WEB Addison Solar

Matter No. 23-03015

Section 1101-2.16 Exhibit 16: Effect on Transportation

Revision 1

TABLE OF CONTENTS

EXHIBIT 16 Effect on Transportation 1

(a) Facility Site Access 1

(b) Existing Transportation Characteristics 1

(1) Vehicle Traffic, Use Levels and Accident Data 2

(2) Transit Facilities and Routes 2

(3) Emergency Routes 3

(4) Load Bearing and Structural Rating Information 3

(c) Facility Site Trip Generation 4

(1) Number, Frequency, and Timing of Vehicle Trip 4

(2) Cut and Fill Activity 5

(3) Conceptual Haul Routes and Approach and Departure Routes for Workers and Employees 6

(d) Traffic and Transportation Impact Assessment 6

(1) Comparison of Traffic with and without the Facility 6

(2) Evaluation of the Road System to Accommodate Projected Traffic 6

(3) Over-sized Deliveries 7

(4) Measures to Mitigate for Impacts to Traffic and Transportation 7

(5) Other Transportation Facilities 8

(e) Rail and Transit Impacts 8

(f) Federal Aviation Administration Notification 8

References 10

LIST OF TABLES

Table 16-1. Estimated Total Number of Heavy Vehicle Trips Required for Facility Construction 4

LIST OF APPENDICES

Appendix 16-A Route Evaluation Study – Revision 1

Appendix 16-B Federal Administration Aviation Correspondence – Revision 1

EXHIBIT 16 EFFECT ON TRANSPORTATION

On behalf of the Applicant, Fisher Associates, DPC (Fisher) conducted a Route Evaluation Study to identify and characterize anticipated haul routes, document existing conditions of public roads, estimate the vehicular trips generated by the construction and operation of the Facility, and identify potential impacts of the associated traffic. The Study Area for transportation consists of roadways and associated transportation infrastructure that will be used to access the Facility Site. This exhibit was prepared using a combination of existing information obtained from publicly available sources, including data from the New York State Geographic Information System Clearinghouse and the New York State Department of Transportation (NYSDOT). The methodology and results of the Route Evaluation Study (Appendix 16-A – Revision 1) are summarized herein.

(a) Facility Site Access

The Route Evaluation Study (Appendix 16-A – Revision 1) and the Preliminary Design Drawings (Appendix 5-A – Revision 1) for this Facility identify all access road locations and geometry, including those associated with the photovoltaic (PV) arrays, collection substation, and point of interconnection switchyard. The Facility is located on various parcels within the towns of Addison, Campbell, and Erwin, in Steuben County, New York with access provided from Interstate 86 Eastbound, County Route 4 (Curtis Hollow Road), Smith Hill Road, Irish Hill Road, Stapleton Road, John Rial Road, Beeman Hollow Road, and Balcom Road. The haul route selected for construction will be based on existing public road design, capacity, and weight restrictions. Driveway intersections were dispersed to eliminate concentrations of any driveway-related traffic and reduce vehicular movements at individual driveway access locations. All State and County roadways are in good condition and are anticipated to meet minimum sight distance triangles established by NYDOT for safe turning. The town roads should generally require local repairs with some road widening. Where the Project proposes new entrances along local roads, a field visit determined that no obstructions for safe turning were observed. However, proper road maintenance must be maintained to avoid potential obstructions by overgrown tree foliage. In addition, the Applicant will provide repaving with asphalt, adding gravel stone, and temporary traffic warning signs during construction to minimize safety impacts at these locations if deemed necessary by the Environmental Monitor during construction. Additional details such as approach routes, traffic usage, and sight lines are included as Appendices A, B, and C to Appendix 16-A – Revision 1. Information regarding road ownership, functional classification, and traffic volumes is included in the Route Evaluation Study in Appendix 16-A – Revision 1.

(b) Existing Transportation Characteristics

The Route Evaluation Study (Appendix 16-A – Revision 1) includes an analysis of existing road and traffic conditions in the vicinity of the Facility Site. Data on traffic volumes and accident frequency, school bus and emergency responder routes, and load-restricted bridges and culverts are also provided in Appendix 16-A – Revision 1 and summarized herein.

(1) Vehicle Traffic, Use Levels and Accident Data

Traffic volume data along proposed haul routes for the Facility were obtained from the NYSDOT Traffic Data Viewer and Highway Services website. One local road and one County Route (CR) have published traffic volume data: Curtis Hollow Road (CR-4) and Beeman Hollow Road. Curtis Hollow Road (CR-4) had data for two segments of the road; the first between Campbell to Tannery Road which had an Annual Average Daily Trips (AADT) of 215, and the second between County Route 1 and Campbell which had an AADT of 124. Beeman Hollow Road had an AADT of 151. All AADT data was from 2019. Although no published traffic volume data were available for other roads within the Study Area, the local roads appeared to operate below vehicle capacity due to the low traffic volumes. In addition, the roadway data that is available indicates that current traffic is below the design hour volumes; as such, a detailed capacity analysis was not completed for this Study. Field observations of the transportation network were completed, and no locations were revealed to have a traffic flow or capacity that would cause undue delay for the traveling public.

Existing information on accident data for the Study Area was obtained from the NYSDOT through a Freedom of Information Law request. Specifically, a Freedom of Information Law (FOIL) request was submitted on August 4, 2023, to the NYSDOT Region 6 in Hornell for information on accident data in the towns of Addison, Erwin, and Campbell. NYSDOT reported a total of 10 accident occurrences during the period of January 01, 2020, and September 09, 2022. The identified accidents included three animal accidents, three run off road accidents, three collisions with motor vehicles, and one collision with other. A breakdown of the NYSDOT accident data is included in Appendix 16-A – Revision 1.

(2) Transit Facilities and Routes

No airport, air strips, subway, rail, or other mass transit systems operate within the vicinity of the Facility Site. Accordingly, no impacts to these types of facilities are expected by the construction and operation of the Facility.

The Steuben County Transportation System has fixed bus routes within Steuben County; however, the routes are outside of the Facility Site. Requests can be made for route deviations to accommodate people not directly on the routes. The buses may experience minor delays if they encounter delivery vehicles on the larger transportation network. A copy of the Steuben County Transit System bus routes and schedules is attached in the Route Evaluation Report (Appendix 16-A – Revision 1).

The Applicant reviewed school district routes for those districts that serve the Facility Site. The potential proposed haul routes travel through Coring-Painted Post Area School District, Addison Central School District, and Campbell-Savona Central School District. The Applicant will coordinate with these districts to minimize potential impacts and delays to bus routes throughout the construction process. Local school districts will also be notified in advance of any road closures. It is anticipated that there will be minimal to no impacts to local bus routes.

(3) Emergency Routes

The emergency service provider stations in the vicinity of the Facility include Steuben County Sheriff, Addison Policy Department, Thurston Fire Department, Campbell Fire Department, East Campbell Fire Department, Corning Fire Department, Guthrie Corning Hospital, and AMR American Medical Response. The Applicant will advance consultations with emergency service providers to minimize potential impacts to emergency service routes throughout the construction process. If any transportation issues are identified, they will be addressed. Although road closures are not anticipated to be required during construction, local emergency service providers will be notified in advance of any temporary public road closures. A map of all emergency service provider locations and routes will be posted in the Facility's operations and maintenance building and will be provided to the emergency service providers and the Facility's local rapid response team in the Town of Corning. Therefore, it is anticipated that there will be minimal to no impacts to local emergency service routes.

Furthermore, the Safety Response Plan (Exhibit 6 [Public Health, Safety, and Security] – Revision 1, Appendix 6-B) provides detailed instructions and guidelines to be followed by site personnel and emergency responders in the event of a major emergency. The Applicant will have employees on-site trained in responding to emergency situations. Please see Exhibit 6 – Revision 1 for further discussion of on-site training and emergency response procedures.

(4) Load Bearing and Structural Rating Information

Existing bridge posting data were obtained from the NYSDOT Posted Bridge Interactive Map, the US Department of Transportation Federal Highway Administration Info bridge website, and Applicant correspondence with the Steuben County Public Works between September 2025 and January 2026, as well as site observations conducted by Fisher of the Study Area. There were nine bridges identified, two of which were identified as load-restricted bridges. One of the bridges (Smith Hill Road Bridge) was replaced in December 2024 and has bridge capacity of 90 tons. The second bridge (over the Cohocton River on County Route 4) is anticipated to be replaced in 2026 with a comparable load rating. Load-restricted bridges and culverts do not have capacity to accommodate vehicles over the identified posted weights, based on structural inspection reports. Therefore, bridge rating reports and further investigation into poorly rated or deficient structures will be necessary.

During on-site field reconnaissance, 45 small (less than 36-inch diameter) and nine large (36-inch diameter or larger) culverts were observed along potential transportation routes and were identified within the Study Area. Figure 4 of Appendix 16-A – Revision 1 provides a map of the identified culvert locations and provides the size, condition, and coverage of culverts observed under public roads along the planned delivery routes. It is assumed that less than two feet of ground coverage leaves a culvert susceptible to damage from heavy loads. Five culverts along proposed transportation routes were identified to have less than two feet of ground coverage. In addition, nine large culverts were flagged for additional evaluation. These culverts identified could be vulnerable to damage by large load deliveries if steps are not taken to improve or protect them (e.g., using steel plates). Any vulnerable locations will be evaluated further during final engineering to determine proposed use in final

transportation routes, and any necessary improvements or restoration to be implemented. This information will be provided as part of the Traffic Control Plan, submitted as a pre-construction compliance filing, pursuant to the requirements of Title 16 New York Codes, Rules, and Regulations (16 NYCRR) Section 1101-4.2(e)(8). The remaining culverts are in fair to good condition, with most having sufficient cover.

In addition, the Applicant consulted with Town and County highway supervisors at the public meeting held on February 26, 2025 and through additional correspondence and outreach (between September 2025 and January 2026), to obtain additional information on the type, thickness, widths, and restrictions of roads, as well as conditions of culverts and bridges (see Exhibit 2 [Overview and Public Involvement] – Revision 1, Appendix 2-A for a summary of Town and County coordination). Such consultations will continue throughout the Article VIII process and prior to construction in accordance with 16 NYCRR Section 1101-3.3(c).

(c) Facility Site Trip Generation

The following subsections provide an estimate of trip generation characteristics of the facility during construction.

(1) Number, Frequency, and Timing of Vehicle Trip

Exact scheduling of construction work and required vehicles will be determined by the Applicant's contractor prior to construction and in accordance with the construction hours in 16 NYCRR Section 1101-3.4(a); transportation of Facility components will involve numerous conventional and specialized transportation vehicles. Vehicular traffic generation from the proposed Facility will occur in two phases: Construction Phase and Maintenance & Operation Phase. The Construction Phase occurs first and is the most intensive, involving site preparation and clearing, construction of the solar infrastructure, removal of construction materials and debris, and site restoration. Following construction, the Maintenance and Operation Phase involves ongoing operation and maintenance of the Facility. Solar facilities are passive and will require a minimal number of vehicular trips during the Operation and Maintenance Phase.

A summary of the types of heavy construction vehicles that will be used to transport the Facility components and construction materials/equipment, as well as the number of trips generated, is provided in Table 16-1.

Table 16-1. Estimated Total Number of Heavy Vehicle Trips Required for Facility Construction

Component/Truck Type	Assumption	Trips
Solar Panels/WB-67 semi-trailer	261,120 Solar Panels at 720 per Truck	370
Various Components (transformer, tracker, piles, wire)/WB-67 or smaller	150 Deliveries	150
Gravel/Dump Truck	Gravel trucks, 10 cubic yards per truck, plus other construction equipment	5,400

Component/Truck Type	Assumption	Trips
Concrete/Concrete Truck	Concrete trucks, 10 cubic yards per truck, plus other construction equipment	37
Miscellaneous Deliveries (fuel, water, chemicals)	100 trips	100
	Total Heavy Vehicle Trips	**6,057**

Note: A trip is defined as entry and exit from the Project Area

Construction is anticipated to occur over an approximately 12-month period. Existing traffic may experience increased volume on delivery routes when construction vehicles are traveling to or from the Facility Site. In general, traffic impacts on the adjacent roadway network due to proposed construction activities are expected to be negligible due to the existing low traffic volumes on adjacent roadways and the rural character of the Facility Site.

In accordance with 16 NYCRR Section 1101-3.4(a), construction and routine maintenance activities at the Facility will occur between 7 a.m. and 7 p.m. Monday through Saturday, with the exception of construction and delivery activities, which may occur during extended hours beyond this schedule, as needed. Note that this condition does 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.

The operation of the Facility will require two full-time equivalent personnel workforce (see Exhibit 18 [Socioeconomic Effects] – Revision 1) to provide periodic inspection and maintenance of PV arrays and areas within security fences. Trips during operation are estimated to generate an average of two trips per day with a maximum of four trips per day and consist of smaller two-axle maintenance trucks with an occasional utility trailer for landscaping or mowing equipment. Heavier vehicles will be needed only if major Facility components require removal and/or replacement.

(2) Cut and Fill Activity

It is not anticipated that major cut and fill hauling activities will be necessary during construction. Fill material will be derived from excavated material within the Facility Site, some trips related to either cut or fill are anticipated and are included in Table 16-1. Stockpiled soils along the construction corridors will be used in site restoration, and all such materials will be placed to proposed grading contours as indicated in Exhibit 5 (Design Drawings) – Revision 1, Appendix 5-A – Revision 1. The Applicant will follow the New York State Department of Agriculture and Markets 2019 Guidelines for Solar Energy Projects - Construction Mitigation for Agricultural Lands recommendations for stockpiling topsoil and subsoil in agricultural areas, as well as the Stormwater Pollution Prevention Plan included in Exhibit 13 (Water Resources and Aquatic Ecology, Appendix 13-C). More information regarding cut and fill activity at the Facility is provided in Exhibit 5 (Design Drawings) – Revision 1 and in the Preliminary Design Drawings (Appendix 5-A – Revision 1).

(3) Conceptual Haul Routes and Approach and Departure Routes for Workers and Employees

Figure 2 of the Route Evaluation Study (Appendix 16-A – Revision 1) shows the proposed Facility Site transportation routes. The selected haul route for construction is based on existing public road design, capacity, and weight restrictions. Primary access roadways include County Route 4, which connects to Interstate 86 to the northeast; Smith Hill Road, which also connects to Interstate 86 to the northeast; and Beeman Hollow Road. Balcom Road, Stapleton Road, John Rial Road, and Irish Hill Road are secondary site access roadways. Individual site access driveways are also planned at various locations off of the aforementioned roadways, except John Rial Road and County Route 4. The major highways and interstates that will be used prior to reaching local highways do not require special analysis, as they are suitable for all intended uses and will not require alterations in traffic patterns due to their size. Any workers and employees in regular vehicles (pick-up truck size and smaller) will access the construction site and worker parking areas through use of whichever public road route is most logical and efficient for the respective individual.

As part of the Traffic Control Plan, which will be submitted as a pre-construction compliance filing consistent with 16 NYCRR Section 1101-4.2(e)(8), final haul routes will be developed in consultation with state, county, and local highway officials and will be accurately depicted in drawings submitted with the Plan.

(d) Traffic and Transportation Impact Assessment

The following subsections provide an analysis and evaluation of traffic and transportation impacts of the Facility.

(1) Comparison of Traffic with and without the Facility

The Facility is not a wind facility; therefore, the requirements of 16 NYCRR Section 1101-2.16(d)(1) are not applicable.

(2) Evaluation of the Road System to Accommodate Projected Traffic

The Route Evaluation Study provided in Appendix 16-A – Revision 1 includes a descriptive evaluation of the County and Town roads considered for use as a haul route, a construction vehicle route, and/or routes for Facility access. Included within the report is an assessment that evaluated existing road characteristics, Facility Site traffic generation (during construction and operation/maintenance), OS/OW deliveries, and a roadway capacity analysis. Traffic interferences are not anticipated along these routes during the construction or operation phases of the Facility, outside of what was noted in subsection (c)(1) above. Traffic associated with Facility operation will be negligible and limited to occasional trips associated with routine maintenance activities.

(3) Over-sized Deliveries

The main power transformer is the only oversized/overweight (OS/OW) delivery anticipated during construction of the Facility. As such, a special hauling permit for Oversized or Overweight vehicles may be required for the main transformer delivery to the Facility. The permit required will depend on the characteristics of the vehicle and its cargo, the number of trips, the distance traveled, and the duration. The Applicant will refer to NYSDOT Subpart 154-2 Divisible Load Overweight Permits for specific permit information and truck limitations and the contractor and/or delivery company will be responsible for obtaining any necessary Oversized or Overweight permits prior to construction.

As noted in the Route Evaluation Study and as further described above, existing roadway restrictions (height, width and weight) and deficient intersection radius locations were observed in the field and identified from public NYSDOT resources. The Applicant's traffic consultant drove all potentially impacted roads to identify physical restrictions/hazards. Although there are no weight restrictions along county roads, local roads may have load postings that will be determined by the Town highway supervisors at the time the road is needed as a transportation route.

The Applicant proposes to enter into a Road Use and Restoration Agreement (RUA) with the towns of Addison, Erwin, and Campbell as well as Steuben County as part of the road use permits for the Facility to address road improvements and/or repairs if damages that are caused by the Facility occur. In addition, the Applicant with coordinate with pertinent stakeholders such as the Town and County Highway departments and Corning-Painted Post Area School District, Addison Central School District, and Campbell-Savona Central School District during construction to ensure the delivery of the OS/OW transformer does not affect school bus routes. All pertinent permits and approvals for the OS/OW delivery will be obtained in accordance with 16 NYCRR Section 1101-3.1(d)(2).

(4) Measures to Mitigate for Impacts to Traffic and Transportation

No mitigation measures for traffic or transportation impacts are proposed at this time. No capacity improvements (e.g., traffic control devices) are projected to be required to accommodate the operation of the Facility as traffic volume is not expected to significantly increase. It is anticipated that all construction deliveries and other vehicles will be able to navigate the access routes without mitigation to roadway geometry. However, if improvements are needed for any unforeseen reason, they will be discussed and agreed upon with the appropriate owner, agency, or municipality prior to construction.

Final transportation routing will be developed in consultation with the NYSDOT, Steuben County Highway Department, and representatives from the towns of Addison, Erwin, and Campbell to avoid and/or minimize safety issues associated with the use of the approved haul routes in accordance with 16 NYCRR Section 1101-3.3(c). If damage to local, County, or State roads is caused by construction of the Facility, the Applicant will make repairs in accordance with a RUA that will be developed in consultation with the towns of Addison, Erwin, and Campbell as well as Steuben County. Repairs to the approved haul routes sustained during the construction of the Facility will be completed to a condition equal to or better than the roadway's condition prior to the Facility construction.

Before construction begins and throughout the construction process, the Applicant will coordinate with the County bus company, Corning-Painted Post Area School District, Addison Central School District, and Campbell-Savona Central School District, and local emergency service providers to avoid impacts and delays. They will also be advised in advance of any road closures and as necessary to develop an alternative route. A Traffic Control Plan will be developed and submitted as part of the compliance filings in accordance with 16 NYCRR Section 1101-4.2(e)(8) to reduce impacts to affected roads. By including measures such as scheduling of construction activities within the roadways and deliveries during off-peak hours as well as facility traffic by using flaggers and signage, it is expected that overall impacts to County bus system, local school district, and local emergency service providers will be minimal and no significant mitigation beyond coordination during construction is necessary.

(5) Other Transportation Facilities

The Applicant is not aware of any other transportation facilities, such as air or marine based facilities, that will be used to transport supplies to the Facility Site.

(e) Rail and Transit Impacts

No rail mass transit systems are expected to be significantly impacted by the Facility as no rail systems operation within the Study Area. The Steuben County Transportation System has fixed bus routes within Steuben County; however, the routes are outside of the Facility Site. Requests can be made for route deviations to the Steuben County bus routes to accommodate people not directly on the routes. The buses may experience a minor delay if they encounter delivery vehicles along the larger transportation routes. However, it is anticipated that overall impacts to the bus routes will be minimal, and no significant mitigation beyond the ongoing coordination is necessary.

The Facility is not anticipated to impact airports and airstrips. There are no public or private airports within the Facility Site. Two airports are within 5 miles of the Facility Site; Corning-Painted Post Airport, located approximately 1.3 miles from the Facility Site and a private airstrip located approximately 2.3 miles away.

(f) Federal Aviation Administration Notification

As mentioned above, there are no public or private airports within the Facility Site. The closest airport is the Corning-Painted Post Airport, located approximately 1.3 miles from the Facility Site. The Federal Aviation Administration (FAA) Notice Criteria Tool summarizes the filing requirements specified in Title 14 Code of Federal Regulations Part 77.9 and advises if a file notice to the FAA is required. The Applicant consulted the FAA Notice Criteria Tool on August 13, 2026, August 14, 2026 and October 7, 2026 using high-end estimate heights for Facility structures throughout the Facility Site including 15 feet for solar panels, 65-83 feet for the substation and POI structures, and an assumed maximum construction crane height of 40 feet, as well as the exact height (30 to 74.5 feet) and elevation data for the representative overhead collection line poles. According to the Notice Criteria Tool output (Appendix 16-B – Revision 1), FAA notice is required prior to construction for certain proposed overhead collection line pole

locations. Specifically, poles 32 through 100 have been identified as requiring FAA consultation, while poles 31 and 101, as well as poles outside of this range, do not require FAA notice. FAA notice is also not required for the construction cranes, the substation/POI structures, or the solar panels.

The Applicant is fully committed to engaging with the FAA in this consultation process. The FAA requires notice at least 45 days prior to the start of the proposed construction, but the Applicant plans on submitting notice earlier to allow sufficient time for the process and ensure that appropriate consultation occurs prior to construction. The Applicant is in the process of preparing the notice package for the FAA, which includes the pair of geographic coordinates, site elevation, and total structure height for the tallest point when measured from ground level for each of the 69 poles, along with a full description of each structure (including the nature, dimensions, and construction materials), as well as other details and supporting information that explain the construction and the description of the Project as a whole. Should the FAA identify any necessary modifications, the Applicant has sufficient site control and design flexibility to evaluate and implement appropriate measures, if required (see Exhibit 4 – Revision 1 and Appendix 4-A – Revision 1).

REFERENCES

New York State Department of Agriculture and Markets (NYSDAM). 2019. *Guidelines for Solar Energy Projects – Construction Mitigation for Agricultural Lands*. Available at: https://agriculture.ny.gov/system/files/documents/2019/10/solar_energy_guidelines.pdf (Accessed October 2023).