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September 18, 2026

VIA EMAIL

Hon. Michelle L. Phillips (secretary@dps.ny.gov)
Secretary to the Commission
New York State Public Service Commission

**Re: Case No. 17-F-0282 – Alle-Catt Wind Energy LLC;
Comments on revised PNIA**

Dear Secretary Phillips:

On behalf of the Coalition of Concerned Citizens, please accept the attached replacement for technical comments prepared by Rand Acoustics, filed two days ago on September 16. Previously, a draft version was submitted by mistake. For today's submission Rand Acoustics has made typographic corrections, has modified substantive discussions of low frequency noise and the effects of icing on wind turbine blades, and has added a brief discussion of low-frequency impacts showing that at least four receptors will be exposed to noise levels exceeding 65 dBZ at the 16 Hz octave band.

Today's replacement submission does not affect my September 16 covering comments.

In today's replacement submission Rand Acoustics notes that deficiencies found in the revised PNIA are also found in previous versions, as discussed in Rand Acoustics' December 17, 2024 comments. *See* DMM No. 662. Those comments were never addressed. *See* DMM No. 665 (filed December 19 2024). The 2024 Rand Acoustics comments note that:

- ISO 9613-2 reports an uncertainty of +/- 3 dB between 100 and 1000 meters from the source of noise, but Hankard (then and now) fails to apply this uncertainty. (p. 2)
- Winter icing buildup on wind turbine blades adds 2 dB to modeled noise levels. (p. 2)
- Because the ground is reflective and does not readily absorb sound in the winter, a ground absorption factor of $G=0.5$ is not conservative for the winter months. (p. 2)
- In the Mars Hill wind project, it was shown that wind shear at night on hilly terrain can cause noise to be 5 to 6 dB higher than modeled (pp. 2-3); Hankard uses the results of his measurements at projects in the western U.S. with flat terrain to argue for a contrary result.
- Health Canada has concluded that when modeling a long-term L_{night} level, 4.5 dB must be added to short-term model results expressed as L_{eq} . (p. 4)

These problems with Hankard's modeling method show that, contrary to the Siting Board's expectation, his approach to noise assessment is not conservative.

Respectfully submitted,

Gary A. Abraham



gaa/enc.

cc: Party List (via DMM and e-mail)