

Hoffman Falls Wind Project

Matter No. 23-00038

Appendix 16-G

Response to NYSDOT Comments

Introduction

On February 15, 2024, Hoffman Falls Wind LLC (the Applicant) submitted an Application for a Siting Permit under Section 94-c of the New York State Executive Law to the Office of Renewable Energy Siting (ORES). On May 13, 2024, Hoffman Falls Wind LLC received comments from the New York State Department of Transportation (NYSDOT) regarding the Application. The comments from the NYSDOT are provided below, along with the Applicant's responses, which are in italics.

Exhibit 16 – Effect on Transportation

The information provided in Exhibit 16 does not contain sufficient detail for the Office to complete its review in compliance with 19 NYCRR §900-

1. As set forth in sections (a) and (d)(4) of Exhibit 16 and Sheet TC102 in Appendix 16-A, the Applicant's proposed traffic control plan and recommended mitigation measures do not adhere to NYSDOT'S Work Zone Traffic Control ("WZTC") Standard Specifications. Where the Applicant's construction or other activities in connection with the Project are within the purview of NYSDOT jurisdiction, the Applicant will need to comply with all applicable NYSDOT WZTC standards – including, but not limited to, Section 619 of NYSDOT's Standard Specifications and associated WZTC Standard sheets. The Department requests that the Applicant's work zone traffic control plan discussed in Exhibit 16 incorporate all applicable WZTC requirements in conformance with Section 619 of the NYSDOT Standard Specifications and provide that WZTCs associated with the Project will adhere to such specifications.

Response: The Applicant will submit a revised Traffic Control Plan prior to construction that demonstrates compliance with all applicable NYSDOT WZTC standards and specifications within areas of NYSDOT jurisdiction, in conformance with Section 619 of the NYSDOT Standard Specifications.

2. In Section (b)(4) of Exhibit 16, the Applicant acknowledges throughout the life of the Project, bridges along the proposed haul routes should be monitored for any unusual cracking or other noticeable changes and such observations should be immediately reported for further investigation. To address bridge monitoring along haul routes, the Department will require the Applicant to comply with any/all applicable bridge monitoring conditions incorporated into oversize/overweight special hauling permits issued in connection with the project. If cracking or other structural integrity issue(s) arise, the subject bridge would require closure until an inspection is performed and the structure approved by NYSDOT for reopening.

Response: The Applicant will comply with any/all applicable bridge monitoring conditions incorporated into oversize/overweight special hauling permits issued in connection with the Project. If cracking or other structural integrity issues arise, the subject bridge will be closed until an inspection is performed and the subject bridge is approved for reopening by the NYSDOT.

3. The Applicant's discussion of cut and fill activity in Section (c)(2) of Exhibit 16 does not address how the Project will prevent negative impacts to existing infrastructure that may result from the redirection or redistribution of drainage associated with Project construction activities. Pursuant to applicable Highway Work Permit conditions, NYSDOT may require that the Applicant submit pre-construction and post-construction drainage reports to the Department prior to the commencement of construction work. These standard requirements enable NYSDOT to assess potential impacts to existing State Highway infrastructure and the State Right-of-Way ("ROW"). The Department further requests that the Applicant identify measures it will employ to prevent potential negative drainage impacts to existing infrastructure and the State ROW that may result from the Project.

Response: In developing the final SWPPP, the Applicant will coordinate with the NYSDEC and NYSDOT, as needed, to ensure any potentially affected state ROWs are not impacted by the construction and operation of the Facility. If required by the NYSDOT, the Applicant will submit pre-construction and post-construction drainage reports to the Department.

4. In Section (d)(3) of Exhibit 16, the Applicant discusses over-sized deliveries and the need for roadway widening and/or vegetation clearing to accommodate such delivery vehicles. The Applicant acknowledges in its Exhibit 25 that it will require Special Hauling Permits for oversize/overweight vehicle deliveries and Highway Work Permits in connection with the Project. Depending on the location and nature of specific improvements or clearing sought by the Applicant, NYSDOT may need to notify and/or obtain approval from the Federal Highway Administration ("FHWA") before issuance of such Highway Work Permit(s). The Department requests that the Applicant provide in its Exhibit 16 a table of the nine (9) intersections along the Project's delivery route(s) that will require clearing and/or improvements- including, GPS coordinates and the specific vegetation clearing and/or roadway improvement proposed.

Response: Prior to construction, the Applicant will coordinate with the NYSDOT and FHWA, as needed, to identify the locations and extent of proposed clearing within State and US Highway Rights of Way, and provide any requested location information, as necessary, to obtain required highway work permits.

5. Regarding the Applicant's Sheet TC101 in Appendix 16-A, NYSDOT requests that the Applicant depict the full hauling route from I-90.

Response: The Applicant has revised Sheet TC101 in Appendix 16-A to show the full haul route from I-90.

6. Regarding Sheets SD.13 and SD.20 in Appendix 16-B, NYSDOT requests that the Applicant include Reference Marker locations for the depicted sections U.S. 20.

Response: The Applicant will provide a revised Sight Distance Analysis prior to construction that shows reference marker locations within the depicted sections of US Highway 20.

Exhibit 25 – Other Permits and Approvals

The information provided in Exhibit 25 does not contain sufficient detail for the Office to complete its review in compliance with 19 NYCRR §900-

7. In Section (b) of Exhibit 25, the Applicant anticipates requiring NYSDOT Use and Occupancy Permit(s) for installation of utility facilities and collection lines within the State Highway ROW. Highway Work Permits and Use and Occupancy Permits that implicate U.S. 20 may involve additional FHWA requirements and approval prior to issuance of NYSDOT permits. The Department requests that the Applicant include a map with GPS coordinates and sufficient detail depicting all transmission and distribution lines associated with the Project and specifying the location(s) of all proposed installations.

Response: No utility facilities or collection lines are proposed within State Highway ROWs. Exhibit 25 has been updated to reflect this.