BROOKSIDE SOLAR, LLC

Case No. 21-00927

900-2.17 Exhibit 16

Effect on Transportation

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Acronym List

AADT	Average Annual Daily Traffic
AASHTO	American Association of State Highway and Transportation Officials
AES	The AES Corporation, Inc.
ALIS	Accident Location Information System
ATV	All-Terrain Vehicle
BIN	bridge identification number
CFR	Code of Federal Regulations
DoD	Department of Defense
FAA	Federal Aviation Administration
FD	Follower Density
FHWA	Federal Highway Administration
FOIL	Freedom of Information Law
GSU	generator step-up unit
HCM	Highway Capacity Manual 6th edition
HCS	Highway Capacity Software
HDM	Highway Design Manual
hp	horsepower
ITE	Institute of Transportation Engineers
LOS	levels of service
mph	miles per hour
NCHRP	National Cooperative Highway Research Program
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
ORES	Office of Renewable Energy Siting
RUA	Road Use Agreement
SSD	Stopping Sight Distance
USCs	Uniform Standards and Conditions
v/c	volume to capacity ratio

Glossary Terms

Applicant	Brookside Solar, LLC, a subsidiary of The AES Corporation, Inc. (AES), the entity seeking a siting permit for the Facility from the Office of Renewable Energy Siting (ORES) under Section 94-c of the New York State Executive Law.
Facility	The proposed components to be constructed for the collection and distribution of energy for the Brookside Solar Project, which includes solar arrays, inverters, electric collection lines, and the collection substation.
Facility Site	The parcels encompassing Facility components, which totals 1,471 acres in the Towns of Burke and Chateaugay, Franklin County, New York (Figure 2-1).
Study Area	In accordance with the Section 94-c Regulations, the Study Area for the Facility includes a radius of five miles around the Facility Site boundary, unless otherwise noted for a specific resource study or Exhibit. The 5-mile Study Area encompasses 69,963 acres, inclusive of the 1,471-acre Facility Site.
Towns	The Towns of Burke and Chateaugay, Franklin County, New York.

Exhibit 16: Effect on Transportation

This Exhibit provides information required in accordance with the requirements of Section 900-2.17 of the Section 94-c Regulations.

16(a) Conceptual Site Plan

Facility Design Drawings, including the Conceptual Site Plans for the Facility, are included in Appendix 5-1 of Exhibit 5 (Design Drawings). The conceptual site plans, drawn at an appropriate scale, depict all Facility Site driveways and roadway intersections, showing:

(1) Horizontal and Vertical Geometry, Approach Lanes, Lane and Shoulder Widths, Traffic Control Devices, and Sight Distances

Details specific to Facility haul roads and driveway and roadway intersections showing horizontal and vertical geometry, number of approach lanes, lane widths, shoulder widths, and traffic control devices by approaches are included in Appendix 5-1. Intersection sight distances at the proposed haul roads are discussed below and additional information is included in Appendix 16-1 (Sight Distance Diagrams and American Association of State Highway and Transportation Officials [AASHTO] Tables). According to the requirements of the Section 94-c regulations, characterization of public road intersection suitability is required for facilities, which include wind turbines. The proposed Facility is a solar facility, and therefore, characterization of the public road intersection suitability outside the Facility Site is not applicable.

Sight distance diagrams were developed for the proposed haul roads at the entrances/exits for the Facility at the following locations illustrated in Appendix 16-1:

1. Stuart Road – northwest side, northeast of East Road;
2. Stuart Road – southeast side, southwest of Martin Road;
3. Stuart Road – northwest side, northeast of East Road;
4. Stuart Road – southeast side, northeast of East Road;
5. US-11 – north side, east of East Road;
6. Lewis Road – west side, north of Lewis Road;
7. US-11 – north side, east of Lewis Road;

8. CR-23 – west side, east of Ketcham Road;

9. CR-23 – west side, southwest of US-11; and

10. CR-23 – east side, southwest of US-11.

The recommended setback for the decision point is 14.5 feet from the edge of the roadway, plus half the distance to the required travel lane.

The New York State Department of Transportation (NYSDOT) Highway Design Manual (HDM) Chapter 5, Appendix 5C, Tables 5C-3 and 5C-4 recommend sight distances for left-turning vehicles and for right-turning vehicles for passenger cars and for combination trucks based upon the Design Speed. These recommended distances reduce significantly at lower speeds. These tables are shown below.

Table 16-1. Design Intersection Sight Distance for Left-Turning Vehicles

Table 5C-3 Design Intersection Sight Distance (in feet) - Case B1 - Left Turn From Stop

Design speed (mph)	Passenger Car Lanes Crossed			Single-Unit Truck Lanes Crossed			Combination Truck Lanes Crossed		
	1	2	3	1	2	3	1	2	3
15	170	180	190	210	225	245	255	270	285
20	225	240	250	280	300	325	340	360	380
25	280	295	315	350	375	405	425	450	475
30	335	355	375	420	450	485	510	540	570
35	390	415	440	490	525	565	595	630	665
40	445	475	500	560	600	645	680	720	760
45	500	530	565	630	675	725	765	810	855
50	555	590	625	700	750	805	850	900	950
55	610	650	690	770	825	885	930	990	1045
60	665	710	750	840	900	965	1015	1080	1140
65	720	765	815	910	975	1045	1100	1170	1235
70	775	825	875	980	1050	1125	1185	1260	1330

Table 16-2. Design Intersection Sight Distance for Right-Turning Vehicles

Table 5C-4 Design Intersection Sight Distance (in feet) - Case B2 - Right Turn From Stop and - Case B3 - Crossing Maneuver

Design Speed (mph)	Passenger Car Case B2-- Lane Entered Case B3 – Lanes Crossed			Single-Unit Truck Case B2-- Lane Entered Case B3 – Lanes Crossed			Combination Truck Case B2-- Lane Entered Case B3 – Lanes Crossed		
	1	2	3	1	2	3	1	2	3
15	145	155	170	190	205	220	235	250	265
20	195	210	225	250	275	295	310	330	350
25	240	260	280	315	340	365	390	415	440
30	290	310	335	375	410	440	465	495	525
35	335	365	390	440	475	510	545	580	615
40	385	415	445	500	545	585	620	660	700
45	430	465	500	565	610	655	695	745	790
50	480	515	555	625	680	730	775	825	875
55	530	570	610	690	745	805	850	910	965
60	575	620	665	750	815	875	930	990	1050
65	625	670	720	815	880	950	1005	1075	1140
70	670	725	775	875	950	1020	1085	1155	1225

Additional Sight Distance Tables from the AASHTO – A Policy on Geometric Design off Highways and Streets, Seventh Edition, 2018, which forms the basis for the NYSDOT Sight Distances referenced above are contained in Appendix 16-1. The AASHTO tables show the Stopping Sight Distances (SSDs), which are the minimum Sight Distances and are the required Sight Distances. It is noted that some of the sight distances were determined based upon photos and aerials. US-11 is 55 miles per hour (mph) but then reduces to 45 mph near the Chateaugay River and then in Chateaugay, reduces further to 30 mph, then increases to 45 mph and then back to 55 mph. In the vicinity of the Facility Site, there are limited posted speed limit signs and thus, the roads without speed limit signs were assumed to be 55 mph for Sight Distance purposes although it is unlikely that vehicles travel at that speed due to the roadway widths and curvature on some of the local roadways. The following are the standard SSDs as per AASHTO for level roadways, with the additional information contained in Appendix 16-1:

Design Speed: 30 mph SSD Design: 200 feet
Design Speed: 35 mph SSD Design: 250 feet
Design Speed: 40 mph SSD Design: 305 feet
Design Speed: 45 mph SSD Design: 360 feet
Design Speed: 50 mph SSD Design: 425 feet
Design Speed: 55 mph SSD Design: 495 feet

All SSDs and most Design Sight Distances will be met for each of the access points. Thus, the minimum required sight distances will be met for all conditions. There are some locations that may require trimming and/or removal of some vegetation to provide the proper sight distances. There are some locations where the roadway curvature somewhat limits the sight distance but there could be an increase in the sight distance by the trimming and/or clearance of some vegetation along the roadway. In addition, because of the height of the seated truck driver and the height of the trucks, truck drivers can generally see a farther distance and trucks can generally be seen at a farther distance, thus further increasing the available Sight Distance. If the driver pulls up closer to the road, the sight distance is improved. Signage could be added if deemed necessary and each location should be field checked prior to/during construction to determine if any signage is needed, vegetation is needed to be cleared, or if the driveway location should be slightly shifted, particularly at Driveway locations 1 and 2.

(2) Haul Road Locations and Widths and Road Intersection Suitability for Wind Facilities

The proposed Facility is a solar facility. Therefore, this section is not applicable.

16(b) Description of the Pre-construction Characteristics of Roads in the Vicinity of the Facility

As determined through pre-application consultations with Town representatives throughout quarters three and four of 2021, traffic within the vicinity of the Facility Site is generally minimal. The Applicant has discussed the pertinent road use information with the Towns. The Applicant intends to enter into Road Use Agreements (RUAs), which will address the Towns' concerns. Further detail regarding the pre-construction characteristics of the public roadways in the vicinity of the Facility, as determined pursuant to the pre-application meeting(s) required pursuant to section 900-1.3(a) of this Part have been included in the sections below.

(1) Traffic Volumes and Accident Data

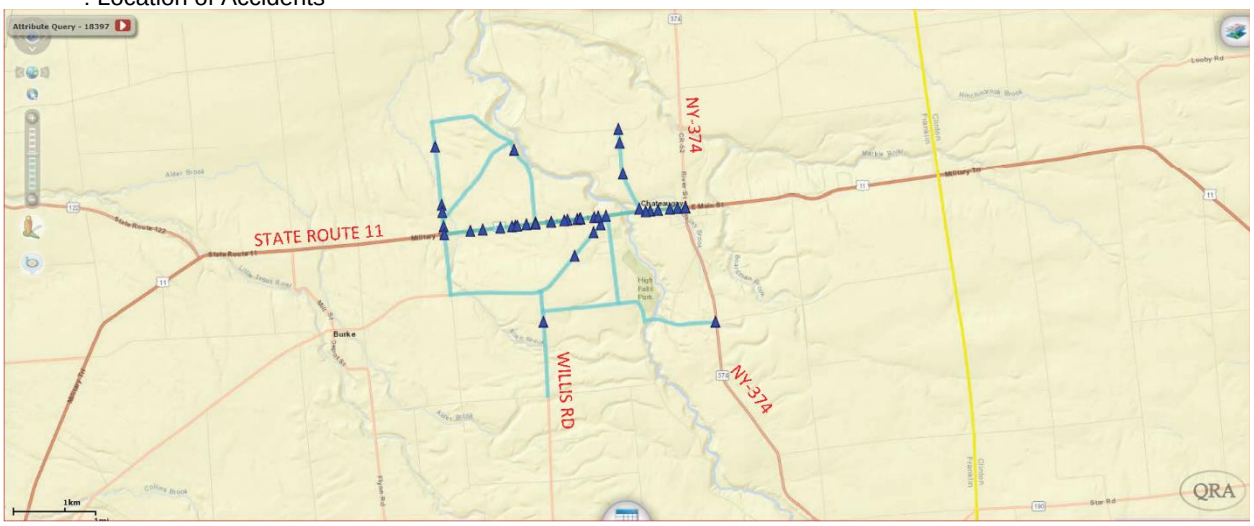
Existing traffic volume data along the proposed approach and departure routes for the Facility was obtained from the NYSDOT Traffic Data Viewer and NYSDOT Highway Data Services Bureau, where historical traffic count data is available online. Average Annual Daily Traffic

(AADT) volumes for roads within the Facility Site are provided by route in Appendix 16-2. Additional detailed information is also contained in Section 16(d)(2) below including vehicle traffic and use levels.

Existing accident data for the vicinity of the Facility Site was obtained from NYSDOT from the Accident Location Information System (ALIS) through a Freedom of Information Law (FOIL) Request. Accident data was obtained for segments in the vicinity of the Facility Site and the locations of the accidents are illustrated with blue triangles on Graphic 16-1 for a 3-year period from 2018 to 2020. The details of the accident data by case number are summarized in Appendix 16-3. During the 3-year period, there were a total of 43 accidents, with 19 accidents (44%) with another motor vehicles, 12 accidents (28%) involving a deer or other animal, 8 (19%) involving a fixed object, and the remaining were various other collisions. Of the 43 accidents, 32 (74%) accidents were listed as property damage only, 5 (12%) accidents involved some type of injury, and 5 (12%) accidents were non-reportable. There was also one fatal accident, which occurred at the intersection of US-11 and CR-23 in 2018 involving a collision of two vehicles.

Graphic 16-1. Facility Site Area Accident Maps

▲: Location of Accidents



(2) Transit Facilities and School Bus Routes

There are limited transit facilities in the area. Franklin County Public Transportation provides some public buses in the area (Appendix 16-4). These routes include a County Bus that travels through Chateaugay, Burke, Fort Covington, St. Regis Falls, Malone, and surrounding communities as well as another route for Saranac Lake, Tupper Lake, and Lake Placid. While transit vehicles and some construction-related vehicles may share some of the same roadways, any impacts to the local transit routes during construction are expected to be minimal. The Applicant will coordinate with the County to avoid any impacts and delays of routes throughout the construction process.

In addition to public transit routes, the Applicant also reviewed areas of school bus service in the vicinity of the Facility Site. School bus transportation information in the vicinity of the Facility Site was obtained from the Chateaugay Central School District and the Malone Central School District. Though road closures are not anticipated, should any local roadways need to be temporarily closed during construction for a short period of time, the contractor (or Applicant) will contact the appropriate local agencies to provide notifications including the School Districts who establish the school bus routes for their respective School Districts. Construction of the Facility is not expected to impact school bus stop locations, but in the event that any stops are impacted, the contractor (or Applicant) will provide safe accessible waiting areas. Along portions of US-11, there are “School Bus Stop Ahead” signs. During consultations in January 2022, the Chateaugay Central School District provided the current bus routes that will occur Monday

through Friday at 7:00 AM to 8:00 AM and 2:00 PM to 2:30 PM, as well as 3:30 PM to 4:30 PM on Tuesdays, Wednesdays, and Thursdays. They noted that bus routes are flexible and change depending on student population. Prior to construction, the Applicant will again consult with the school districts to minimize any potential impacts to school bus routes. Additional information regarding the school transportation and bus routes is contained in Appendix 16-4.

(3) Emergency Service Approach and Departure Routes

Emergency services, if necessary, would possibly be provided by various entities including but not limited to:

- Burke Volunteer Fire Department: 1041 E. Main Street, Burke, NY 12917;
- Chateaugay Fire Company: 2 Lake Street, Chateaugay, NY 12920;
- New York State Police Troop B: 3327 US-11, Malone, NY 12953; and
- Franklin County Emergency Services: 55 Bare Hill Road, Malone, NY 12953 (including Franklin County Sheriff's Office: 45 Bare Hill Road).

In the event of an emergency, the local emergency service providers will take the most direct or fastest available route to the Facility Site. The selected route will depend upon current conditions and starting locations, as their origin points may change due to other emergencies, whether a police vehicle is on patrol at the time, and the location of the incident within the Facility Site. Descriptions and illustrations of the routes to/from each of the above emergency service facilities are contained in Appendix 16-5.

The Applicant consulted with local emergency service providers, including the Towns' local fire departments, to inform them of the potential Facility, seek input regarding the Safety Response Plan, and answer questions (see Exhibit 6). The Applicant will continue to reach out and coordinate with the local emergency service providers throughout the development and construction process, so that they are aware of road closures (if necessary) that may impact their routing decisions. They will also be kept informed of expected Site work and the number of workers so they can plan accordingly. The Applicant and contractors will adhere to the Emergency Response Plan included in Appendix 6-1.

(4) Load Bearing Structural Rating Information

No bridges with weight restrictions that vehicles traveling to or from the Facility Site would use were identified in the Facility Site; however, the NYSDOT may issue weight and speed restrictions when weather conditions dictate.

Some bridges with weight restrictions in the surrounding area were identified however, any large construction traffic would verify the utilization of these routes. The identified posted bridge weight limits within the general surrounding area in the vicinity of the Facility Site were obtained from the NYSDOT. There are no State-Owned R-Posted (Non-Waivered) Bridges in the vicinity.

There is a Load Posted Bridge (bridge identification number [BIN] 2219730) of 20 tons along McCormick Road crossing Hinchin Brook in the Town of Chateaugay (rated “poor”), one (BIN 2259170) of 8 tons on the Park Maintenance Road crossing Lake Titus Stream in the Village of Malone, one (BIN 3336560) of 22 tons on Con Road crossing the north branch of the Great Chazy River in the Town of Altona, one (BIN 3336820) of 17 tons on Houndsville Road over Trout River in the Town of Malone, and one (BIN 337170) of 24 tons on Trippany Road over Little Salmon River in the Town of Brandon, one (BIN 3366740) of 10 tons on the New York State Department of Environmental Conservation (NYSDEC) Truck Road over Deer River in the Town of Brandon.

There is a bridge (BIN 2219560) closed on Sunset Road crossing Separator Brook in the Town of Dannemora, a bridge (BIN 2259160) closed on Fitzpatrick Road crossing Lake Titus Stream in the Town of Malone, a footbridge (BIN 3336610) over NBR Great Chazy River in the Town of Ellenburg, a bridge (BIN 3336779) closed on Labombard Road over NBR Great Chazy River in the Town of Ellenburg, a bridge (BIN 3336790) closed on McDermott Road over Salmon River in the Town of Malone, and a bridge (BIN 3337610) closed on Chase Hollow Road over Chateaugay River in the Town of Chateaugay.

The location and additional information of these bridges is contained in Appendix 16-6. None of these bridges, including the McCormick Road bridge identified above, are projected to be used during construction or operation of the Facility and none are in the immediate vicinity of the Facility Site. There was no available description of existing culverts in need of replacement or with a posting that would be impacted by the Facility, as discussed below.

Additional information on bridges including Posted Bridges and Non-Posted Bridges as well as culverts obtained from the NYSDOT is provided in Appendix 16-6.

Existing Culverts

The NYSDOT maintains an inventory of bridges and large culverts. The NYSDOT only load posts bridges and large culverts that have a span greater than 20 feet.

The following are the Bridge and Large Culvert Inspection Ratings Scales as per the NYSDOT Bridge and Large Culvert Inventory Manual and the NYSDOT Culvert Inventory and Inspection Manual/Culvert Field Instruction Guide:

- Inspection Rating Scale for Individual Culvert Items

  9 - Condition and/or existence unknown.

  8 - Not applicable. Used to rate an item the culvert does not have.

  7 - New condition. No deterioration.

  6 - Used to shade between ratings of 5 and 7.

  5 - Minor deterioration but functioning as originally designed.

  4 - Used to shade between ratings of 3 and 5. Functioning as originally designed.

  3 - Serious deterioration or not functioning as originally designed.

  2 - Used to shade between ratings of 1 and 3.

  1 - Totally deteriorated or in failed condition. Potentially hazardous.

- Inspection Rating Scale for Entire Culvert Structure

  7 - Like new condition. No repairs required.

  6 - May require very minor repairs to pavement, guiderail, shoulders, etc.

  5 - May require minor repairs to the headwalls or wingwalls. May require removal of light vegetation growth around culvert openings.

  4 - Pavement may require replacement with the addition of backfill material to correct minor roadway settlement problems, yet the structure shows no signs of deformation or settlement. Wingwalls and headwalls may require significant repair work. Some minor work to the channel may be required.

3 - Significant repairs to the pavement are required due to settlement. Slight deformation and settlement of the structure exists. Significant deterioration of wingwalls and/or headwalls exists. Extensive work on the culvert is required. Replacement could be considered a better long-term option.

2 - Replacement of the structure is necessary due to serious deformation and settlement of the structure. Short-term, remedial action such as pavement replacement or installation of additional backfill material is required. Temporary shoring may be needed or already exist. A vehicle load restriction is probably posted. Replacement of wingwalls and/or headwalls is required. Alignment of waterway is such that significant, measurable and progressive, general and/or localized scour is occurring. Constriction or obstruction of the culvert opening greatly restricts water flow.

1 - Pavement has settled as a result of significant structure deformation or settlement. Structure has collapsed or collapse is likely. Culvert opening is closed or nearly closed due to embankment soil failure, structure deformation, channel sedimentation, debris accumulation, or vegetation growth. Roadway should have traffic restrictions or be closed to traffic entirely.

Appendix 16-6 contains a map of the culverts along the State roads in the vicinity of the Site or on possible offsite haul routes for the Facility as provided by the NYSDOT. These roads are not necessarily intended to be used by the Facility traffic but are included for reference purposes. A State Culvert Attribute Table of the culverts referenced on the map, as provided by the NYSDOT, including the culvert identification number along with various information including but not limited to the year built, the feature crossed, the material type, the design type, the inspection date, the location, and the condition rating.

Based upon a preliminary review of the State culverts in the vicinity of the Facility Site, there are no culverts that NYSDOT has given a rating of 2 or lower, thus, no existing culverts along the construction or delivery routes were considered to be in poor condition requiring replacement at this time. Culvert C720124 along NY-374 (Lake Street) just south of US-11 in Chateaugay and Culvert C720044 along US-11 west of CR-29 in Burke are rated 3, thus repairs will be required in the future. Some construction employee traffic and construction vehicle could possibly travel over these culverts. Prior to construction of the Facility, discussions and coordination will be held with the NYSDOT regarding these culverts. If re-construction is to occur on either of the two culverts, it is likely that traffic will be maintained in both directions. Otherwise, the NYSDOT

would establish appropriate detours. Based upon information provided by the NYSDOT on January 13, 2022, Culvert C720044 US-11 over Alder Brook is tentatively scheduled to be slip-lined in 2022 or possibly in 2023. The NYSDOT has no plans for work on Culvert C720124 NY-374 over Bailey Brook.

The following is a list of the culverts identified along county roads in the vicinity of the Facility Site or on the portions of the roadways that are possible but not definite offsite haul routes to the Facility Site. The county road number along with the location and feature crossed are provided. A review of the available information did not indicate any posted culverts and there was no available information indicating any needed repair. Culvert locations along county routes are listed below.

A) CR-35: The following are the culvert locations along CR-35 between US-11 and NY-374:
   1) Crosses Bailey Brook 400 feet north of US-11; and
   2) Crosses Marble River 400 feet south of Summit Road.

B) CR-23: The following are the culvert locations along CR-23 between Finney Road US-11/Burke Road and US-11/Cemetery Road:
   1) Crosses Trout River 440 feet north of Donohue Road;
   2) Crosses Collins Brook 210 feet north of Stacy Road;
   3) Crosses Little Trout River 360 feet east of Finney Road;
   4) Crosses Alder Brook 1,200 feet west of Montgomery Road; and
   5) Crosses Allen Brook 1,100 feet east of Ketcham Road.

C) CR-36: The following is the culvert location along CR-36 between CR-33 and CR-23:
   1) Crosses Little Trout River 1,700 feet south of Cook Road.

16(c) Facility Trip Generation

Trip generation characteristics of the Facility during construction are estimated in the following sections.

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

To better understand how the construction of the Facility will potentially impact the adjacent roadway system, trips were generated for the Facility Site based on the peak construction workforce and construction equipment deliveries. Typically, these trips would be calculated

using the Institute of Transportation Engineers (ITE) Trip Generation Manual, where data from similar sites has been collected and aggregated to provide estimates for peak hour and daily site traffic volumes. However, there are no published trip generation rates for solar farm construction or similar type construction. The peak daily construction workforce for this Facility is expected to be between 78 and 117 workers which will be distributed to/from the Facility Site, conservatively assuming one worker per vehicle per day. In addition to construction workforce trips, construction equipment delivery trips were included in the traffic analysis for the construction period. Table 16-3 provides a detailed summary of the expected construction and Facility material delivery vehicles with a brief overview in the subsequent section. Load trips for the "Equipment and Installation" phase (69 trips) were added to the peak construction workforce to conservatively simulate the worst-case traffic operation scenario during the construction period.

During the operational phase of the Facility, only approximately 3.5 employees will be onsite periodically for vegetation management and routine Facility component maintenance. Heavy vehicles/equipment will not be traveling to and from the Site regularly. This workforce will not affect traffic around the Facility Site and will have no impacts on adjacent roadways.

The Applicant anticipates entering into RUAs with the Towns and County concerning repairs to any roads damaged by construction of the Facility. Agreements with these agencies will need to be reached in regard to the any weight restrictions or truck restrictions on certain roadways. Construction hours are to be limited to 7 a.m. to 8 p.m., Monday through Saturday, and 8:00 a.m. to 8 p.m. on Sunday and national holidays, with the exception of construction and delivery activities, which may occur during extended hours beyond this schedule on an as-needed basis. These timing restrictions shall 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 actual time of day and day of the week for the various construction equipment deliveries will be determined when the construction schedule is finalized.

Site Preparation and Grading Equipment

To be conservative, the capacity analyses contain a high percentage of trucks/equipment in the peak-hour calculations to ensure that there is no traffic impact, as illustrated in 16(d)(2) below. Most of the equipment described below will stay on the Facility Site for the days needed, and thus would not be going back and forth to the Facility Site each day.

Graders – It is expected that there will be two graders used for the Facility Site preparation and grading of the Facility. Each grader will have a 174-horsepower (hp) engine and have an approximate weight of 43,000 pounds (lbs.) per vehicle.

Rubber-Tired Loaders – It is expected that there will be two rubber-tired loaders in use. Each loader will have a bucket capacity of approximately 2.1 to 5.0 cubic meters and a 164-hp engine. The weight of the rubber-tired loader is approximately 31,000 lbs.

Scrapers – It is anticipated that there will be three scrapers used with approximately 313 hp each. The approximate operating weight is 80,000 lbs. for each scraper.

Water Trucks – It is expected that there will be two water trucks in use at the Facility Site. Each truck will be equipped with a 189-hp engine. Depending on the size of the tank, the average weight can be 50,000 lbs. to 75,000 lbs. For every 2,500 gallons of liquid, the average approximate weight will be an additional 25,000 lbs. over the weight of the vehicle carrying the tank, which can range from 17,000 lbs. to 25,000 lbs.

Generator Sets – Two generator sets will be delivered and used for the construction of the Facility.

Trenching and Road Construction Equipment

Excavators – Three excavators will be delivered and used for the construction of the Facility. It is approximated that each excavator will weigh roughly 50,000 lbs. The net power for the excavator will be approximately 168 hp.

Trencher – There will be four trenchers used at the Facility Site. These trenchers will have an operating power of approximately 63 hp and weigh approximately 8,000 lbs.

Equipment Installation

Crane – It is expected that a Lattice Crawler Crane will be used to construct the Facility. Typical transportation of these cranes requires disassembly and placement on a trailer. It is expected that the crane set up will require approximately seven trailer loads with the main transport load weighing approximately 80,000 lbs.

Forklifts – During construction of the Facility, eight forklifts will be used. The weight of each forklift is approximately 25,000 lbs. The hp of each forklift is approximately 145 hp.

Pile Drivers – It is estimated that ten pile drivers will be in use at the Facility Site. Each pile driver will have an approximate weight of 30,000 lbs.

Pickup Trucks/All-Terrain Vehicles (ATVs) – There will be approximately 45 pickup trucks and ATVs entering the Facility Site during construction. Each pickup truck will weigh approximately 3,000 lbs. and each ATV will weigh approximately 700 lbs.

Construction Equipment and Materials

Aggregate Trucks – Temporary and permanent haul roads will be constructed at the Facility Site to provide access from the existing roadways. The haul roads and temporary laydown yards will be constructed of approximately 18,020 cubic yards of gravel aggregate material while approximately 7,900 cubic yards will be used for the inverter pads and substation/switchyard pads, stormwater treatment and other uses. As the 18,020 cubic yards utilized for the haul roads and temporary laydown areas will then also be removed, this amount was considered twice in the truck calculations. A total of 1,178 large dump trucks with an approximate carrying capacity of 22 cubic yards and a weight of 80,000 lbs. will be used to deliver the materials to the Facility Site and 819 trucks will remove the materials from the Facility Site. Construction is expected to occur during the first 3 to 4 months, which equates to approximately 15 truck trips per day for delivery and 12 truck trips per day for removal.

Based on the preliminary cut and fill calculations performed in Exhibit 10 (Geology, Seismology and Soils), The fill will be derived from excavations associated with Facility construction. Excess material from excavations will be distributed across the disturbed areas and blended into existing topography to return each area to its approximate original condition. No soil is expected to be removed during construction.

Concrete Trucks – Concrete will be necessary for perimeter fencing, inverters, and substation foundations associated with the Facility. Approximately 220 cubic yards of concrete will be needed for fence posts and an additional 1,770 cubic yards of concrete for the yard slabs and foundation. Trucks with an approximate capacity of 8 cubic yards and a weight of 70,000 lbs. will be used to deliver the material to the Facility Site. These vehicles will be of legal size and weight, not exceeding 80,000-lb. load limits. Construction of the perimeter fencing and yard slabs and foundations is not expected during the peak construction period, but is expected to occur during the last couple of months of construction, and therefore, is not included in the traffic analysis but equates to approximately 6 truck trips per day.

Conventional Semi-Trailers – Semi-Trailers will be used to transport the solar array components and construction equipment to the Facility Site. These vehicles will be of legal size and weight, not exceeding 80,000-lb. load limits.

Special equipment components including substation/switchyard control rooms, substation poles, generator step-up unit (GSU), inverters, etc. will exceed the legal weight and/or size up to 200,000 lbs. Special hauling permits and/or RUAs along the Facility offsite haul routes will be obtained prior to delivery.

Based on the expected transportation methods and proposed construction work, Table 16-3 below, summarizes the expected number of loaded trips generated entering the Facility Site during the construction period.

Table 16-3. Expected Number of Loaded Entering Trips

Equipment/Activity	Construction Equipment	Trips Per Piece of Equipment
Site Preparation and Grading	Graders (174 hp)	2
	Rubber-Tired Loaders (164 hp)	2
	Scrapers (313 hp)	3
	Water Trucks (189 hp)	2
	Generator Sets	2
	Roller/Compactor	1
Trenching and Road Construction	Excavators (168 hp)	3
	Graders (174 hp)	3
	Water Trucks (189 hp)	2
	Trencher (63 hp)	4
	Rubber-Tired Loader (164 hp)	2
	Generator Sets	2
Equipment and Installation	Crane (399 hp)	1
	Crane (165 hp)	1
	Forklifts (145 hp)	8
	Pile Drivers	10
	Pickup Trucks/ATVs	45
	Water Trucks (189 hp)	2
	Generator Sets	2
Commissioning	Pickup Trucks/ATVs	5
Haul Roads (and other uses for crushed stone) [includes 819 exiting trips for removal]	Dump Trucks (22 yd^3)	1,997

Table 16-3. Expected Number of Loaded Entering Trips

Equipment/Activity	Construction Equipment	Trips Per Piece of Equipment
Fencing & Substation	Concrete Trucks	249

Earthwork activity, construction of haul roads, and fencing installation will not occur at the same time as the peak workforce and equipment installation construction period. Added trips for these activities are expected to be approximately 15 trips per day during the first 3 to 4 months and 18 trips per day during the final 2 months, which does not exceed the conservative peak workforce of 130 trips per day and equipment/installation phase of 69 trips. Therefore, dump trucks for earthwork/haul roads and concrete trucks for fencing were not factored into the traffic analysis, which only analyzed the peak construction traffic volumes.

(2) Cut-and-Fill Activity

As described above, the hours of construction are to be determined but are likely to be 7 a.m. to 8 p.m., Monday through Saturday, and 8 a.m. to 8 p.m. on Sunday and national holidays, with the exception of construction and delivery activities, which may occur during extended hours beyond this schedule on an as-needed basis. When the construction schedule is finalized, the actual time of day and day of the week will be determined for the delivery/removal of any cut and fill as will the delineation of approach and departure routes. The routes will likely be similar to those described in Section 16(c)(3) below. Trucks carrying any cut/fill would handle 22 cubic yards of material and weigh 80,000 lbs. To be conservative, the capacity analyses contain a high percentage of trucks/equipment in the peak-hour calculations to ensure that there is no traffic impact, as illustrated in 16(d)(2) below.

Estimates using the Design Drawings (Appendix 5-1) indicate the soil fill (not gravel) will be derived from excavations associated with Facility construction. Excess material from excavations will be distributed across the disturbed areas and blended into existing topography to return each area to its approximate original condition. As described above, approximately 25,920 cubic yards of gravel fill will be imported to the Facility Site for roads, inverter pads, and substation/switchyard pads. There will also be approximately 220 cubic yards of concrete for the fence posts and 1,770 cubic yards of concrete for the slabs and foundations. Please see Appendix 5-1 for the Design Drawings and Exhibit 10 for additional information on cut and fill activity.

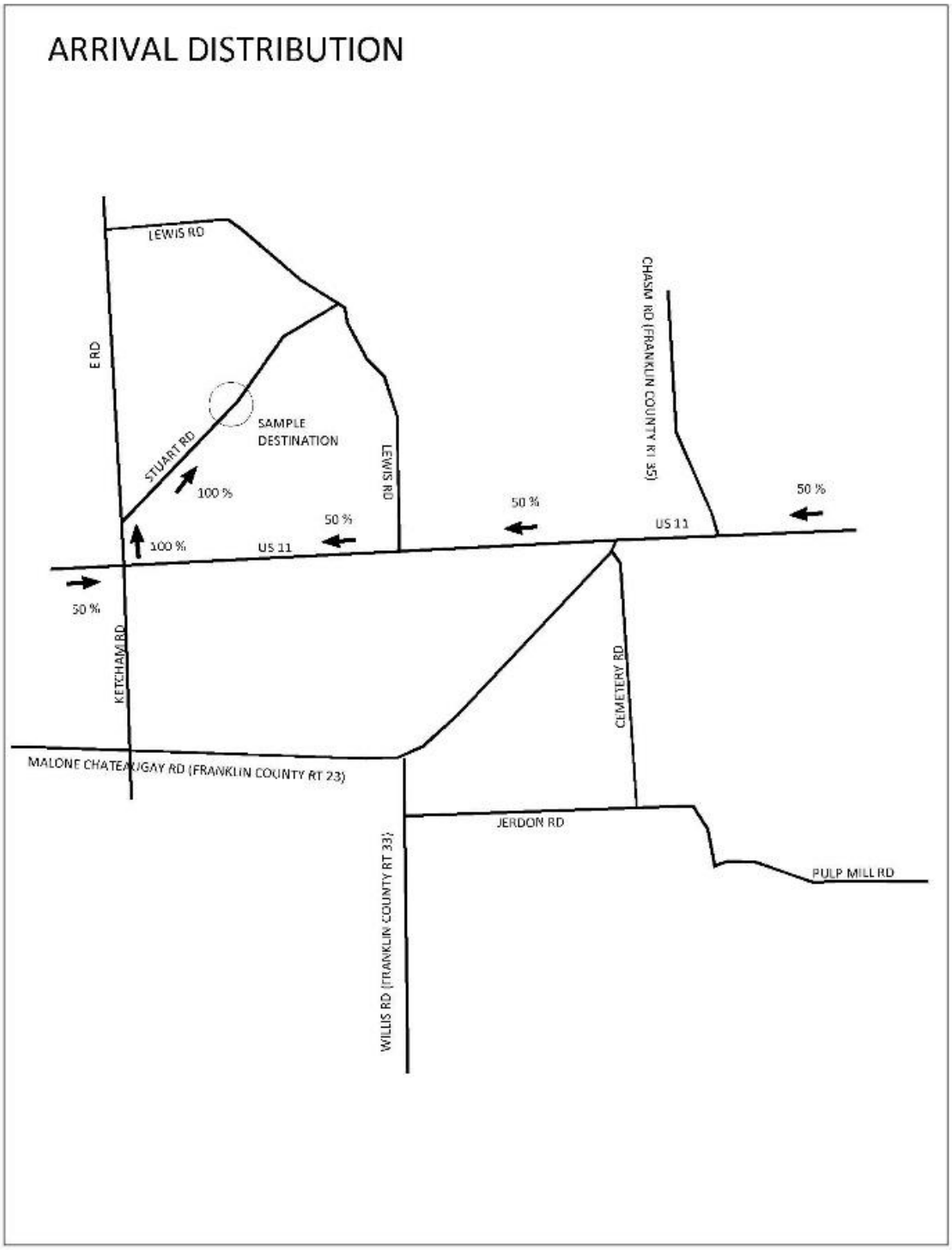
(3) Conceptual Employee Approach and Departure Routes

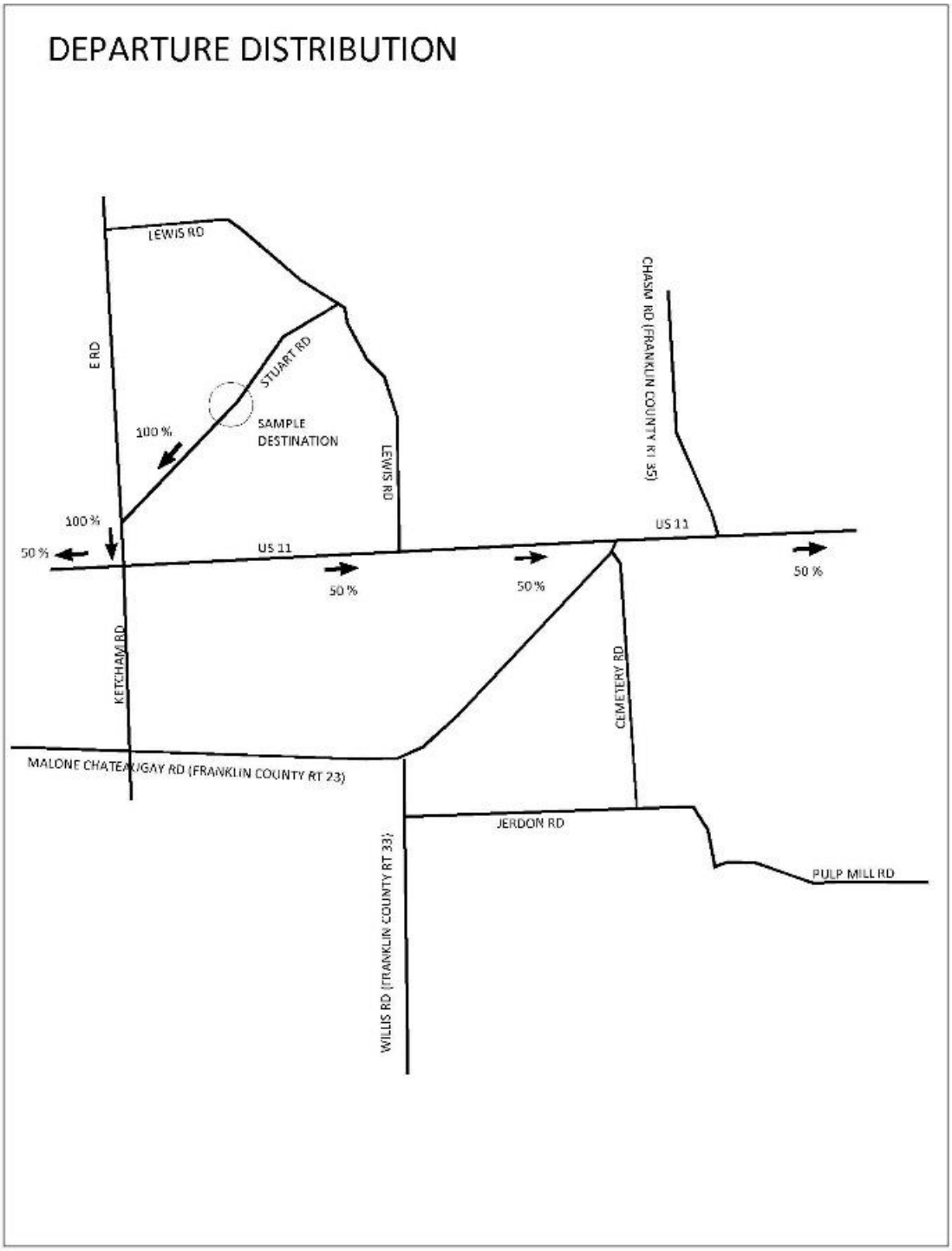
There are various regional routes to reach and depart from the Facility. In the vicinity of the Facility Site, there are different State routes including US-11, NY 190, NY-374, and NY 122. There are also different county routes including CR-23, CR-29, CR-33, and CR-35, as well as local roadways. The closest Interstate Highway in the vicinity of the Site is Interstate 87, located over 30 miles east of the Site.

Illustrations of preliminary potential key routes from major centers are contained in Appendix 16-7. These include details of the possible routes including turn-by-turn movements and account for other locations along the routes. For consistency purposes, all of the routes are shown to end at the intersection of US-11 and Lewis Road.

Graphic 16-2 below shows the estimated distribution percentages used in calculating construction worker trips and construction equipment deliveries to and from the Facility Site. There are other potential routes that some vehicles may take but the routes illustrated were used to be conservative in the Traffic Analyses.

Graphic 16-2. Facility Site Distribution Percentages




DEPARTURE DISTRIBUTION
LEWIS RD
E RD
STUART RD
SAMPLE
DESTINATION
100 %
LEWIS RD
CHASM RD (FRANKLIN COUNTY RT 35)
US 11
100 %
50 %
US 11
50 %
50 %
50 %
KETCHAM RD
CEMETERY RD
MALONE CHATEAUGAY RD (FRANKLIN COUNTY RT 23)
JERDON RD
PULP MILL RD
WILLIS RD (FRANKLIN COUNTY RT 33)

16(d) Traffic and Transportation Impacts

The traffic and transportation impacts of the Facility have been analyzed and evaluated, and are discussed below.

(1) Analysis of Future Traffic Conditions for Wind Facilities

The proposed Facility is a solar facility. Therefore, this section is not applicable.

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

Any potential traffic impacts will be short-term and primarily due to the temporary influx of personnel and investment during construction. Potential long-term effects to maintain and operate the solar farm are anticipated to be minimal. As mentioned previously in Section 16(c)(1), four employees will be onsite periodically for various management/maintenance work, which is significantly fewer trips than the peak construction period of approximately 199 additional trips; therefore, no impacts on future traffic conditions are anticipated as a result of the operation of the Facility. Details on frequency of employee visits to the Facility for operation and maintenance will be included in the Operations and Maintenance Plan, which will be submitted in a Compliance Filing prior to construction.

With the additional trips generated by the construction of the solar farm, the levels of service (LOS) are evaluated for both the existing traffic volumes and construction-level traffic volumes to express the performance of the existing roadway facilities. Identification of the anticipated delivery routes is described in 16(c)(3) above. As illustrated below, the extent and duration of traffic interferences during construction of the Facility and any interconnections will be minimal.

Existing Traffic Data

Existing traffic volume data was obtained from the NYSDOT Traffic Data Viewer and NYSDOT Highway Data Services Bureau, where historical traffic count data is available. AADT volumes are provided by route for some of the county and state routes in the area. Traffic count data was sporadically available for some of the local roads within the Facility Site. The table below summarizes the available traffic data within the Facility Site:

Table 16-4. Available Traffic Data within the Facility Site Area

Site No.	Route/ Road Name	From	To	AADT	Count Station	Count Year
A	Cemetery Road	Burke County Road	Jerdon Road	102	75_6219	2018
B	Chasm Road	US-11	CR-52	66	72_6138	2014
C	East Road	US-11	Trout River Road	251	72_6049	2014
D	CR-23 Malone-Chateaugay Road	US-11	Stacy Road	1048	72_6019	2015
E	Main St US-11/N	Route 122 Hawks Hollow	Route 374 Chateaugay	5492	72_0142	2016

Roadway Characteristics

Existing roadways within the Facility Site fall into the following functional classifications as defined by NYSDOT Office of Technical Services and Federal Highway Administration (FHWA).

Principal Arterial Interstate – There are no Principal Arterial Interstates located in the vicinity of the Facility Site. Principal Arterial Interstates are roadways classified as interstates that carry multiple travel lanes and are designated for high rates of speed between major points. Interstate I-87 is located more than 30 miles east of the Site.

Principal Arterial Other – The only Principal Arterial Other roadway found within the vicinity of the Facility Site is US-11. Principal Arterial Other roadways are classified as non-interstates that consist of a connected rural network of continuous routes that serve corridor movement having trip length and travel density characteristics indicative of substantial statewide or interstate travel and provide an integrated network without stub connections except where unusual geographic or traffic flow conditions dictate otherwise. US-11 is also signed as a Bike Route and has shoulders on each side.

Minor Arterial – There no Minor Arterial roadways classified by the NYSDOT in the vicinity of the Facility Site. Minor Arterials are often moderate length and usually provide a connection to a higher-level roadway, such as a Principal Arterial. In rural areas, such as the in the vicinity of the Facility Site, Minor Arterials provide high travel speeds with minimal disruption to the through traveling vehicles.

Major Collector – There are five Major Collector roadways within the vicinity of the Facility Site as classified by the NYSDOT. These are NYS-122, NYS-190, NYS 374, CR-52, and CR-124.

Major Collectors generally have few driveways and also allow for minimal disruption to the through traveling vehicles. Major Collectors can be shorter in length and have less daily traffic than Minor Arterials.

Minor Collector – The Minor Collector roadways within the vicinity of the Facility Site as classified by the NYSDOT are CR-23, CR-28, CR-33, CR-34, and CR-36. Minor Collectors generally are spaced at intervals to collect traffic from local roads and bring all developed areas within a reasonable distance of a collector road, while providing service to the remaining smaller communities and linking the locally important traffic generators with their rural areas.

Local Road – The rest of the roadways within the vicinity of the Facility Site are identified as Local Roads including East Road, Martin Road, Ketchan Road, Stuart Road, and Lewis Road. Local roads account for the largest percentage of total roadway miles. These roadways are short and are intended for specific local access. Local roads primarily facilitate direct access to adjacent property owners with many driveways and access points.

In addition to the classifications, most of the roadways within the Facility Site are generally rural in nature and generally provide one travel lane in each direction with limited shoulder and roadside treatments. The majority of the existing intersections are stop-controlled. There are limited signalized intersections in the area. The intersection of US-11 with NYS-374 is signalized.

Performance Methodology

Based on the functional classifications of the roadways in the Facility Site, roadway performance was analyzed by methods described in Chapter 12 and Chapter 15 of the Highway Capacity Manual 6th edition (HCM). Chapter 12 covers the guidance necessary for determining the performance of Multilane Highways, defined as highways with two or more lanes of travel in one direction. Chapter 15 of the HCM provides guidance for determining the performance of Two-Lane Highways, defined as roadways where passing maneuvers take place in the opposing lane of traffic and where segments are in excess of 2 miles from the nearest signalized intersection. Chapter 15 was recently amended by the National Cooperative Highway Research Program (NCHRP) and calculations for the LOS of two-lane highways were performed using the methodology from their findings.

Chapter 12 of the HCM states that multilane highways can be characterized by three performance measures. Each of the three measures are indicators of how well traffic is being accommodated by the multilane highway segment. The three measures are listed below:

- Density in passenger car per mile per lane,
- Space mean speed in miles per hour, and
- Ratio of demand flow rate to capacity (v/c).

Exhibit 12-15 from the HCM visually depicts the ranges of the density of the multilane highway that determines the LOS. This range is illustrated below in Table 16-5.

Table 16-5. LOS Criteria for Multilane Highway Segments

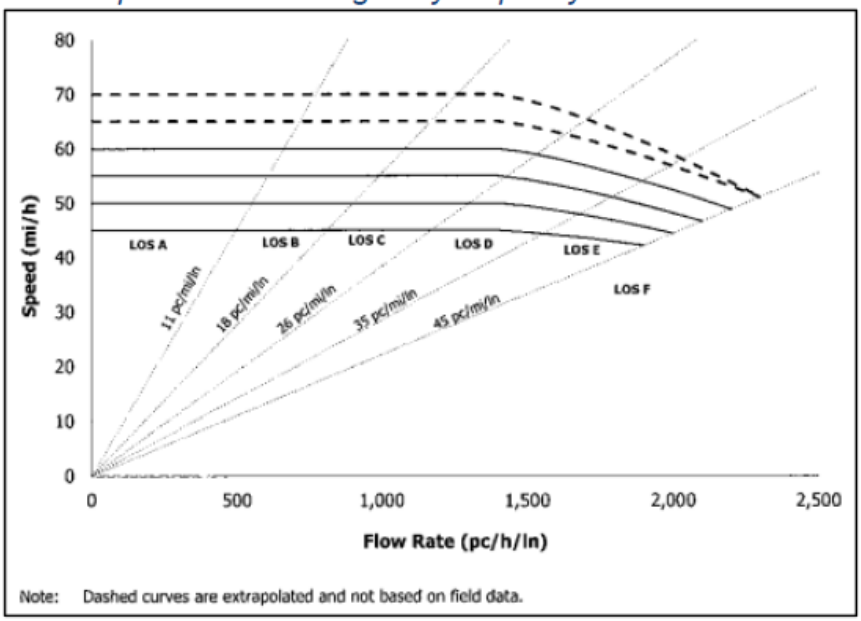
[Taken from Chapter 12 of the Highway Capacity Manual 6th Edition (HCM)]

LOS	Density (pc/mi/ln)
A	≤11
B	>11–18
C	>18–26
D	>26–35
E	>35–45
F	Demand exceeds capacity OR density > 45

Exhibit 12-17 from the HCM graphically represents the speed of the passenger car versus flow rate of the multilane highway segment. This Exhibit is illustrated in Graphic 16-3 below.

Graphic 16-3. LOS Criteria and Speed-Flow Curves for Multilane Highway Segments

[Taken from Chapter 12 of the Highway Capacity Manual 6th Edition (HCM)]



Two-lane highway LOS calculations were recently updated within Highway Capacity Software (HCS) 7 based on new studies performed by the NCHRP and published in the *"Improved Analysis of Two-Lane Highway Capacity and Operational Performance (2018)."* Calculating the LOS for a two-lane highway includes the analysis of the "Follower Density" (FD). FD is calculated by examining the percent follower in the analysis direction and multiplied by the ratio of the flow rate versus average speed in the analysis direction. This formula is illustrated below in Graphic 16-4. When calculated, the LOS can be determined by comparing the FD value received to the range of values for the LOS as seen in Table 16-6 below.

Graphic 16-4. Follower Density Equation

[Taken from "Improved Analysis of Two-Lane Highway Capacity and Operational Performance (2018)"]

Follower density, for use with Table F-35 is calculated as follows.

$$FD = \frac{PF}{100} \times \frac{v_d}{S} \quad \text{(F-25)}$$

where:

FD = follower density in the analysis direction (followers/mi),
PF = percent follower in the analysis direction,
v_d = flow rate in the analysis direction (veh/h), and
S = average speed in the analysis direction (mi/h).

Table 16-6. Follower Density Thresholds

[Taken from "Improved Analysis of Two-Lane Highway Capacity and Operational Performance (2018)"]

Table F-35. Follower Density Thresholds

LOS	Follower Density (followers/mi/ln)	
	High-Speed Highways Posted Speed Limit ≥ 50 mi/h	Low-Speed Highways Posted Speed Limit < 50 mi/h
A	≤ 2.0	≤ 2.5
B	> 2.0 – 4.0	> 2.5 – 5.0
C	> 4.0 – 8.0	> 5.0 – 10.0
D	> 8.0 – 12.0	> 10.0 – 15.0
E	> 12.0	> 15.0

Existing LOS

Based on the existing traffic volumes and existing roadway characteristics, the existing LOS was calculated. It was assumed that the design hour of the roadway accounts for 10% of the AADT and that the directional distribution is 60% of the combined two-way design hour volume.

As shown in Table 16-7 below, under base conditions all roadways within the Facility Site are currently operating as LOS B or better during the design hour, which indicates that there are no capacity problems.

Table 16-7. Existing Traffic Volumes & Characteristics for Two-Lane Highways

Site No.	Route/Road Name	Speed Limit (MI/HR)	Design Hour Volume (V/H)	Opposing Direction Volume (V/H)	Follower Density (FOLLOWERS/MI/LN)	LOS
A	Cemetery Road	45	13	13	0.0	A
B	Chasm Road	45	8	10	0.0	A
C	East Road	45	18	16	0.0	A
D	CR-23	45	51	31	0.1	A
E	US-11	55	319	319	2.1	B

Construction LOS

To evaluate the impacts that the construction of the solar Facility will have on the roadway system, roadways within the vicinity of the Facility Site were evaluated with the additional construction traffic, which was then compared to the existing roadway traffic capacity analysis. The previously developed 130 peak-hour construction worker trips and 69 equipment delivery trips were added to the existing design hour traffic volumes to develop the total traffic volumes during construction. The peak construction trips were combined with the roadway peak hours for analysis purposes to be conservative. Table 16-8 below summarizes the HCS outputs for two-lane highways. Refer to Appendix 16-8 for additional information on HCS outputs for two-lane highways.

Table 16-8. Traffic Volumes and Characteristics for Two-Lane Highways During Construction

Site No.	Route/Road Name	Speed Limit (MI/HR)	Design Hour Volume (V/H)	Opposing Direction Volume (V/H)	Follower Density (FOLLOWERS/MI/LN)	LOS
A	Cemetery Road	45	13	13	0.0	A
B	Chasm Road	45	8	10	0.0	A
C	East Road	45	239	237	1.9	A
D	CR-23	45	51	31	0.1	A
E	US-11	55	430	430	3.4	B

It is expected that all roadways will operate at LOS B or better within the vicinity of the Facility Site Area during the peak hour during the peak construction period. Additional construction-

related vehicles traveling the roadways will have little impact on the roadways due to the minimal existing demand. Future traffic analysis for the operating condition was not performed since that period is expected to have significantly fewer daily trips than the construction period. The construction period represents the absolute worst case in terms of total traffic volumes. Given that the construction period is not expected to have any traffic impacts, with LOS B or better at each segment analyzed, the future operations will function with equal or less traffic operational impacts than the construction period.

(3) Route Evaluation – Over-Size Load Deliveries and Roadway Restrictions

As mentioned at the beginning of this Exhibit, no bridge weight limits were identified within the vicinity of the Facility Site that construction vehicles would use. RUAs will be sought with the appropriate agencies, as necessary, to use local roadways. Turning template diagrams for trucks are contained in Appendix 16-9. The roadway system is adequate to accommodate oversize and overweight vehicles without additional mitigation. If a proposed oversize/overweight route is not feasible, then the condition and load rating of the roadway will be checked during the haul route evaluation. Should the review find reason for concern, the structure will be temporarily reinforced for the oversize/overweight component delivery or a different route will be utilized. No other improvements are necessary to accommodate oversize/overweight vehicles that will be used. No other improvements are necessary to accommodate oversize/overweight vehicles that will be used.

(4) Measures to Avoid or Minimize for Impacts to Traffic and Transportation and Road Use and Restoration Agreements

An identification and evaluation of practicable mitigation measures regarding traffic and transportation impacts, including time restrictions, the use of alternative technologies, the construction of physical roadway improvements, the installation of new traffic control devices, and the repair of local roads or other features due to damage by heavy equipment or construction activities during construction or operation of the Facility was performed and is summarized below.

Transit and School Busing – The Applicant will coordinate with the local school districts to avoid impacts and delays to bus routes throughout the construction process. Local school districts will be advised in advance of any road closures so that alternatives routes can be developed. It is

expected that overall impacts to the local school districts busing program will be minimal and no significant mitigation exceeding ongoing coordination is recommended. Similar coordination will be performed with the pertinent public transportation bus providers.

Emergency Response – The Applicant will coordinate with local emergency service providers throughout the construction process, so that they are aware of any sporadic road closures that may impact their routing decisions during the closure. They will also be kept informed of expected Site work and the number of workers so that emergency response can be planned for in advance. It is expected that overall impacts to the local emergency service providers will be minimal and no significant mitigation exceeding ongoing coordination is recommended.

Traffic Impacts – It is expected that all roadways will operate at LOS B or better within the vicinity of the Facility Site during the peak hour of the day. The results of the traffic analysis indicate that no new traffic control devices (such as road signage) are required and that there will be minimal impacts to the traveling public during the peak construction period and virtually no impact to the traveling public during off-peak periods. Thus, measures such as timing restrictions are not required. The Applicant will work with the Town to determine any necessary upgrades to Martin Road prior to the start of construction. No other capacity improvements or roadway upgrades are required to accommodate the construction of the proposed Facility. The Applicant anticipates entering into RUAs with the Towns and County concerning repairs to any roads damaged by construction of the Facility. Agreements with these agencies will need to be reached in regard to the any weight restrictions or truck restrictions on certain roadways. If any overweight/oversize permitting and road feasibility issues arise, RUAs and Restoration Agreements as well as the necessary Permits will be adhered to, as described below.

Road Use and Restoration Agreements – A copy of all road use and restoration agreements, if any, between the Applicant and the Towns and County regarding repair of local roads damaged by heavy equipment, construction or maintenance activities during construction and operation of the Facility will be provided as part of Traffic Control Plan submitted as a compliance filing (Section 900-10.2(e)(8)).

The Applicant anticipates that the large dimension and weight of several components (switchyard control rooms, substation poles, GSU, etc.) will require special hauling permits and/or RUAs along the Facility haul routes. The types of NYSDOT and County permits required depend on the characteristics of the vehicle and its cargo, number of trips, distance traveled,

and trip duration. NYSDOT defines oversize/overweight vehicles as those exceeding the dimensions provided in Table 16-8 below (e.g., overall, inclusive of load, bumpers, etc.).

Any vehicle exceeding 16 feet wide; 160 feet long; 15 feet ,11 inches high; or 199,999 lbs. will require a superload permit. The application/permit process can be performed online through the NYSDOT website. The fee structure for the superload permit is also published online and is cumulative based on load configuration and weight.

Table 16-9. NYSDOT Over-size/Over-weight Vehicle Dimensions

Item	Vehicle Dimension	State Highway	Qualifying or Access Highway
A.	Width of Vehicle, inclusive of load	8 feet	8 feet, 6 inches
B.	Height of vehicle from underside of tire to top of vehicle, inclusive of load	13 feet, 6 inches	13 feet, 6 inches
C.	Length of single vehicle inclusive of load and bumpers	40 feet	40 feet
D.	Length of a combination of vehicles inclusive of load and bumpers	65 feet	Unlimited
E.	Length of a single trailer	48 feet	53 feet
F.	Length of a single twin trailer	28 feet, 6 inches	28 feet, 6 inches

Prior to construction, the Applicant and/or contractor will obtain all necessary permits from the NYSDOT. RUAs with the Towns of Burke and Chateaugay and Franklin County will be sought, as applicable.

The Applicant is requesting in this Application delegation by ORES to NYSDOT for any required NYSDOT highway work/use/hauling permits. The Applicant plans to enter into easements, RUAs, or any other required approvals from the Towns of Burke and Chateaugay and Franklin County for the installation of collection lines, as applicable. The Applicant will discuss with the County any potential permitting for County rights-of-way.

In accordance with the anticipated RUAs, directly prior to construction, a survey of the local roadways used to access the Facility Site will be carried out by appropriately qualified engineers (and NYSDOT, County Highway, and Town Highway Departments, as available) to assess and document current existing road conditions as requested by the Towns or County. Any

extraordinary damage or over-run caused by vehicles during the construction period is to be documented and repaired to agreeable standards under a RUA with the relevant authority (State, County, or Town). The Applicant will repair damage done to roads affected by heavy equipment or construction activities thereby restoring the affected roads to a condition equal to or better than documented by the pre-construction survey. Roads will also be maintained in good working order during construction and operation.

16(e) Public Transportation, School Bus Routes, and Aeronautical and Military Operations

The Facility is designed to avoid and mitigate impacts to mass transit and aeronautical and military operations. Mass transit systems, aside from some bus routes, are limited within the Study Area; therefore, impacts are not anticipated, and mitigation measures will not be required.

As noted above, the Applicant will coordinate with local school districts and the public bus providers to avoid impacts and delays to bus routes throughout the construction process.

The Federal Aviation Administration (FAA) evaluates potential impacts on air navigation for proposed structures that exceed certain criteria, such as heights greater than 200 feet above ground level and in close proximity to public use and military airports (14 Code of Federal Regulations [CFR] Section 77.9(a-e)).

The proposed Facility will not require notification to the FAA. There were no airports or heliports identified within the Study Area. The closet small local airport is Malone-Dufort Airport adjacent to US-11 about 10 miles to the west in the Town of Malone. There are other small airports in Saranac Lake, Massena, and Plattsburgh, each over 30 miles away. There are no military airports near the Facility Site.

16(f) FAA Notice of Proposed Construction

As part of the construction of the Facility, no construction or alteration is proposed that requires a Notice of Proposed Construction to be submitted to the administrator of the FAA in accordance with 14 CFR Part 77.

(1) Statements of Review

An informal Department of Defense (DoD) review of the proposed Facility construction is not required in accordance with 32 CFR Section 211.7, and was not requested by the Applicant, since the FAA notice criteria are not exceeded (see Appendix 16-10).

(2) Wind Facility Location Requiring FAA Review

The proposed Facility is a solar facility. Therefore, this section is not applicable.

(3) Responses to FAA Facility Operator Reviews and Consultation

As previously stated, the FAA notice criteria are not exceeded by the proposed Facility and therefore, the Applicant did not initiate consultation with the FAA.

Conclusions

While there will be a temporary increase in traffic in the vicinity of the Facility during construction, that traffic will be short-term, and will mostly be due to commuting personnel. Most equipment will stay onsite for the duration of time in which it is needed, to reduce the amount of equipment transportation trips. The Applicant will enter into RUAs with the Towns and County concerning any necessary road repairs. There will be no traffic impacts during Facility operation. The Facility has been designed to comply with 19 New York Codes, Rules and Regulations (NYCRR) Section 900-2.17 and the Uniform Standards and Conditions (USCs), and impacts related to transportation have been avoided and minimized to the maximum extent practicable.

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