAA for construction of structures taller than 200 feet above ground level, for all relevant structures on October 16, 2024. IN accordance with 16 NYCRR § 1100-2.17(e), the Applicant initiated consultation with the manager of the Plattsburgh International airport on November 6, 2024, to explain the Article VIII process and the steps the Applicant was taking to coordinate with the FAA.

16.1 FACILITY SITE ACCESS CONCEPTUAL SITE PLAN (16 NYCRR § 1100-2.17(a))

Revised Figure 16-1 and Revised Figure 16-2 in Appendix 16-A show the Repowered Facility driveway and roadway intersections and approach and departure routes (haul routes) for construction workers and other construction vehicles within the Study Area for legal load deliveries and equipment. Exhibit 5 Design Drawings, Appendix 5-A Civil Design Drawings identifies access road locations and widths, including laydown areas and substation/switchyard locations. The Traffic Analysis Report, included as Appendix 16-B, identifies site access points, evaluates existing road conditions, and details anticipated haul routes for the legal load deliveries and equipment and transportation schedules. Variations to the haul route for access to the site for the OS/OW vehicles may be necessary, including the usage of the intersections identified for improvements in the Civil Design Drawings (Appendix 5-A). All such improvements will be verified and/or updated after the final turbine supplier is identified.

Driveway access to the various parcels associated with the Facility Site was determined based on utilizing existing access roads, which consider traffic constraints (e.g., acceptable sight distance, offset from adjacent driveways, and turning radius) and avoid and minimize impacts related to erosion and sedimentation and post-construction stormwater resources.

Driveway access points are located along public roadways, NY 190 and Duley Road. Most access roads will be 18 feet wide. Driveway intersections will have adequate sight distance (or provide mitigation for restricted sight distance). The access road to the operations and maintenance (O&M) building and substation will be 30 feet and 20 feet wide, respectively, to accommodate delivery of large equipment. The dispersion of access points will eliminate concentrations of driveway-related traffic and reduce vehicular movements at individual driveway access locations. The Applicant is proposing to site the primary laydown area on Duley Road to avoid busy arterial roadways to reduce the potential impact on traffic. Revised Appendix 16-C provides a desktop sight distance evaluation with field verification of the driveway access points.

Sight distance is partially impeded at the following existing driveway access point due to the horizontal curvature of the road:

- Roadway 17 – Driveway Access along Duley Road

The Applicant will install temporary traffic warning signs to minimize safety impacts at these locations.

Sight distance is partially impeded at the following four existing driveway access points due to foliage:

- Roadways 2 and 21 (Duley Road) – Driveway Access along Duley Road
- Roadway 3 – Driveway Access along Duley Road

- Roadway 4 – Driveway Access along Duley Road
- Roadway 16 – Driveway Access along NY 190

The primary haul route will be Exit 38 on Interstate (I) 87 to NY 22, then NY 374 to NY 190 northbound until Duley Road, which connects to the laydown area. The secondary haul route will be accessing NY 190 from the north at US Route (US) 11. There is one load-restricted (R-Posted) bridge on NY 190 (a portion technically designated as NY 971L) just south of US 11 and north of the Facility Site. OS/OW vehicles may access the Repowered Facility via I-87, NY 22, NY 374, and NY 190 northbound until Duley Road to avoid the R-Posted bridge on NY 190. There is a height-restricted bridge on NY 374 over I-87 with a permitted 16-foot vertical clearance (New York State GIS Clearinghouse n.d.). Clinton County Route 16 (Devils Den Road) has a restriction noting: "*No Windmill Moved On This Road.*" Culvert locations, some of which were identified through a desktop analysis and field review, that are not classified as large, will be coordinated with NYSDOT and the Town of Altona.

16.2 EXISTING TRANSPORTATION CHARACTERISTICS (16 NYCRR § 1100-2.17(b))

16.2.1 Public Roads (16 NYCRR § 1100-2.17(b)(1) and (3))

Traffic use and accident data for public roadways along haul routes were obtained from NYSDOT; these data are discussed in the Traffic Analysis Report in Appendix 16-B. Table 16.2-1 summarizes the roadway network that the Applicant will use to access the parcels associated with the Facility Site, including pavement condition and average annual daily traffic (AADT). The public roads and their historical peak periods of use are as follows:

- **I-87 –** I-87 is a north-south interstate highway that connects at NY 22 in the Town of Plattsburgh south of the Facility Site. Peak traffic periods are 7:00 a.m. to 8:00 a.m. and 4:00 p.m. to 5:00 p.m.
- **NY 22 –** NY 22 is a main north-south route from I-87 connecting to NY 374 in Plattsburgh south of the Facility Site. Peak traffic periods are 7:00 a.m. to 8:00 a.m. and 4:00 p.m. to 5:00 p.m.
- **NY 190 –** NY 190, also known as Military Turnpike, is a main east-west route from US 11 in Ellenburg Depot connecting to NY 374 south of the Facility Site. Peak traffic periods are 7:00 a.m. to 8:00 a.m. and 3:00 p.m. to 4:00 p.m.
- **NY 374 –** NY 374 is an east-west route from I-87 connecting to NY 190 in the town of Plattsburgh. Peak traffic periods are 7:00 a.m. to 8:00 a.m. and 4:00 p.m. to 5:00 p.m.
- **US 11 –** US 11 is an east-west route from Rouses Point connecting to NY 190 north of the Facility Site. There are no defined peak periods.
- **Duley Road –** Duley Road runs through the Study Area. Traffic volumes are not provided by NYSDOT.

Table 16.2-1 Public Road Descriptions

Road	Description	Pavement Condition	AADT	Peak Traffic Volumes
I-87 (NYSDOT)	• Two to three lanes in each direction • Asphalt-paved • Posted speed limit of 65 mph • 12-foot travel lanes and 10-foot shoulders	Good	17,768	Does not exceed 1,650 vehicles (both directions)
NY 22 (NYSDOT)	• One lane in each direction • Asphalt-paved • Posted speed limit of 45 mph • 12-foot travel lanes and varying shoulder widths	Fair	16,087	Does not exceed 1,300 vehicles (both directions)
NY 190 (NYSDOT)	• One lane in each direction • Asphalt-paved • Posted speed limit of 45 and 55 mph • 10-foot travel lanes and varying shoulder widths	Good	5,442	Does not exceed 550 vehicles (both directions)
NY 374 (NYSDOT)	• One lane in each direction • Asphalt-paved • No posted speed limit • 11.5-foot travel lanes and varying shoulder widths	Good	7,405	Does not exceed 650 vehicles (both directions)
US 11 (NYSDOT)	• One lane in each direction • Asphalt-paved • Posted speed limit of 40 mph • Width is 40 feet with 12-foot travel lanes and 8-foot shoulders	Fair to Good	2,793	Does not exceed 200 vehicles (both directions)
Duley Road (Town of Altona)	• One lane in each direction • Asphalt-paved • Posted speed limit of 35 mph • 10.5-foot travel lanes, no shoulders	Fair to Good	Not published	Not published

Key:
AADT = average annual daily traffic
I = Interstate
mph = miles per hour
NY = New York State Route
NYSDOT = New York State Department of Transportation

NYSDOT reported that 301 accidents occurred in the Study Area along the proposed haul routes during the three-year period from March 2021 through February 2024. Of these 301 accidents, 96 (32 percent) involved collisions between two or more vehicles, 205 accidents (68 percent) only involved one vehicle, 125 accidents (41 percent) involved collisions with deer or other animals, and an additional 80 accidents (27 percent) occurred when a vehicle ran off the road. There were two fatalities from accidents within the Study Area along haul routes. A breakdown of the accident severity of the collisions identified during the three-year period is provided in Table 1 in the Traffic Analysis Report (see Appendix 16-B).

16.2.2 Transit Facility, School District, and Bus Routes (16 NYCRR § 1100-2.17(b)(2))

Clinton County Public Transit provides fixed-route transit services in Clinton County. The Ellenburg route overlaps with the haul route along NY 190. This route provides local and intercity service between the Towns of Ellenburg, Altona, Beekmantown, Schuyler Falls, Plattsburgh, and the City of Plattsburgh (Clinton County Public Transit 2023). Transit service is not provided within the Facility Site; therefore, the construction the Repowered Facility is not expected to have any impacts on public transportation.

There are no active freight rail lines running through the Facility Site.

The Facility Site is in the Northern Adirondack Central School District. Construction vehicles traveling from I-87 through US 22, NY 374, and NY 190 to the Facility Site would pass through the Beekmantown Central School District; however, no project components would be located within this district. School bus routes for these districts change yearly based on population needs. The Applicant has consulted with the superintendent of the North Adirondack Central School District to discuss potential impacts on school district services, and consultation is ongoing (see Appendix 18-A). Turbine deliveries will be coordinated with school districts prior to delivery. The Applicant will make efforts to avoid deliveries using heavy vehicles during morning school bus pick-up and afternoon drop-off hours to avoid disruption of school bus service.

16.2.3 Emergency Service Provider Routes (16 NYCRR § 1100-2.17(b)(3))

The Clinton County Office of Emergency Services operates the region's 911 Dispatch Center, which provides state-of-the-art, countywide radio communications and computer-aided dispatch services to emergency service agencies (Clinton County Emergency Services n.d.). There are nine transporting ambulance services and 35 first response agencies serving Clinton County. Clinton County manages emergency management and services mutual aid and would dispatch volunteer departments from adjoining towns if needed.

The Champlain Valley Physicians Hospital, operated by the University of Vermont Health Network in Plattsburgh, operates the region's 24-hour emergency room and is located approximately 15 miles from the Facility Site. The Altona Fire Department is approximately 5 miles north of the

Facility Site. Police, fire, ambulance, and other emergency vehicles will likely access the Facility Site from the north and south via NY 190.

The Applicant has commenced consultations with emergency service providers to minimize potential impacts to emergency service routes throughout the construction process. The Applicant provided the Emergency Response and Communications Plan (Appendix 6-C) to the Town of Altona and emergency service providers in the area during a meeting on December 19, 2024. The plan includes detailed instructions and guidelines to be followed by site personnel and emergency responders in the event of a major emergency as well as a figure showing emergency routes. Subsequent communications with the Chief of the Altona Volunteer Fire Department on January 23, 2025 did indicated there were no comments on the Emergency Response and Communications Plan. The Applicant will have employees on site trained in responding to emergency situations. Please see Exhibit 6 Public Health, Safety, and Security for further discussion of on-site training and emergency response procedures.

The Applicant designed access roads in consideration of the 2020 Fire Code of New York State Appendix D Fire Apparatus Access Roads. The Applicant will continue to consult and coordinate with the Town of Altona and the Altona Volunteer Fire Department. The Repowered Facility will also comply with the Uniform Fire Prevention and Building Code (Uniform Code) as applicable. The municipal officers for the Town are responsible for reviewing and certifying compliance with the Uniform Code, to the extent the Uniform Code is applicable. The Uniform Code has limited applicability to wind facilities. Wind facilities that are not associated with a building or other structure regulated by the Uniform Code do not meet the definition of a “building” in Article 18 of the New York State Executive Law (§ 372 and § 378).

16.2.4 Load Bearing and Structural Rating Information (16 NYCRR § 1100-2.17(b)(4))

Bridge posting data were acquired from Bridge Data Information by the NYSDOT Posted Bridge Interactive Map (NYSDOT n.d.). There is one load-restricted (R-Posted) bridge on NY 190 (a portion technically designated as NY 971L) just south of US 11 and north of the Facility Site. OS/OW vehicles may access the Repowered Facility via I-87, NY 22, NY 374, and NY 190 northbound until Duley Road to avoid the R-Posted bridge on NY 190. There is a height-restricted bridge on NY 374 over I-87 with a permitted 16-foot vertical clearance. Clinton County Route 16 (Devils Den Road) has a restriction noting: “*No Windmill Moved On This Road.”* Revised Figures 16-1 and 16-2 in Appendix 16-A indicate the locations of additional culverts identified during a desktop review and field identification. The Applicant is consulting with the Town Highway Superintendent regarding the conditions of these and any additional culverts, which are not publicly available for identification, to determine whether any weight restrictions may apply.

16.3 FACILITY STE TRIP GENERATION CHARACTERISTICS (16 NYCRR § 1100-2.17(c))

16.3.1 Number, Type, and Frequency (16 NYCRR § 1100-2.17(c)(1))

The Applicant will use conventional and specialized transportation vehicles to transport construction materials and equipment. The Applicant's contractor will determine the exact scheduling of construction work and required vehicles prior to construction. The number, frequency, and timing of vehicle trips will vary throughout the construction and O&M phases. Table 16.3-1 summarizes the duration of the phase, vehicle type, estimated vehicular weight, vehicles per day, and number of trips proposed per day.

Table 16.3-1 Trip Generation Summary

Project Phase	Vehicle Type	Estimated Gross Vehicular Weight (lbs)	Average Vehicles per Day	Trips per Day
Construction				
Site Preparation	Logging Trucks	40,000–60,000	8–16	Maximum: 32 Average: 16
	Dump/Gravel Trucks	30,000	32–50	Maximum: 100 Average: 64
Facility Construction and Installation	Passenger Vehicles	2,000–10,000	50–60	Maximum: 220 Average: 110
	Beam Trailer	97,000	2–3	Maximum: 6 Average: 4
	13-Axle Trailer	254,000	8–12	Maximum: 24 Average: 16
	13-Axle Double Schnabel or Schnabel Dolly	195,000–250,000	2–3	Maximum: 6 Average: 4
	Dump Trucks	30,000	5–10	Maximum: 40 Average: 20
	Mixer Trucks	70,000	30	Maximum: 60 Average: 60
Operations and Maintenance				
Daily Operations	Utility Vehicles	2,000–10,000	3	Maximum: 6 Average: 4

Source: Appendix 16-B Traffic Analysis Report
Key: lbs = pounds

Most traffic will be generated during construction of the Repowered Facility and will primarily consist of worker passenger vehicles. Repowered Facility construction is anticipated to occur over a 24-month period, and construction-related passenger vehicle and delivery truck trips are anticipated to take place during the day, outside the peak traffic times of 7:00 a.m. to 8:00 a.m. and 3:00 p.m. to 5:00 p.m. Additionally, if project-related traffic does occur during those times, it is not anticipated to affect traffic operations along proposed haul routes because of the relatively low AADT volumes of traffic experienced on those routes.

The Applicant will employ six full-time O&M personnel who will generate minimal vehicular traffic. Three utility-type maintenance vehicles are projected to support site operations. These vehicles are anticipated to generate an average of four trips per day, with a maximum of six trips per day. The O&M work efforts will generally require vehicular trips to the Facility Site outside the AM and PM peak traffic periods.

16.3.2 Cut and Fill Activity (16 NYCRR § 1100-2.17(c)(2))

Reuse of existing access roads access roads, operations and maintenance building, collection substation; and interconnection switchyard will minimize cut and fill associate with the Repowered Facility. The design and construction process attempt to balance the cut and fill so that materials to reuse materials to the maximum extent practicable. Activities related to construction will generate approximately 16,300 cubic yards of fill that will be transported to the Facility Site using 15-cubic-yard-capacity trucks. This will result in an estimated 20 to 40 truck trips per day (10 to 20 entering and 10 to 20 exiting) over the course of 125 workdays. Daily deliveries will be timed to conform with the delivery schedule as required to support the 24-month construction timeline. All fill truck movements will be anticipated to use the haul routes, as indicated on Revised Figure 16-1 in Appendix 16-A. Occasional water delivery trucks (one per week) may be required during construction, but the need will be sporadic, and their delivery times will vary during the day and will generally be outside the AM and PM peak traffic periods.

16.3.3 Project Site Approach and Departure Routes (16 NYCRR § 1100-2.17(c)(3))

The Facility Site is in a semi-rural part of Clinton County, off roadways with no major intersections (i.e., intersections including two or more major arterial roadways). It is not located in or near a congested urbanized area. Revised Figure 16-1 in Appendix 16-A illustrates the parcel locations, proposed driveways, and haul routes. Access to each parcel will vary and will be contingent on the location of the driveway connections to the adjacent roadway system. As noted in Section 16.1, the primary haul route for all construction vehicles will be I-87 to NY 22, then NY 374 to NY 190 northbound. The secondary haul route will be for vehicles to access NY 190 from US 11. Due to an R-posted bridge near the intersection of US 11 and NY 190, all overweight vehicles must access the site via the primary haul route. Most construction vehicles will continue on NY 190 until Duley Road, which connects to the laydown area. Construction workers and employees of the Repowered Facility will access and depart from the Facility Site along the primary or secondary haul routes, connecting from I-87, US 11, and other regional arterials.

Section 16.4.3 discusses oversized deliveries and turning radii evaluated in the Traffic Analysis Report in Appendix 16-B. The route evaluation considers load bearing and structural ratings and turning radii along public roads.

16.4 TRANSPORTATION IMPACT ANALYSIS (16 NYCRR § 1100-2.17(d))

16.4.1 Impacts on Traffic (16 NYCRR § 1100-2.17(d)(1))

The Facility Site is not located in or near a congested urbanized area, as indicated by the traffic volume data and the 2020 United States Census (United States Census Bureau n.d.). Therefore, a calculation and comparison of the level of service for each representative intersection are not included in this Application.

16.4.2 Evaluation of Projected Traffic (16 NYCRR § 1100-2.17(d)(2))

Construction will be limited to 7:00 a.m. to 8:00 p.m. Monday through Saturday, and 8:00 am to 8:00 pm on Sunday and national holidays, as required under 16 NYCRR § 1100-6.4(a). The Applicant anticipates that most traffic during all phases of construction will occur outside the morning and afternoon peak periods (7:00 a.m. to 8:00 a.m. and 3:00 p.m. to 5:00 p.m., respectively). If project-related traffic does occur during those times, it is not anticipated to significantly affect traffic operations along the identified haul routes, given the low volume of traffic on the adjacent roadways during the peak periods. Construction and delivery activities may occur during extended hours beyond this schedule on an as-needed basis. Minor delays and traffic stoppages are anticipated for the oversized deliveries.

Traffic Without the Project

Along with an AADT of 5,442 along NY 190 near the Facility Site, the current hourly directional volume does not exceed 306 vehicles per hour (per direction). Traffic volumes within the last ten years near the Facility Site have remained constant, so current traffic volumes are considered valid for the future conditions with and without construction of the Facility.

Traffic Increases from Project Construction and Project Operation

The maximum capacity for two-lane rural roadways is approximately 1,400 vehicles per hour in each direction. The average and maximum daily traffic volumes anticipated to be generated during construction and operations, as shown in Table 16.3-1, added to the existing volumes, will remain well below this threshold of 1,400 vehicles per hour in each direction.

Therefore, the traffic impacts on the roadway operating level of service during construction and operation are expected to be negligible because (1) trips generated by the construction and operation of the Repowered Facility will be minimal, (2) the existing volume of traffic is low and capacity along the public roadways is available, and (3) the Facility Site is rural (not an urbanized congested location). A detailed intersection or linear roadway analysis was not conducted because of the minimal volumes of traffic anticipated to be generated.

16.4.3 Over-Size Deliveries (16 NYCRR § 1100-2.17(d)(3))

Construction will require at least 230 OS/OW deliveries for turbine blades, nacelles, and tower sections. The Altona Remote Transport Assessment (Appendix 16-E) identifies a primary turbine component delivery route that originates at the Port of Valleyfield, Quebec. The route will cross

into the U.S. and continue along I-87 to US-11 S, then along NY-22 S, Gilbert Road, Woods Falls Road, Devils Den Road, and to NY190 E before accessing the laydown area along Duley Road. The remote transport assessment also identifies five locations and includes detailed drawings where potential intersection improvements would be needed. Appendix 16-E also identifies a secondary route and tertiary route from the Port of Ogdensburg, New York to the Facility Site. The secondary route would utilize NY-37 E, NY-122 E, US-11 N, Forest, Road, and NY-190 E to Duley Road and would require improvements at seven intersections. The tertiary route would use Ford Street, NY-37 E, NY-131 W, NY-37 E, NY-122 E, US-11 N, Forest Road, and Military Turnpike to Duley Road and would require improvements at ten intersections. Since the actual delivery vehicles will be determined in consultation with the supplier, the specific impacts associated with specific vehicle types are not known. Movement of OS/OW deliveries will likely result in temporary and localized delays in traffic and lane closures.

The Applicant identified localized routes for the delivery of turbine components based on the traffic analysis report (Appendix 16-B) and the anticipated final design of the Repowered Facility. Localized routes for delivery of turbine components are depicted on Sheet G-010 and Figures 16-1 and 16-2. Based on the assumed vehicles that will be used for deliveries, roadway improvements at three intersections not tied directly to Repowered Facility access roads or other infrastructure are anticipated to accommodate the radius of the OS/OW delivery vehicles; those improvements are detailed in Exhibit 5 Design Drawings, Appendix 5-A Civil Design Drawings. For any improvements needed, the Applicant will enter into a road use agreement with the appropriate jurisdiction, as necessary, to address improvements and measures to avoid or minimize impacts on the roadway and the potential for vehicle crashes. The Applicant will submit a Traffic Control Plan in accordance with 16 NYCRR § 1100-10.2(e)(8) that will include the specific measures to ensure safety and minimize potential delays to local traffic during construction. Temporary road improvements and mitigation measures will be defined in the Applicant's Traffic Control Plan and pre-construction compliance filing drawings.

The Applicant's contractor will obtain any necessary ministerial OS/OW vehicle permits to authorize transportation and delivery of OS/OW loads at an appropriate time closer to the start of construction. These permits require provision of delivery dates, load dimensions, and other details, which are not known at this time. Once those details are finalized, the OS/OW permit applications will be submitted to NYSDOT and/or other appropriate jurisdictions, if required.

16.4.4 Transportation Mitigation (16 NYCRR § 1100-2.17(d)(4))

The Applicant anticipates that most Repowered Facility-related traffic during all phases of construction will occur outside the AM and PM peak periods to minimize impacts on traffic. No additional mitigation measures for traffic capacity impacts are proposed at this time because of the suitable traffic conditions of proposed haul routes. No new permanent traffic control devices are anticipated.

The Applicant will address impacts on roadways from transportation of heavy equipment in accordance with approved Traffic Control Plan, which will be submitted as a pre-construction

compliance filing, and any Road Use Agreements with the Town of Altona. The Traffic Control Plan will comply with the applicable, substantive requirements of the Town of Altona Wind Energy Facilities Law § 1225(A) by including measures to:

- Minimize traffic impacts from construction and delivery vehicles
- Minimize traffic related to the wind energy conversion system (WECS) during times of school bus activity
- Minimize wear and tear on local roads
- Minimize impacts on local business operations

The Traffic Control Plan may also limit WECS-related traffic to specified routes, determined in consultation with the Town of Altona, and plans for disseminating traffic route information to the public. Final transportation routing will be designed in consultation with NYSDOT and the Town of Altona to avoid or minimize, to the extent practical, safety issues associated with the use of the approved haul routes. Any needed improvements based on Road Use Agreements with the Town of Altona, discussed in Sections 16.4.3, will be made at the Applicant's expense prior to the arrival of OS/OW vehicles. The Applicant will repair any damage to the approved haul routes sustained during the construction of the Repowered Facility to a condition equal to or better than the roadways' condition prior to construction, consistent with the Traffic Control Plan and Road Use Agreements. The Applicant will consult with NYSDOT and local jurisdictions to ensure that the Traffic Control Plan and the Road Use Agreements include measures that will avoid or minimize impacts on the roadway, and the potential for vehicle crashes. Mitigation measures may include the following:

- Facilitate traffic by using flaggers, signage, and barricades to guide vehicles through or around construction zones. The Applicant will follow recommended considerations of the New York State Manual on Uniform Traffic Control Devices (MUTCD) latest edition, including proper signage.
- Schedule construction activities and oversize deliveries during off-peak hours to the extent feasible, including night or weekend work following approval.
- Enforce speed limits of construction vehicles on all roads, including unpaved access roads.
- Comply with any conditions imposed in connection with encroachment permits issued by local agencies.
- Document road and pavement conditions with photographs prior to installation and after repair and removal of temporary improvements.
- Provide MUTCD-compliant signage to warn of restricted sight distance due to topography or vegetation at access roadways.
- Coordinate with NYSDOT and the Town of Altona to determine the condition of small culverts along the haul routes.

- Notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of the location, date, and time of scheduled oversize deliveries.
- Coordinate with Clinton County Public Transit and the Northern Adirondack Central School District during construction to ensure that any temporary increases in traffic or oversized deliveries do not affect transit or school bus routes.

16.5 Evaluation of Rail and Transit Impacts (16 NYCRR § 1100-2.17(e))

Daily traffic generated during construction and operations is anticipated to have negligible effects on rail, the Clinton County Public Transit fixed-route transit service, or school bus operations. As discussed in Section 16.4, project-related traffic is not anticipated to significantly affect traffic operations along the identified haul routes. As the Repowered Facility proceeds to construction, the Applicant will provide appropriate notices to local transit operators and school districts to ensure continued coordination.

Table 16.5-1 lists all airports within 12 miles of the Facility Site. As discussed in Section 16.6, the impact of the Repowered Facility on military and civilian air space, including military training and operations and other airport/heliport operations, are addressed by the Federal Aviation Administration (FAA)'s review of the Applicant's Notice of Proposed Construction or Alteration and discussions with the U.S. Department of Defense's Siting Clearinghouse. Neither the construction nor the operation of the Repowered Facility is anticipated to affect aviation.

Table 16.5-1 Airport within 12 Miles of the Facility Site

Facility	Type	Runway Length (feet)	Distance from Facility (miles)
Vasile Field	Private Airport	1,850	3.47
Mountain View Airpark	Private Airport	1,800	8.97
Northway	Private Airport	2,100	8.71
Plattsburgh International	Public Use Airport	11,759	11.13

16.6 Federal Aviation Administration Notification (16 NYCRR § 1100-2.17(f))

The nearest aviation facilities are Plattsburgh International Airport, a public airport located in the Town of Plattsburgh, approximately 11 miles south of the Facility Site, and the Northern Liberties Airport-VT46, located 40 miles east of the Facility Site. The FAA must be notified of any proposed construction exceeding 200 feet aboveground or construction within 20,000 feet of a public-use airport and as outlined in 14 Code of Federal Regulations (CFR) Part 77.9.

Since the Repowered Facility will involve the construction of structures taller than 200 feet above ground level, the Applicant filed a Notice of Proposed Construction or Alteration with the FAA for turbines on October 16, 2024 and a marking and lighting request for ADLS on February 4, 2025. The FAA can issue two types of determinations, one that identifies a potential hazard and another

that identifies no hazard. If the proposed structure is over 499 feet, or if a potential hazard to air navigation is identified based on the structure's location and/or height, then a Notice of Presumed Hazard is issued that must be publicly circulated prior to a final FAA determination. A Determination of No Hazard will be issued if the FAA determines that the proposed structure will not pose a risk to aviation, including a review of potential aviation impacts on local airports. Although the FAA has not yet issued determinations for these filings, the Applicant will provide FAA Determinations of No Hazard upon receipt as part of its Compliance Filings. No vertical construction of the Repowered Facility's wind turbines or meteorological towers will occur until the FAA provides the associated Determinations of No Hazard to Air Navigation.

As part of the FAA submission, the Department of Defense Siting Clearinghouse was also notified and provided data regarding the Repowered Facility to identify and mitigate any potential adverse impacts and to minimize risks to national security while allowing the Applicant to proceed with development. At this time, a review of the proposed construction is pending with the Department of Defense pursuant to 32 CFR [211.6/211.7].

16 NYCRR Section 1100-2.17(f)(2) requires that applicants consult with the operators of commercial service, cargo service, public use, or military airports if one or more of the following criteria are met:

1. The proposed facility is within 12 miles of the nearest runway, and at least one runway exceeds 3,200 feet in length;
2. The proposed facility is within 6 miles of the nearest runway, and the longest runway is no more than 3,200 feet; or
3. The proposed facility is within 3 miles of landing and takeoff areas of a heliport.

As shown in Table 16.5-1, the Plattsburgh International Airport is the only facility to meet the criteria for consultation. The Applicant sent a letter to the manager of the Plattsburgh International airport on November 6, 2024, to explain the Article VIII process and the steps the Applicant was taking to coordinate with the FAA (see Appendix 16-D, Airport Consultation). The letter included a detailed map and description of the Repowered Facility and requested review of, and comment on, the Repowered Facility by the operators. Consultation is ongoing. There are no heliports or military airports within criteria outlined above for consultation.

16.7 UNIFORM STANDARDS AND CONDITIONS

Table 16.7-1 identifies the applicable Uniform Standards and Conditions for this exhibit.

Table 16.7-1 Applicable Uniform Standards and Conditions for Communications

Citation	Uniform Standards and Conditions
1100-6.1(d)(2)	Other Permits and Approvals. Prior to the permittee's commencement of construction, the permittee shall be responsible for obtaining all necessary federal and federally-delegated permits and any other approvals that may be required for the facility and which the Office is not empowered to provide or has expressly authorized. In addition, the Office expressly authorizes: (2) The NYSDOT to administer permits associated with oversize/overweight vehicles and deliveries, highway work permits, and associated use and occupancy approvals as needed to construct and operate the facility;
1100-6.3(c)	Traffic Coordination. The permittee shall coordinate with State, county, and local highway agencies to respond to and apply applicable traffic control measures to any locations that may experience any traffic flow or capacity issues.
1100-6.4(a)	Construction Hours. Construction and routine maintenance activities on the facility shall be limited to 7 a.m. to 8 p.m. Monday through Saturday and 8 a.m. to 8 p.m. on Sunday and national holidays, with the exception of construction and delivery activities, which may occur during extended hours beyond this schedule on an as-needed basis. (1) Construction work hour limits apply to facility construction, maintenance, and to construction- related activities, including maintenance and repairs of construction equipment at outdoor locations, large vehicles idling for extended periods at roadside locations, and related disturbances. This condition shall not apply to vehicles used for transporting construction or maintenance workers, small equipment, and tools used at the facility site for construction or maintenance activities. (2) If, due to safety or continuous operation requirements, construction activities are required to occur beyond the allowable work hours, the permittee shall notify the NYSDPS, the Office, affected landowners and the municipalities. Such notice shall be given at least twenty-four (24) hours in advance, unless such construction activities are required to address emergency situations threatening personal injury, property, or severe adverse environmental impact that arise less than twenty-four (24) hours in advance. In such cases, as much advance notice as is practical shall be provided.

Citation	Uniform Standards and Conditions
1100-10.2(e)(8)	A Traffic Control Plan shall be in effect during facility construction, to ensure safety and minimize potential delays to local traffic during construction, which shall describe, at a minimum, the following: (i) Maps and plans showing final haul routes developed in consultation with the host municipalities and NYS, County and municipal highway officials in coordination with the turbine manufacturer. Final haul routes shall be accurately depicted in drawings submitted with the Traffic Control Plan. (ii) Copies of all necessary transportation permits from the affected State, County, and municipal agencies for such equipment and/or materials on such route. Such permits shall include but not be limited to: Highway Work Permits to work within the ROW, permits to exceed posted weight limits, Highway Utility Permits to construct facilities within ROW, Traffic Signal Permits to work within ROW, Special Haul Permits for oversize/overweight vehicles, and Divisible Load overweight Permits. (iii) Copies of all necessary agreements with utility companies for raising or relocating overhead wires where necessary to accommodate the oversize/overweight delivery vehicles, if applicable. (iv) A copy of all road use and restoration agreements, if any, between the permittee and landowners, municipalities, or other entities, regarding repair of local roads damaged by heavy equipment, construction or maintenance activities during construction and operation of the facility.

16.8 REFERENCES

Clinton County Emergency Services. Not dated. https://www.clintoncountyny.gov/emergency Accessed September 20, 2024.

Clinton County Public Transit. 2023. https://transit.clintoncountyny.gov/. Accessed September 20, 2024.

New York State Department of Transportation (NYSDOT). Not dated. Posted Bridges Interactive Map. https://www.dot.ny.gov/postedbridges. Accessed September 20, 2024.

New York State GIS Clearinghouse. Not dated. NYSDOT Structures. https://data.gis.ny.gov/maps/9e038774ef034c7cae5374f3e23f7a67/about. Accessed October 23, 2024.

United States Census Bureau. Not dated. TIGERweb. https://tigerweb.geo.census.gov/tigerweb/. Accessed February 17, 2025.