

Appendix 23-A

Revised Decommissioning Plan for the Altona Wind Project



A DECOMMISSIONING PLAN FOR

Altona Wind Repower Project

Clinton County, New York

JULY 16, 2025

PREPARED FOR:

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Decommissioning Plan

Altona Wind Repower Project

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Attachment A: Decommissioning Cost Estimate

1.0 Introduction / Project Description

The Altona Wind Repower Project (“Facility”) is a wind power generation project proposed by Valcour Altona NewCo, LLC (“Applicant”) in Clinton County, New York. The Facility layout will consist of up to 25 wind turbines and supporting infrastructure, which will include access roads, collection lines, meteorological and aircraft detection lighting system towers, laydown yards, as well as other Facility components. The proposed Facility will incorporate several components of the existing project including the existing operations and maintenance building, collection substation, associated point-of-interconnection (POI) as well as a subset of existing access road and collection line routes.

This Decommissioning Plan (“Plan”) has been prepared in accordance with the 16 New York Codes, Rules and Regulations (NYCRR) 1100-2.24(a). The purpose of the Plan is to describe the means and methods that can be used to remove project facilities and reclaim, restore, and return the land altered during the construction and operation of the wind project to its predevelopment condition to the extent feasible. The Plan identifies components that may be removed and the areas that may be restored once the Facility has surpassed the useful lifespan of the turbines and facilities.

The useful life of commercial size turbines is generally considered to be thirty (30) years. At that time, the project will either be decommissioned or repowered with newer technology. This decommissioning plan reflects the full decommissioning of the Facility, including removal of all infrastructure and equipment and reclamation of the site to match previous land use, unless otherwise specified.

2.0 Proposed Future Land Use

Prior to the development of the Facility, the land use of the project area was primarily agricultural production. After the developed areas of the Facilities are decommissioned, they will be tilled to a farmable condition to match-pre-construction conditions. Please refer to Section 3.2 for a detailed description of reclamation activities.

3.0 Engineering Techniques

Decommissioning of the wind farm includes multiple phases and activities such as:

- Application of necessary sediment and erosion controls during and following decommissioning activities.
- Public road modifications (if required) and access road improvements to accommodate heavy equipment traffic during decommissioning.
- Removal of aboveground components (turbines, transformers, overhead collection lines, MET towers and ADLS tower, and substation) for either resale or scrap.
- Removal of turbine foundations to a depth of four (4) feet below grade.
- Removal of other underground components (junction boxes, transformer and substation foundations) to a depth of four (4) feet below grade.
- Removal of access roads (unless the landowners request the roads to remain) and decompaction.

- Reclamation, re-grading, and restoration of disturbed areas including topsoil reapplication and decompaction of soils.
- Repair and/or restoration of public roads and culverts to pre-decommissioning conditions, as required.

During decommissioning, the landowners will be consulted to identify the extent and type of work to be completed. Some Facility infrastructure, such as the access roads, may be left in place at the landowners' requests. Underground utility lines, if deeper than four (4) feet below ground surface elevation, may be left in place to minimize land disturbance and associated impacts to future land use.

Decommissioning will include the removal and transportation of all turbine components from the Facility site. Decommissioning will also include the removal of electrical components, foundations, and any other associated facilities in the manner described in the Plan, unless otherwise agreed upon by Applicant and the applicable landowner(s). All dismantling, removal, recycling, and disposal of materials generated during decommissioning will comply with rules, regulations, and prevailing Federal, State, and local laws at the time decommissioning is initiated and will use approved local or regional disposal or recycling sites as available. Recyclable materials will be recycled to the furthest extent practicable. Non-recyclable materials will be disposed of in accordance with State and Federal law.

3.1 Decommissioning of Project Components

3.1.1 Public Road Improvement and Access Road Modifications and Removal

As the cost estimate is based on scrapping and recycling turbine components where possible, sections of public roads that have insufficient strength to accommodate the construction traffic necessary for decommissioning will need to be improved prior to the start of hauling operations. Intersection turning radius modifications are not anticipated since turbine components will be cut to fit on standard semitrailer trucks. The roads subjected to decommissioning traffic will be restored to a condition equal to or better than the condition of the road prior to decommissioning activities. Aggregate removed from the Facility access roads is a potential source for the public road restoration material. A pre-decommissioning road survey, similar to a pre-construction survey, may be prepared so that road conditions pre- and post-decommissioning can be accurately assessed.

3.1.2 Crane Path and Crane Pad Preparation and Removal

This cost estimate is based on the felling of all turbines, which eliminates the need for large industrial cranes and the associated crane paths and crane pads.

3.1.3 Wind Turbine Felling

This cost estimate assumes that the turbines not being resold will be brought to the ground using the technique of "felling." Once on the ground, the turbines will be disassembled and processed for recycling. The felling technique has been used on numerous wind decommissioning projects and has several advantages over disassembly using large crawler cranes. Felling of a turbine eliminates the use of crane paths and crane pads that are otherwise necessary to disassemble the components of a turbine. In addition to avoiding costs associated with preparing crane paths and pads, this method will reduce the total disturbed area that needs to be reclaimed and restored during the decommissioning process. The elimination of the use of large cranes also reduces the number of trucks delivering and removing

equipment and reduces the time required for decommissioning. Felling consists of disconnecting electrical connections and draining oil, hydraulic fluid, and any other liquids from the turbine. A long cable is attached to the nacelle and to a heavy piece of equipment, such as a bulldozer, positioned on the access road. Wedge shaped areas are then cut out of the tower steel using cutting torches to create a hinge that will direct the turbine to fall on the access road when pulled by the dozer.

3.1.4 Turbine Foundation Removal and Restoration

The turbine foundations are constructed from concrete and rebar. Little topsoil stripping will be required since the portion of the foundation less than four (4) feet deep is within the gravel ring around each turbine. The foundation will first be exposed using backhoes or other earth moving equipment. The pedestal (upper part of the turbine foundation) will then be removed to a depth of at least four (4) feet below grade using hydraulic vibratory hammers to break up the concrete. The rebar can be cut with torches or cutoff saws. The concrete will be broken into pieces sized for transport. The foundation debris will be hauled off site to be recycled or disposed of, depending on market prices for aggregate at the time of decommissioning. The rebar will be recycled.

Following removal of the turbine foundation, the resulting void will be backfilled with native subsoils and compacted to at least 90% of the fill material's standard Proctor density. Topsoil will be reapplied to the site and graded to match surrounding grade to preserve existing drainage patterns. The topsoil and subsoil will be decompacted to a minimum depth of 18 inches and revegetated to match pre-construction conditions.

3.1.5 Meteorological (MET) and Airline Detection Lighting System (ADLS) Towers

Following disconnection of electrical components, towers will be gradually lowered to the ground for disassembly. The steel structures will be cut into pieces sized to meet recycling requirements so the scrap value may be maximized. The components will then be loaded on tractor-trailers and transported to a metal recycling facility.

The concrete pads, along with any anchoring components, will be excavated to a depth of four (4) feet. Concrete will be broken into transportable pieces and hauled off site. Following removal of the foundations, subsoil will be decompacted to a minimum depth of 18 inches. Topsoil will be reapplied to match the surrounding grade.

3.1.6 Access Roads

Removal of access roads will entail removal of the road base aggregate and any other materials used for constructing the roads. During removal, the topsoil adjacent to both sides of the roads will be stripped and stockpiled in a windrow paralleling the road. The road base materials will then be removed by bulldozers, wheeled loaders, or backhoes and hauled off site in dump trucks to be recycled or disposed of at an off-site facility. On-site processing may allow much of the aggregate to be re-used to improve public roads. The aggregate base can often be used by local landowners for driveway or clean fill. Another option is to use the aggregate base as "daily cover" at a landfill, where it is usually accepted without cost. If geotextile fabric was utilized under the aggregate base, it will be removed and disposed of in a landfill off site. The access road removal will proceed from the turbine area to the public roads to limit tracking and provide stable access during removal. Following removal, topsoil will be reapplied and graded to blend with surrounding contours to promote pre-construction drainage patterns. Topsoil to

cover the access roads, turbine rings, and met tower rings will be acquired from the areas where it was stockpiled (or wasted) during the original construction. Since topsoil stayed with each landowner during the construction of the wind farm, there will be adequate topsoil to restore each area to its pre-construction condition. The soil and topsoil will then be decompacted to a minimum depth of 18 inches and restored to pre-construction tillable conditions or revegetated.

3.1.7 Underground Electrical Collection Lines

The electrical cables and fiber optic conduits contain no material known to be harmful to the environment and will be left in place, non-functional. Any cables at a depth of less than four (4) feet, such as cables entering and exiting the turbine foundations, junction boxes, or substation components, will be removed. Following any necessary removal, the area affected will be restored by reapplication of topsoil to match the surrounding grade and preserve existing drainage patterns. The topsoil and subsoil will be decompacted to a minimum depth of 18 inches and tilled to farmable conditions.

3.1.8 Overhead Electrical Collection Lines

The overhead collection lines connect the project substation. All poles, conductors, switches, and lines associated with the overhead electrical will be removed and hauled off site to a recycling facility or disposal site. Underground infrastructure such as pole foundations will be removed down to four (4) feet below grade. Pole foundation holes will be filled with a suitable clean compactable material. Topsoil will be applied and the areas will be tilled to a farmable condition or revegetated to pre-construction conditions, depending on the pre-construction land use of that area.

3.1.9 Substation

Decommissioning of the project substation will be performed with the rest of the Facility. All steel, conductors, switches, transformers, and other components of the substation will be disassembled and taken off site to be recycled or reused. Foundations and underground components will be removed to a depth of four (4) feet. The rock base will be removed using bulldozers and backhoes or front loaders. The material will be hauled from the site using dump trucks to be recycled or disposed at an off-site facility. Additionally, any permanent stormwater treatment facilities (e.g., infiltration ponds and engineered drainage swales) will be removed. Topsoil will be reapplied to match surrounding grade to preserve existing drainage patterns. Topsoil and subsoil will be decompacted to a minimum depth of 18 inches and the site will be revegetated to match pre-construction conditions.

3.1.10 Operations and Maintenance Building

For the purposes of this decommissioning cost estimate, it is assumed that the O&M Building will be resold. As a result, no decommissioning or reclamation costs have been included in the estimate.

3.2 Reclamation

In addition to the reclamation activities described above for each decommissioning activity, all unexcavated areas compacted by equipment and activity during the decommissioning will be decompacted to a depth of 18 inches or to a depth as needed to ensure proper density of topsoil consistent and compatible with the surrounding area and associated land use. All materials and debris

associated with the Facility decommissioning will be removed and properly recycled or disposed of at off-site facilities.

As necessary, the topsoil will be stripped and isolated prior to removal of structures and facilities for reapplication to promote future land use activities. Preservation of topsoil will be key for re-establishing vegetation at the site. The topsoil will be reapplied following backfill, as necessary, and graded to blend with adjacent contours to maintain pre-construction drainage patterns. Decompaction of the soil and topsoil will be applied to a minimum depth of 18 inches.

Areas formerly used for agriculture shall be re-tilled to a farmable condition. In areas not to be used for crops, the topsoil will then be revegetated using seed mixes approved by the local Farm Service Agency, Soil and Water Conservation District, Natural Resource Conservation Service, or other state agency. The selected seed mix must be suitable for the site's annual precipitation and elevation. Temporary erosion protection such as nurse crop (annual grass to aid in establishment of permanent species), mulch, hydromulch, or erosion control blanket will be applied in accordance with the requirements of the project Stormwater Pollution Prevention Plan (SWPPP) until permanent vegetation has been established.

4.0 Best Management Practices (BMPs)

During decommissioning, erosion and sediment control BMPs will be implemented to minimize potential for erosion of site soils and sedimentation of surface waters and waters of the state. Because decommissioning will entail disturbance of more than one acre of soil, the Applicant will prepare a SWPPP and obtain coverage under the state-specific National Pollutant Discharge Elimination System (NPDES) permit prior to initiating soil disturbing activities. Potential BMPs to be implemented during decommissioning activities are described below and will be subject to refinement in the SWPPP. The decommissioning team will review the permitting requirements at the time of decommissioning and obtain any other necessary permits, which may include a US Army Corps of Engineers Section 404 Permit to Discharge Dredged or Fill Material.

4.1 Erosion Control

Erosion control measures will be refined based on the standard of practice current at the time the SWPPP is developed for decommissioning. All disturbed areas without permanent impermeable or gravel surfaces, or planned for use as crop land, will be vegetated for final stabilization. All slopes steeper than 4:1 should be protected with erosion control blankets. Restoration should include seed application prior to application of the blanket. All slopes 4:1 or flatter should be restored with seed and mulch, which will be disc anchored.

4.2 Sediment Control

Sediment controls, such as silt fence, fiber logs, dewatering practices, construction entrances, and sedimentation traps and/or basins will be implemented during construction to prevent the transport of sediment off-site during decommissioning activities. Street sweeping/scraping will also be implemented to mitigate potential tracking of sediment onto public roadways.

4.3 Controlling Stormwater Flowing Onto and Through the Project

Given the low gradient of the slopes in the project area, controlling stormwater flow that enters the project area will likely require minimal effort during decommissioning activities. Only newly disturbed areas may require new, temporary stormwater control.

4.4 Permitting

All decommissioning and reclamation activities will comply with Federal and State permit requirements. Decommissioning activities that will disturb more than one acre of soil will require coverage under the New York State Pollutant Discharge Elimination System (SPDES) permit for construction stormwater. The permits will be applied for and received prior to decommissioning construction activities commencing. A SWPPP will be developed prior to filing for construction stormwater permit coverage.

Wetlands and waters permits will be obtained from the USACE or New York State Office of Renewable Energy Siting & Electric Transmission (ORES). A Spill Prevention, Control, and Countermeasures (SPCC) Plan for decommissioning will likely also be required for decommissioning work.

4.5 Health and Safety Standards

Work will be conducted in strict accordance with the Applicant's health and safety plan. The construction contractor hired to perform the decommissioning will also be required to prepare a site-specific health and safety plan. All site workers, including subcontractors, will be required to read, understand, and abide by the Plans. A site safety office will be designated by the construction contractor to ensure compliance. This official will have stop-work authority over all activities on the site should unsafe conditions or lapses in the safety plan be observed.

5.0 Timeline

Decommissioning of the Facility will be initiated when the Facility has surpassed the useful lifespan of the turbines and facilities.

It is anticipated that the decommissioning activities for the Facility can be completed in an 18-month period. Site mobilization will take approximately three (3) months to account for project planning and permitting. Following site mobilization, it will take approximately three (3) months to install preliminary erosion and sediment controls, complete civil reconstruction work, and otherwise facilitate the disassembly of the wind turbines and the removal of wind turbine components, including foundations and cables within four (4) feet of the surface. Following the completion of the civil work, it will take approximately six (6) months to disassemble the wind turbines, MET and ADLS towers, and remove access roads. Concurrent with the removal of the turbine and civil infrastructure components, the substation and O&M facility will be decommissioned over a period of approximately nine (9) months. In total, the decommissioning activities will be performed over a period of approximately twelve (12) months, with restoration being initiated as soon as possible when work is completed in each area. It is estimate that an additional three (3) months will be needed to achieve final vegetative stabilization across the full site.

This estimated timeline, and by extension, the estimate costs presented in this Plan, are tied to

assumptions about the amount of equipment mobilized, the crew sizes, weather and climate conditions, and the productivity of the equipment and crews.

6.0 Decommissioning Costs

The cost estimate for decommissioning and reclamation of the Facility was prepared in current dollars, with the salvage value of equipment or materials calculated separately. The estimate includes:

- (i) An analysis of the physical activities necessary to implement the approved reclamation plan, with physical construction and demolition costs based on applicable Department of Transportation unit bid prices from surrounding states and RS Means material and labor cost indices;
- (ii) The level of effort or number of crews required to perform each of the activities; and
- (iii) An amount to cover contingencies above the calculated cost.

The following information was used to develop the cost estimate:

1. Project quantities for the Facility are based on 30% civil plans prepared by Kimley-Horn and dated 10/01/2024 and additional information provided by Valcour Altona NewCo, LLC on November 4, 2024.
2. A project of this size and complexity requires a full-time project manager with full-time support staff.
3. Common labor will be used for the majority of tasks, supplemented by electricians, steel workers, and equipment operators where labor rules may require. The labor rates reflect union labor rates.
4. Turbines that are not resold will be assumed to have all applicable components recycled as scrap. The estimate uses a current structural scrap price of \$300 per ton, in the East Coast, based on prices posted on scrapmonster.com, (11/27/2024). The posted prices are three months old. The posted spot prices used in the cost estimate were discounted by twenty-five percent (25%) to reflect the difficulty of realizing spot prices from local recyclers.
5. Electrical transformers have significant value due to aluminum or copper used in the windings and the steel used in other parts of the transformer. Newer transformers can be resold. Older transformers are recycled as scrap. Few companies accept used transformers for resale or recycling, so finding pricing is difficult. For this estimate, we used pricing posted on scrapmonster.com of \$0.44 per pound for used copper transformer scrap. We assumed the posted price is similar to the price offered by Earth Waste & Metal located in Morrisonville, NY, which was identified as the regional transformer recycling location.
6. Spot prices for insulated copper wire (85% recovery) are \$1.61 per pound, electrical motors/generators are \$0.45 per pound, and E.C. aluminum wire is \$1.12 per pound. The posted spot prices used in the cost estimate were discounted by twenty-five percent (25%) to reflect the difficulty of realizing spot prices from local recyclers.
7. The NYCRR requires a fifteen (15%) contingency be added to the cost estimate for calculating the bond amount.

The total estimated cost of the decommissioning of the Altona Wind Repower Project is approximately \$6,973,656 (\$278,946 per turbine), including crop loss. Estimated salvage/scrap value of the turbines, transformers, and other materials is approximately \$2,917,290. The net decommissioning costs after accounting for resale and salvage values is approximately \$4,056,366, or \$162,255 per turbine.



Attachment A

Decommissioning Cost Estimate

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