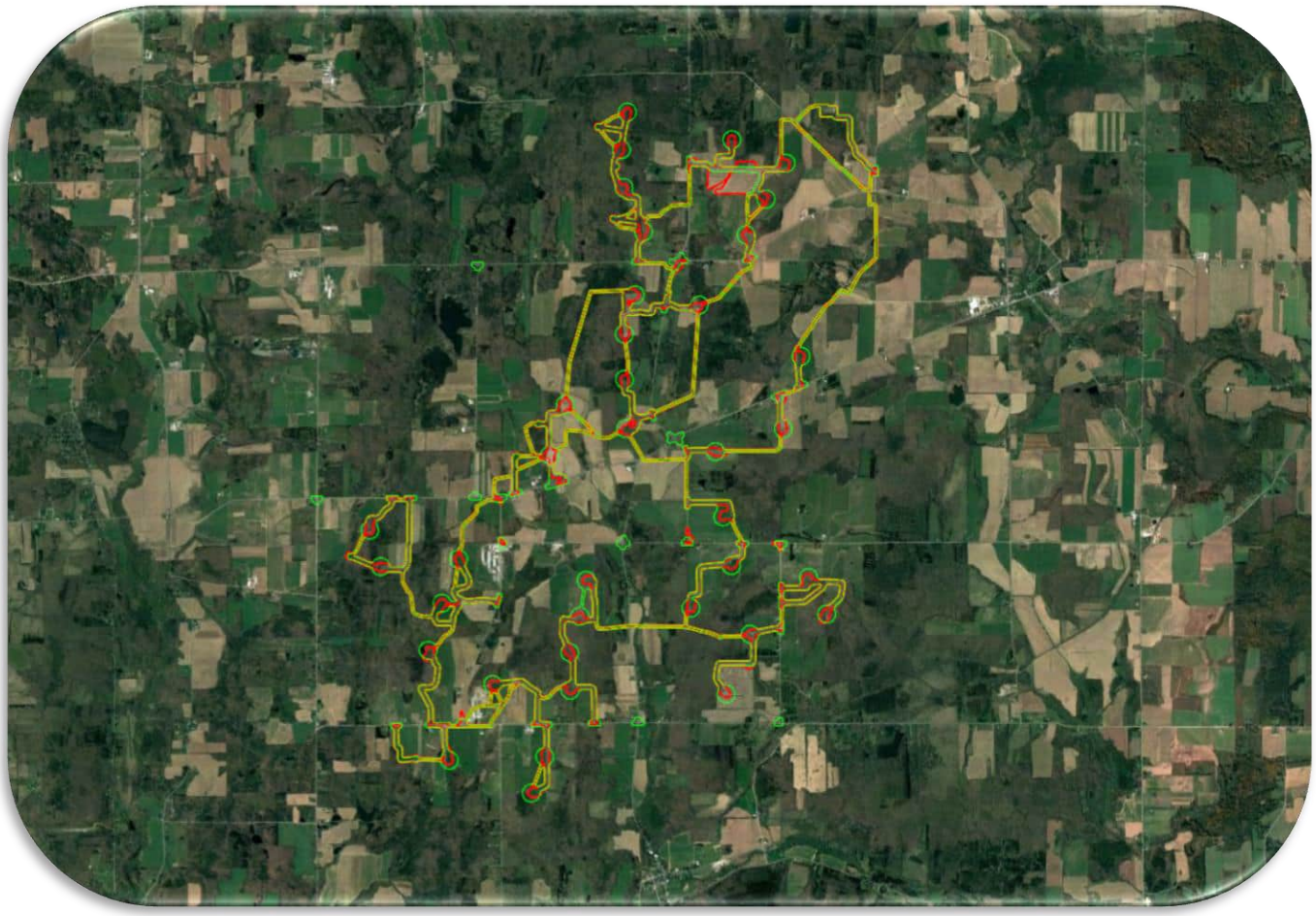
Appendix 16-B
Traffic Analysis Report

AES Corporation

WETHERSFIELD WIND REPOWERING PROJECT

TRAFFIC ANALYSIS REPORT

Revised April 2025



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April 7, 2025

Briggs Neal, Project Developer
AES Clean Energy Development, LLC
292 Madison Avenue
15th Floor
New York, NY 10017

Re: Wethersfield Wind Project – Effect on Transportation Report

Dear Mr. Neal,

WSP USA, Inc. has conducted a traffic assessment of the proposed Wethersfield Wind Repowering Project (Repowered Facility) in the Towns of Eagle and Wethersfield, Wyoming County, New York. A summary report on the findings is provided herein. The assessment is configured to address items required in New York Public Service Law Article VIII, Exhibit 16 Effects on Transportation.

A. PROJECT LOCATION, DESCRIPTION AND SCHEDULE

AES is proposing to repower portions of the existing Wethersfield Windpark, a 126-megawatt, alternating current (AC) medium-voltage facility, in Eagle and Wethersfield, Wyoming County, New York (for parcel location, site access roadways and regional routing, see Figure 16-1 in Appendix 16-A). The Repowered Facility will be located on numerous individual and contiguous property parcels along W. Hill Road, Hobday Road, Hall Road, New York State Route (NY) 78, Pee Dee Road, Mote Road, Wolcott Road, Poplar Tree Road, Hubbard Road, Maxwell Road, and Horton Road. The Repowered Facility will cover approximately 8,455 acres on various parcels of private land, but not all of which will be developed as part of the Repowered Facility. The Repowered Facility will include up to 35 new wind turbines; buried AC medium voltage collector circuits; fencing and gates around each turbine; access roads; temporary laydown/construction support areas; a 34.5-kilovolt (kV) to 230 kV voltage collection substation, with a control building, associated equipment and fenced areas; a point of interconnection switchyard station, with associated equipment and fenced area (to be owned by New York State Electric and Gas (NYSEG)); and an operations and maintenance (O&M) building.

Construction is anticipated to begin in the fourth quarter of 2026, with a 18-month construction timeline.

B. PRE-CONSTRUCTION SITE CHARACTERISTICS

The Facility Site parcels and interconnection point are in the Towns of Eagle and Wethersfield in Wyoming County. The following sections describe the access roadway network to the parcels associated with the Facility Site.

Traffic Volume and Accident Data

US Route (US) 20A – US 20A is an east-west US highway that runs from an intersection with US 20 in the town of Hamburg, New York to NY 5 in the town of East Bloomfield, New York. The roadway carries 10,115

average annual daily traffic (AADT) near the Facility Site.[1] The asphalt-paved undivided highway is one lane in each direction and has a posted speed limit of 45 miles per hour (mph). The roadway width is approximately 24 feet with 12-foot travel lanes and approximately 7-foot-wide shoulders. The peak period traffic volume is 786 vehicles in the AM peak and 1,115 in the PM peak (total in both directions). Peak traffic periods are 6:45 a.m. to 7:45 a.m. and 3:30 p.m. and 4:30 p.m.

NY 78 – NY 78 is an east-west New York state highway that runs from an intersection with NY 19 in the village of Gainesville to an intersection with NY 18 in the hamlet of Olcott. The roadway carries from 1,141 AADT to 1,575 AADT near the Facility Site.[2] The asphalt-paved roadway is one lane in each direction. It has a posted speed limit of 35 mph within the Hamlets of Strykersville and Java Village, otherwise the route has a statutory speed limit of 55 mph. The roadway width is approximately 24 feet with 12-foot travel lanes and approximately 8-foot-wide shoulders. The peak period traffic volume is 136 vehicles in the AM peak and 183 in the PM peak (total in both directions). Peak periods are 9:00 a.m. to 10:00 a.m. and 4:00 p.m. to 5:00 p.m.

NY 19 – NY 19 is a north-south New York state highway that runs from an intersection with Lake Ontario State Parkway in Hamlin, New York to the Pennsylvania state line in Willing. The roadway carries 2,042 AADT near the Facility Site.[3] The asphalt-paved roadway is one lane in each direction. It has no posted speed limit near the Facility Site, otherwise the route has a statutory speed limit of 55 mph. The roadway width is approximately 24 feet with 12-foot travel lanes and approximately 9-foot-wide shoulders. The peak period traffic volume is 148 vehicles in the AM peak and 218 in the PM peak (total in both directions). Peak periods are 7:15 a.m. to 8:15 a.m. and 4:30 p.m. to 5:30 p.m.

NY 19A – NY 19A is a north-south New York state highway that runs from an intersection with NY 19 in Hume, New York to an intersection with NY 19 in Silver Springs, New York. The roadway carries 2,253 AADT near the Facility Site.[4] The asphalt-paved roadway is one lane in each direction. It has a posted speed limit of 30 mph in the Village of Silver Springs and a posted speed limit of 45 mph in the Village of Castile, otherwise the route has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 6-foot-wide shoulders. The peak period traffic volume is 207 vehicles in the AM peak and 243 in the PM peak (total in both directions). Peak periods are 7:30 a.m. to 8:30 a.m. and 3:00 p.m. to 4:00 p.m.

NY 39 – NY 39 is an east-west New York state highway that runs from an intersection with US 20 near Sheridan, New York to an intersection with NY 5 in Avon, New York. The roadway carries 3,116 AADT near the Facility Site.[5] The asphalt-paved roadway is one lane in each direction. It has a posted speed limit of 35 mph in the Village of Perry and a posted speed limit of 30 mph in the Town of Leicester, otherwise the route has a statutory speed limit of 55 mph. The roadway width is approximately 24 feet with 12-foot travel lanes and approximately 7-foot-wide shoulders. The peak period traffic volume is 267 vehicles in the AM peak and 285 in the PM peak (total in both directions). Peak periods are 7:00 a.m. to 8:00 a.m. and 3:30 p.m. to 4:30 p.m.

[1] New York State Department of Transportation (NYSDOT). Not dated. Traffic Data Viewer https://www.dot.ny.gov/tdv. Accessed March 27, 2025.
[2] *ibid.*
[3] *ibid.*
[4] *ibid.*
[5] *ibid.*

NY 36 – NY 36 is a north-south New York state highway that runs from the Pennsylvania state line in South Troupsburg, New York to an intersection with NY 31 in Ogden, New York. The roadway carries 4,345 to 7,756 AADT near the Facility Site.[6] The asphalt-paved roadway has one to two lanes in each direction. It has a posted speed limit of 30 mph in the Town of Leicester, otherwise the route has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and shoulders with widths varying between 5 and 9 feet. The peak period traffic volume is 300 vehicles in the AM peak and 386 in the PM peak (total in both directions). Peak periods are 7:00 a.m. to 8:00 a.m. and 4:00 p.m. to 5:00 p.m.

NY 408 – NY 408 is a north-south New York state highway that runs from an intersection with NY 63 in Groveland, New York to an intersection with NY 70 in Nunda, New York. The roadway carries 7,874 AADT near the Facility Site.[7] The asphalt-paved roadway is one lane in each direction. It has a posted speed limit of 30 mph in the Village of Mount Morris, otherwise the route has a statutory speed limit of 55 mph. The roadway width is approximately 24 feet with 12-foot travel lanes and shoulder widths ranging between 4 and 11 feet. The peak period traffic volume is 617 vehicles in the AM peak and 884 in the PM peak (total in both directions). Peak periods are 7:15 a.m. to 8:15 a.m. and 4:00 p.m. to 5:00 p.m.

Hall Road – Hall Road is an east-west road connecting Maxwell Road to NY 362. Located within Wyoming County, it is maintained by the Town of Wethersfield. The roadway carries about 48 AADT near the Facility Site.[8] The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders. The peak period traffic volume is 7 vehicles in the AM peak and 10 in the PM peak (total in both directions). Peak periods are 6:45 a.m. to 7:45 a.m. and 3:15 p.m. to 4:15 p.m.

Hobday Road – Hobday Road is an east-west road connecting NY 362 to Hardys Road. Located within Wyoming County, it is maintained by the Town of Wethersfield. The roadway carries about 25 AADT near the Facility Site.[9] The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders. The peak period traffic volume is 3 vehicles in the AM peak and 5 in the PM peak (total in both directions). Peak periods are 6:30 a.m. to 7:30 a.m. and 3:30 p.m. to 4:30 p.m.

Pee Dee Road – Pee Dee Road is an east-west road connecting NY 78 to Poplar Tree Road. Located within Wyoming County, it is maintained by the Town of Wethersfield. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

Mote Road - Mote Road is an east-west road connecting Poplar Tree Road to Hermitage Road. Also known as County Road 53, it is maintained by the Wyoming County. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 5-foot-wide shoulders.

Wolcott Road – Wolcott Road is a north-south road connecting Shaw Road to Smallwood Road. Located within Wyoming County, it is maintained by the Town of Wethersfield. The roadway is asphalt-paved between Shaw Road and Mote Road and gravel and oil between Mote Road and Smallwood Road. one lane in each

[6] *ibid.*
[7] *ibid.*
[8] *ibid.*
[9] *ibid.*

direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

Poplar Tree Road – Poplar Tree Road is a north-south road that connects Wilder Road to NY 78. Between NY 78 and Pee Dee Road, it is also designated as Wyoming County Road (CR) 57. The road is maintained by Wyoming County. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

Maxwell Road – Maxwell Road is a north-south road connecting NY 78 to W. Hill Road. Located within Wyoming County, it is maintained by the Town of Eagle from 5974 Maxwell Road to W. Hill Road and by the Town of Wethersfield from 5974 Maxwell Road to NY 78. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 20 feet with 10-foot travel lanes and approximately 6-foot-wide shoulders.

Hubbard Road – Hubbard Road is a north-south road connecting NY 78 to Hobday Road. Located within Wyoming County, it is maintained by the Town of Wethersfield. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

Horton Road – Horton Road is a north-south road connecting Garry Road to Hobday Road. Located within Wyoming County, it is maintained by the Town of Eagle from 5988 Horton Road to Garry Road and by the Town of Wethersfield from 5988 Horton Road to Hobday Road. The gravel and oil roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

Garry Road – Garry Road is an east-west road connecting NY 362 to E. Hillside Road. Located within Wyoming County, it is maintained by the Town of Eagle. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

W. Hill Road – W. Hill Road is an east-west road connecting Youngers Road to NY 362. Located within Wyoming County, it is maintained by the Town of Eagle. The asphalt-paved roadway is one lane in each direction. It has a statutory speed limit of 55 mph. The roadway width is approximately 22 feet with 11-foot travel lanes and approximately 4-foot-wide shoulders.

A Freedom of Information Law request for accident information in the Study Area was submitted to New York State Department of Transportation (NYSDOT) on March 25, 2025. Information was received on April 2, 2025 (R006304-032525). A total of 277 accidents occurred in the Study Area along the proposed primary, secondary, and access haul routes during the three-year period from September 2021 through September 2024. Half of the accidents (50%) only involved collisions with deer or other animals, with 14 accidents (5%) involving collisions with deer or other animals, and an additional 38 accidents (14%) occurring when a vehicle ran off the road. Of these 277 accidents, 87 involved collisions between two or more vehicles (31%). There were 4 fatalities from accidents within the Study Area along haul roads. A breakdown of the accident severity for the collisions identified during the three-year period is shown in Table 1.

Table 1. NYSDOT Accident Severity Summary

Year	Injury	Fatality	Property Damage	Non-Reportables	Total
2021 (partial)	3	0	28	1	**32**
2022	15	1	81	2	**99**
2023	8	1	84	4	**97**
2024 (partial)	8	0	39	2	**49**
Total	**34**	**2**	**232**	**9**	

Key:

NYSDOT = New York State Department of Transportation

Transit Facilities, School District, and Bus Routes

The following transit agencies provide service within or near the Facility Site:

- The Regional Transit Service - Wyoming County provides fixed-route transit services within the county. Routes 223, 224, and 225 utilize NY 39 and NY 78 near the Facility Site to service stops within Wethersfield, New York. In addition, the bus will deviate ¾ mile from the route upon request.

The Facility Site is located within the Letchworth Central School District, Pioneer Central School District, and the Warsaw Central School District. School bus routes in the area change yearly based on population needs and are not fixed. While construction-related traffic to and from the Facility Site is not anticipated to affect any school bus operations because of the limited impact the traffic will have on these low-volume roadways, AES will coordinate with the Letchworth, Warsaw Central, and Yorkshire-Pioneer School Districts during construction to ensure that any temporary increases in traffic or oversized deliveries do not affect school bus routes.

Emergency Service Provider Routes

The Wyoming County Office of Emergency Services is responsible for overall planning and response coordination for emergencies in the county. The Wyoming County Sheriff's Office operates the region's 911 Dispatch Center, which provides

state-of-the-art, county-wide radio communications and computer-aided dispatch services to all emergency service agencies. There are 16 volunteer and two municipal emergency medical services agencies, 18 volunteer fire departments, one Sheriff's Office, and four town police departments serving Wyoming County. The Wyoming County Community Health System operates the region's 24-hour emergency rooms and is located approximately 16 miles from the Facility Site in Eagle and Wethersfield, New York. Emergency medical technicians and fire department access to the Facility Site will follow the vehicle and truck access routes, as detailed in Section C of this report.

Load Bearing and Structural Rating Information

There is one load-restricted (R-Posted) bridge on NY 39, south of the Facility Site, and a nine-ton weight limit on NY 20A east of Warsaw, NY. According to inspection reports, R-Posted bridges and culverts do not have the reserve capacity to accommodate vehicles over legal weights but can still safely carry legal weights. These bridges are identified with signage stating "No Trucks with R Permits." Options for crossing a R-Posted/Restricted bridge include the following:

- Cross the prohibited R-Posted bridge at legal weight;
- Take a detour around the bridge along state highways; or
- Obtain permission from local authorities for a shorter detour route off the state highway system.

There are no other weight-restricted bridge structures or large culverts on roadways proposed for access to the Facility Site. Existing bridge posting data were acquired from the NYSDOT Posted Bridge Interactive Map. A desktop review of small culverts was conducted. Locations of small culverts within the study area are not publicly accessible if they are even mapped by the jurisdiction. Figure 16-2 in Exhibit 16 Transportation, Appendix 16-A shows the location of culverts that have been identified for the use of AES in discussions with local jurisdictions. Locations of all small culverts will be confirmed by AES or their contractor with NYSDOT, the Town of Eagle, the Town of Wethersfield, and Wyoming County prior to construction.

C. DAILY TRIP GENERATION VEHICLE DATA AND DISTRIBUTION

Traffic generation from the Facility Site will occur in two phases. The first and most intensive will be during the construction phase, and the second will be during the O&M phase. During the construction phase, vehicle trips will occur to prepare and clear the various parcels, construct the foundations and supporting infrastructure, and supply and clear the Facility Site of construction materials and debris. Following construction, the operations move into a standard generation support type of operation. Because the operation of a wind energy center is relatively passive, only a minimal number of vehicular trips to and from the Facility Site are anticipated once normal generation operations commence. Table 2 summarizes the anticipated traffic generated in each of the two phases for the Repowered Facility.

Table 2. Vehicle Trip Generation Summary

Project Phase	Duration	Assumption	Truck Type and Estimated Gross Vehicle Weight (lbs)	Vehicles per Day	Maximum and Average Trips Per Day
Site Preparation and Construction					
Tree Clearing	2-3 weeks	244 acres of tree clearing required	Logging trucks and related equipment, 40,000–60,000	20-35 trucks/day	Maximum: 70 Average: 40

Project Phase	Duration	Assumption	Truck Type and Estimated Gross Vehicle Weight (lbs)	Vehicles per Day	Maximum and Average Trips Per Day
Aggregate Base	20–30 weeks	84,400 CY of aggregate required, 10 CY per truck	Gravel trucks, 30,000	25-35 trucks/day	Maximum: 140 Average: 100
Project Cut/Fill	20-30 weeks	165,850 CY of net cut	Earthwork Dump Truck, 50,000	50-70 trucks/day	Maximum: 280 Average: 200
Turbine Blades	70–80 weeks	3 blades per turbine, 1 blade per truck	Beam trailer, 97,000	2–3 trucks/day	Maximum: 6 Average: 4
Towers		6 tower sections per turbine, 1 tower section per truck	13-axle Double Schnabel or Schnabel dolly, 195,000–250,000	2–3 trucks/day	Maximum: 6 Average: 4
Nacelle and Hub		4 trucks per combination	13-axle trailer, 254,000	9-13 trucks/day	Maximum: 26 Average: 18
Crane			40,000–80,000	8–16 trucks	Maximum: 32 Average: 16
Concrete			Mixer truck, 7 0,000	35 trucks/day	Maximum: 70 Average: 70
Passenger Vehicles			2,000–10,000	50–70 cars/day	Maximum: 235 Average: 120
Maintenance and Operations					
Operations and Maintenance	Weekdays	Utility Vehicles	2,000–10,000	3 vehicles/day	Maximum: 7 Average: 4

Key:

CY = cubic yards

lbs = pounds

Construction Traffic Trip Generation

The majority of traffic generated by construction of the Repowered Facility will occur after the initial site preparation work during the 18-month Repowered Facility construction period. During this time, materials and equipment will be delivered and the wind turbines will be installed. This traffic will primarily comprise site worker passenger vehicles, along with a smaller number of delivery and supply vehicles. Construction-related traffic trips will be temporary in duration and will conclude as the phases of construction are completed.

As noted, the primary construction-related traffic will be passenger vehicles. At peak construction, approximately 70 workers could be on site at any given time. Due to the numerous parcels, 50 to 70 passenger vehicles per day could be anticipated to access the overall Facility Site, with a combined maximum of 235 and average of 120 trips per day.

A breakdown of the delivery truck vehicular traffic includes wind turbine blades (2 to 3 trucks per day), tower sections (2 to 3 trucks per day) and nacelles (9 to 13 trucks per day). Delivery truck traffic to and from the Facility Site is generally anticipated to occur outside the peak AM and PM traffic periods along the adjacent roadways. Fuel delivery (1 to 2 trucks per day) and water delivery trucks (1 per day) are expected to visit the Facility Site, but their delivery times will vary during the day and will generally be outside the AM and PM peak traffic periods. An average of 26 oversized truck trips per day from these vehicles during the peak construction period are anticipated to, from, and within the Facility Site. These deliveries will not occur every day and will vary based on the permits received from NYSDOT.

Significant cut and fill activity is anticipated during the initial site work and construction. The net earthwork will be approximately 165,850 cubic yards of cut. Daily deliveries will follow an estimated delivery schedule as required to support the construction timeline. It is anticipated that all cut/fill truck movements will use the primary haul routing, as indicated on Figure 16-1 in Exhibit 16 Transportation, Appendix 16-A.

Project-related traffic during all phases will not be significant during the AM and PM peak periods. Construction-related passenger vehicle trips and delivery truck traffic will be scheduled and are anticipated to occur mainly outside the roadway peak traffic periods. Given the low volume of traffic on the adjacent roadways even during peak periods, the portions of traffic that will overlap the peak periods are not anticipated to significantly impact the traffic operations along these roadways during those times.

At least 494 oversized deliveries will occur during the construction phase of the Repowered Facility. Oversized deliveries are anticipated for the transformer, wind turbine blades, nacelles, hubs, cranes, and tower sections. The estimated dimensions and weights of the loaded oversized specialized equipment (based on the largest component dimensions) are discussed below. It is anticipated that intersection improvements will be required for the delivery of the oversized equipment; details are included for the wind turbine components in the AES Valcour – Wethersfield Remote Transport Assessment (see Appendix 16-D). Temporary traffic stoppages and delays for delivery of the oversized equipment are expected outside of the peak periods. These events will be communicated to the public and other stakeholders, so they are aware of potential delays. It is assumed that the other equipment will be delivered via a WB-67 truck and trailer combination, or smaller vehicle.

Due to the overall minimal trips generated by the construction of the Repowered Facility, the existing low volume of traffic along the site access roadways, and the rural nature of the Facility Site (not an urbanized congested location), the traffic impacts on the roadway operating level of service during construction will be negligible. No detailed intersection or linear roadway analysis was conducted due to the minimal volumes of traffic anticipated to be generated by the Facility Site.

Oversized Equipment Trailers

There will be 114 deliveries for the turbine bales, 152 deliveries for the nacelles, and 228 deliveries for the tower sections traveling from either the Port of Buffalo or the Port of Erie to the Facility Site. Because the specific delivery vehicles are not yet known, possible trailer types were assumed that may be able to carry the oversized wind turbine components (see Tables 3 through 6). No upgrades to the existing substation are anticipated that would require oversize deliveries.

Table 3. V150 Wind Turbine Blade Estimated Total Weights and Dimensions

	Width	Height	Length	Weight
Beam Trailer	13 feet, 6 inches	15 feet, 6 inches	265 feet	97,000 pounds

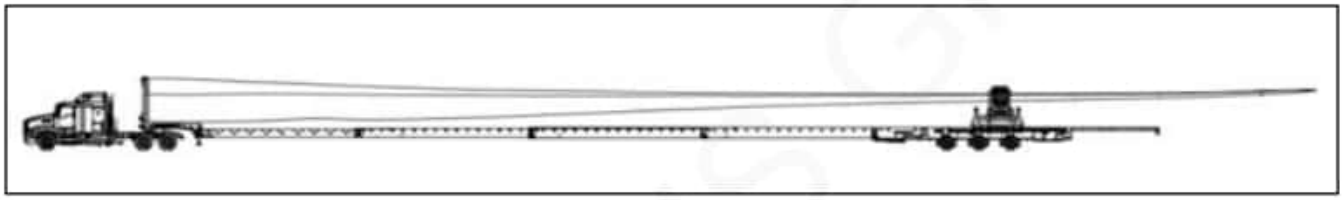

Figure 1: Wind Turbine Trailer Configuration

Table 4. 13-Axle Nacelle Estimated Total Weights and Dimensions

	Width	Height	Length	Weight
Trailer	14 feet	14 feet	141 feet	254,000 pounds

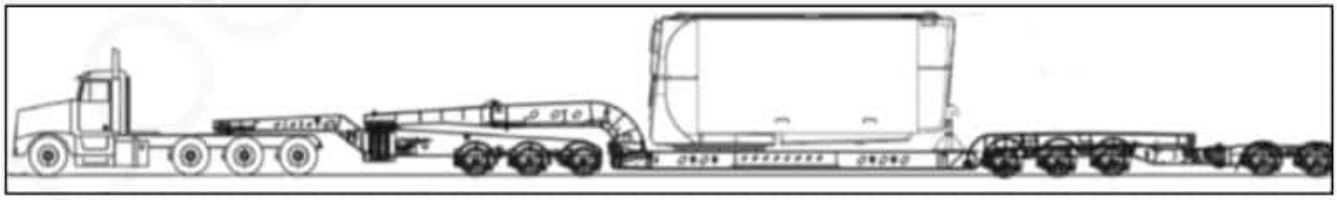

Figure 2: Nacelle Trailer Configuration

Table 5. 13-Axle Double Schnabel (Base and Mid Tower Sections) Estimated Total Weights and Dimensions

	Width	Height	Length	Weight
Trailer	15 feet	16 feet, 6 inches	190 feet	250,000 pounds

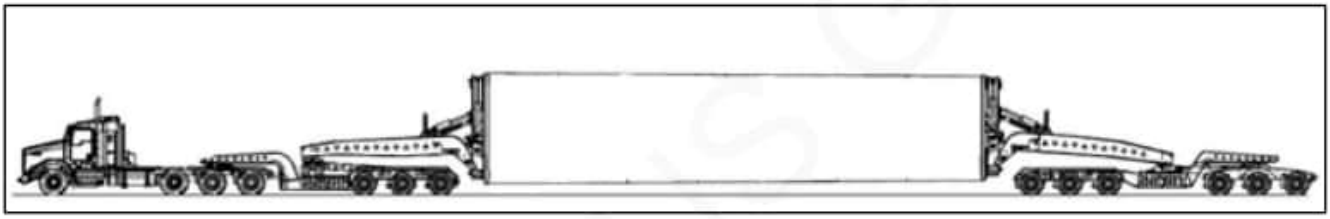

Figure 3: Base and Mid Tower Section Schnabel Configuration

Table 6. Schnabel Dolly (Top Tower Section) Estimated Total Weights and Dimensions

	Width	Height	Length	Weight
Trailer	12 feet	13 feet, 6 inches	135 feet	195,000 pounds

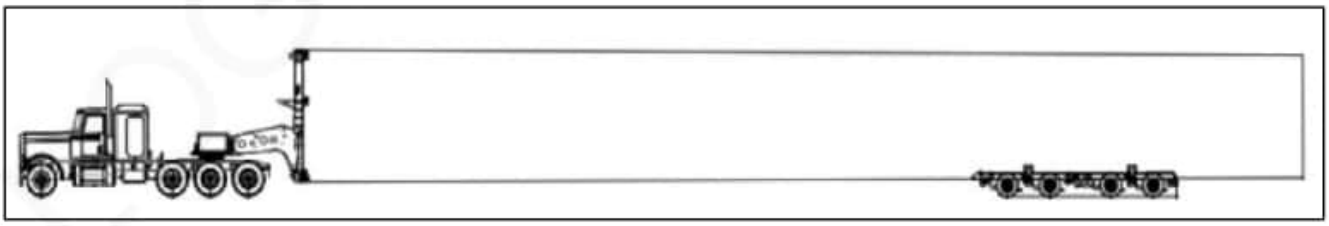

Figure 4: Top Tower Section Schnabel Dolly Configuration

Based on the assumed vehicles, roadway improvements to accommodate the radius of legal load delivery vehicles will be required. AES will work with state permitting agencies and the local jurisdictions to ensure that the appropriate measures are implemented to avoid or minimize impacts on the roadway and the potential for vehicle crashes for large and oversized delivery vehicles. AES will submit a Traffic Control Plan in accordance with 16 New York Codes, Rules and Regulations § 1100-10.2(e)(8) that includes the road use agreements and the final specific measures to ensure safety and minimize potential delays to local traffic during construction.

General mitigation measures may include the following:

- Facilitate traffic by using flaggers, signage, and barricades to guide vehicles through or around construction zones; AES 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 oversized deliveries during off-peak hours to the extent feasible, including night or weekend work.
- 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.
- Notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of location, date, and time of scheduled oversized deliveries.

Cut and Fill Activity

Installation of wind turbines does not require significant grading or topography modifications. Most grading on the Facility Site will be performed to support access road construction and required erosion and sedimentation measures. Significant cut and fill activity is anticipated during the initial site work and construction. Activities related to construction will generate approximately 518,950 cubic yards of cut and 353,100 cubic yards of fill. The net earthwork will be approximately 165,850 cubic yards of cut. It is anticipated that all cut/fill truck movements will use the primary haul routing, as indicated on Figure 16-1 in Appendix 16-A.

Maintenance and Operations Traffic Trip Generation

The Repowered Facility is anticipated to employ four full-time operations personnel. As a result, the operation and maintenance of the Repowered Facility will generate minimal vehicular traffic. Three utility-type maintenance vehicles are expected to support the Facility Site operations. These vehicles will generate an average of four trips per day, with a maximum of four 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. Water delivery trucks are anticipated to make occasional, sporadic trips (one per week) to

the Facility Site; their delivery times will vary during the day and will generally be outside the AM and PM peak traffic periods. Typical O&M procedures for the Repowered Facility will include the following:

- Inspection of each of the wind sites on a frequency of at least once per week
- Informal site inspections and corrective maintenance for the Repowered Facility on an as-needed basis
- Ground maintenance of the Repowered Facility during growing-season months, a couple of times per year for mechanical mowing

Facility Site Approach and Departure Routes

The majority of site-generated traffic will use NY 78, mainly from US 20A or NY 19.

As noted, the Repowered Facility will be located on numerous parcels within the Towns of Eagle and Wethersfield. Thus, access to each parcel can vary and is contingent on the location of the turbine site driveway access to the adjacent roadway system. The equipment laydown area is located in a parcel near the intersection of Poplar Tree Road, Pee Dee Road, and Mote Road. From the laydown area, trucks will utilize Poplar Tree Road, Pee Dee Road, Mote Road, Wolcott Road, NY 78, Hubbard Road, Hall Road, Hobday Road, Maxwell Road, W. Hill Road, Garry Road, and Horton Road to access the turbine sites.

Figure 16-2 in Exhibit 16 Transportation Appendix 16-A illustrates the parcel locations, proposed driveway, property access routing and connection points, and the roadway network around those locations.

Construction workers and employees of the Repowered Facility will generally access the parcels via the regional access routes as indicated in Figure 16-1 in Appendix 16-A. Most employees will likely arrive at the site from the west or northeast via NY 78, connecting either from US 20A or I-390. Other employees may use alternative routes along the regional arterial roadway network.

The Facility Site is in a rural part of Wyoming County, mainly off secondary roadways with no assumed critical intersections, and not in or near a congested urbanized area. Since the number of trips generated by the maintenance and operation of the Repowered Facility will be minimal, the existing traffic along the Facility Site access roadways is low, and the Facility Site is in a rural area (not an urbanized congested location), traffic impacts on the roadway operating level of service will be negligible. No detailed intersection or linear roadway analysis was conducted because of the minimal volumes of traffic anticipated to be generated by the Facility Site.

Parking and Driveway Access

During construction of the Repowered Facility, staging areas will be provided to avoid vehicles parking on public roads. Parking will not be allowed to occur on any public roadways near the Repowered Facility.

Access to the proposed wind turbines utilizes some driveways already present for the existing wind turbines. Driveway access to the various parcels associated with the Repowered Facility has been reviewed based on traffic constraints (such as acceptable sight distance, offset from adjacent driveways, and turning radius) and to produce the least opportunity for impacts related to erosion and sedimentation and post-construction stormwater resources. Due to the number of wind turbines included in the overall Facility Site, there are 26 driveway locations within the Study Area. Driveway access locations are indicated in Figure 16-2 in Appendix 16-A.

All driveway accesses are located on secondary local roadways. Limited O&M efforts are required at the parcels associated within the Facility Site; thus, traffic turning into and out from the driveway locations will be minimal. Driveway opening sizes and required radii of the pavement connection will be designed to support the delivery of the oversized equipment. Once construction of the wind turbines is complete, portions of the temporary driveways that are no longer required for legal-size vehicles will be returned to natural conditions.

An intersection sight distance review was conducted for each of the 26 proposed driveway intersections, based on American Association of State Highway and Transportation Officials standards, and is summarized in figures included in Exhibit 16 Transportation, Appendix 16-C. The sight distance review was conducted for a single-unit truck for the assumed prevailing speed, based on the posted or statutory speed limit. The driveway intersection sight distance review may be summarized as follows:

- Met 6 – Driveway Access along W. Hill Road
  - Left Sight Distance – Restricted to 445 feet due to foliage
  - Right Sight Distance – Adequate
  - Recommendation – Cut back foliage to maintain adequate sight distance.
- Met 9 – Driveway Access along NY 78
  - Left Sight Distance – Restricted to 432 feet due to a vertical sag.
  - Right Sight Distance – Adequate
  - Recommendation – N/A
- Roadway 2 – Driveway Access along NY 78
  - Left Sight Distance – Restricted to 556 feet due to foliage
  - Right Sight Distance - Restricted to 323 feet due to foliage and 609 feet due to a vertical crest
  - Recommendation – Cut back foliage to maintain adequate sight distance
- Roadway 3 – Driveway Access along Maxwell Road
  - Left Sight Distance – Restricted to 670 feet due to foliage.
  - Right Sight Distance – Adequate
  - Recommendation – Cut back foliage to maintain adequate sight distance.
- Roadway 5 – Driveway Access along W. Hill Road
  - Left Sight Distance – Adequate
  - Right Sight Distance – Adequate
  - Recommendation – N/A
- Roadway 6 – Driveway Access along W. Hill Road
  - Left Sight Distance – Adequate
  - Right Sight Distance – Adequate
  - Recommendation – N/A
- Roadway 7 – Driveway Access along W. Hill Road
  - Left Sight Distance – Restricted to 350 feet due to foliage and 686 feet due to a vertical crest.
  - Right Sight Distance – Restricted to 250 feet due to foliage and 664 feet due to a vertical sag.
  - Recommendation – N/A
- Roadway 8 – Driveway Access along W. Hill Road
  - Left Sight Distance – Restricted to 602 feet due to vertical crest.
  - Right Sight Distance - Restricted to 684 feet due to vertical sag.
  - Recommendation – N/A
- Roadway 9 – Driveway Access along W. Hill Road
  - Left Sight Distance – Restricted to 376 feet due to vertical crest.
  - Right Sight Distance - Restricted to 616 feet due to vertical sag.
  - Recommendation – N/A
- Roadway 10 – Driveway Access along Hobday Road
  - Left Sight Distance – Adequate
  - Right Sight Distance – Adequate

    - Recommendation – N/A
- Roadway 11 – Driveway Access along Horton Road
    - Left Sight Distance – Restricted to 597 feet due to a vertical crest.
    - Right Sight Distance – Restricted to 365 feet due to foliage and 579 feet due to vertical sag.
    - Recommendation – N/A
- Roadway 13 – Driveway Access along Pee Dee Road
    - Left Sight Distance – Restricted to 679 feet due to a vertical crest.
    - Right Sight Distance – Adequate
    - Recommendation – N/A
- Roadway 14 – Driveway Access along NY 78
    - Left Sight Distance – Restricted to 600 feet due to a vertical crest.
    - Right Sight Distance – Restricted to 735 feet due to a vertical crest.
    - Recommendation – N/A
- Roadway 15 – Driveway Access along Hubbard Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Restricted to 374 feet due to a horizontal curve.
    - Recommendation – N/A
- Roadway 16 – Driveway Access along Hubbard Road
    - Left Sight Distance – Adequate
    - Right Sight Distance - Restricted to 607 feet due to a vertical crest.
    - Recommendation – N/A
- Roadway 18 – Driveway Access along Horton Road
    - Left Sight Distance – Restricted to 320 feet due to foliage.
    - Right Sight Distance –Adequate.
    - Recommendation – Cut back brush to maintain adequate sight distance.
- Roadway 19 – Driveway Access along Horton Road
    - Left Sight Distance – Restricted to 685 feet due to a vertical crest.
    - Right Sight Distance – Restricted to 680 feet due to foliage.
    - Recommendation – N/A
- Roadway 21 – Driveway Access along Poplar Tree Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Adequate
    - Recommendation – N/A
- Roadway 22 – Driveway Access along Mote Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Adequate
    - Recommendation – N/A
- Roadway 23 – Driveway Access along Mote Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Adequate
    - Recommendation – N/A
- Roadway 24 – Driveway Access along NY 78
    - Left Sight Distance – Adequate
    - Right Sight Distance – Restricted to 334 feet due to a vertical crest.
    - Recommendation – N/A

- Roadway 28 – Driveway Access along NY 78
    - Left Sight Distance – Restricted to 538 feet due to a vertical crest and 263 feet due to foliage.
    - Right Sight Distance – Restricted to 405 feet due to foliage.
    - Recommendation – Cut back foliage to maintain adequate sight distance.
- Roadway 30 – Driveway Access along NY 78
    - Left Sight Distance – Adequate
    - Right Sight Distance – Restricted to 357 feet due to foliage.
    - Recommendation – Cut back foliage to maintain adequate sight distance.
- Roadway 31 – Driveway Access along Poplar Tree Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Adequate
    - Recommendation – N/A
- Roadway 32 – Driveway Access along Poplar Tree Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Adequate
    - Recommendation – N/A
- Substation Roadway – Driveway Access along Wolcott Road
    - Left Sight Distance – Adequate
    - Right Sight Distance – Adequate
    - Recommendation – N/A

As indicated, thirteen of the access roads will have sufficient sight distance once foliage and brush is cut back. There are thirteen locations where site distance is restricted in ways other than foliage or brush; a majority of these locations are restricted due to a vertical crest. Mitigation measures will be identified in AES's Traffic Control Plan. Where feasible, vegetation should be trimmed within the frontage. Where vegetation cannot be trimmed, or where utility poles or curvature of the road restrict sight distance, and the driveway cannot be relocated, permanent MUTCD-compliant warning signs and temporary work zone construction signs should be installed to heighten awareness of the proposed access and construction vehicle activity. Alternatively, flaggers should be considered to provide safe access to the sight during construction.

Several factors can affect the adequacy of site distance from driveways and thus the safety of drivers. Official roadway speed limits may not reflect actual vehicle speeds, which may be lower due to the physical condition of the roadway or horizontal or vertical geometry of the roadway. The adequacy analysis was conducted for a single-unit truck, while the primary users of the driveway intersections will be passenger cars or pick-up trucks. The roadways where the driveways are located are generally low-volume roads with limited conflicting vehicles. Vegetation impacts, where applicable, are often seasonal and do not reflect year-round conditions.

The dispersion of access points serves to eliminate concentrations of any construction-related traffic and further reduce the vehicular movements at the individual driveway access locations.

D. ANALYSIS, EVALUATION, AND CONCLUSIONS

Repowering the Wethersfield Windpark will have a de minimus effect on the number of vehicular trips on the adjacent roadways that are currently being generated to and from the properties within the Study Area. Based on the short duration of construction-generated traffic, and limited number of trips that the Repowered Facility will generate in the long term, we offer the following findings:

1. Construction of the Repowered Facility is anticipated to begin in the fourth quarter of 2026 (site preparation, then material and equipment delivery) and end 18 months later in late 2028 (container and equipment pick-up).

2. Construction of the Repowered Facility is expected to generate an average of 96 heavy vehicle trips per day during material and equipment delivery. During construction, the Repowered Facility is anticipated to generate an average of 120 passenger vehicle trips per day, mainly by installation workers. Construction is anticipated to last for 70 to 80 weeks.

3. Activities related to the construction are expected to generate a significant amount of cut or fill. The net earthwork will be approximately 165,850 cubic yards of cut.

4. Construction of the Repowered Facility may require at least 494 oversized load deliveries on a vehicle, as detailed in Tables 3 to 6, to transport the transformer, wind turbine blades, nacelles, hubs, cranes, and tower sections to the Facility Site. Oversized deliveries will approach the Facility Site on the designated access route, as indicated on Figure 16-1 in Appendix 16-A. Roadway improvements at intersections along the haul route are anticipated to accommodate the oversized delivery vehicles. Specific roadway improvements and mitigation measures will be included in AES's Traffic Control Plan.

5. During operation of the Repowered Facility, an average of four passenger vehicle trips per day are anticipated. One weekly water delivery truck is expected.

6. Daily construction-related truck traffic and O&M traffic are generally not expected to occur during the a.m. and p.m. peak traffic periods on the adjacent roadways.

7. Daily site-generated traffic is not anticipated to affect school bus operations for Letchworth Central School District, Pioneer Central School District, or the Warsaw Central School District due to the limited number of vehicles generated by the Facility Site during standard operations and maintenance. Construction-related traffic to and from the Facility Site is not anticipated to affect any school bus operations because of the limited impact the traffic will have on these low-volume roadways.

8. Driveway access to the various parcels has been designed to be located on lower volume roadways in the Study Area where possible. Twenty-six driveway locations are dispersed throughout the Facility Site to eliminate the concentration of vehicular movements at the individual access points. Sight distances for the proposed driveway access road designs have been identified for each parcel, and mitigation measures have been identified where sight distance appears inadequate.

9. No new traffic control devices will be required to accommodate the anticipated Facility Site traffic.

10. A total of 277 accidents occurred in the Study Area along the proposed haul routes during the three-year period from September 2021 through September 2024. Approximately 64% of the crashes involved a deer, a different type of animal, or a single vehicle running off the road.

11. A road use agreement with the Town of Eagle, Town of Wethersfield, NYSDOT and the Wyoming County may be negotiated as part of the road use permits for the Repowered Facility. Any necessary road use agreements will be obtained during the construction phase of the Repowered Facility. Such road use agreements will document the rights and obligations for road use and repair during the construction phase with the appropriate authority.

12. As proposed, construction-related traffic and Repowered Facility maintenance and operations are not anticipated to create adverse traffic related impacts on roadways within the Study Area.

E. ANALYSIS AND EVALUATION FOR NON-ROADWAY TRANSPORTATION SYSTEMS

1. The Repowered Facility is not anticipated to impact airports and airstrips, railroads, or subways, in the vicinity of the Study Area. A fixed-route transit system operates within the Study Area with twice-daily service, but impacts are expected to be minimal. The nearest aviation facilities are Keysa Airport, located in the Town of Arcade, approximately 2 miles west of the Facility Site, and Arcade Tri-County Airport, located in the Town of Arcade, approximately 7 miles west of the Facility Site. The distance of the Facility Site to the aviation facilities is not expected to require a Special Use Airspace designation from the Federal Aviation Administration. No impacts on airport and airstrip facilities are anticipated.

We trust that this Traffic Analysis Report letter conveys the anticipated impacts to the local roadway network. Please feel free to contact us if you have any questions or require any additional information.

Sincerely,
WSP USA, Inc.

Will Cowan, PTOE
Lead Transportation Engineer