

# *Hounsfield Wind Farm*

## **Public Scoping Response to Comments September 2008**

### **2.0 Project Description**

#### **Comment 2-1:**

Anonymous – DEIS should contain a brief description of the regional power grid, physical interconnections, the power market, and anticipated impacts of this projects generating capacity on those markets.

*Response: The DEIS will generally describe these characteristics. However many of these subjects do not pertain to SEQRA and will be addressed in a more detailed analysis in the Public Service Commission's (PSC's) approval process pursuant to Public Service Law (PSL)§68 and Article VII.*

#### **Comment 2-2:**

Anonymous – DEIS should contain final determination of actual construction, operations and maintenance and decommissioning phase plans.

*Response: Consideration of operations and maintenance requirements, estimated construction tasks and decommissioning as required under SEQRA are included in this scope.*

#### **Comment 2-3:**

Anonymous – Description of regulatory authorities should include an explanation of the authorities of the Lead Agency and any cooperating agencies, applicability of Clean Water Act and PSC Article VII processes and how the DEIS effort will overlap and complement those authorities.

*Response: This was added to the scope, Section 2.6. This section will also discuss how the NEPA and SEQR processes will be coordinated, and how Section 106 historic preservation requirements will be met.*

#### **Comment 2-4:**

Anonymous – Engineering controls placed on fueling, lubrication, and greasing operations of mechanical equipment used on the wind farm and setback zones from sensitive receptor sites such as wetlands, shorelines, drainage courses, and other discharge routes to sensitive receiving waters.

*Response: This is covered in the Draft Stormwater Pollution Prevention Plan and the Sediment and Erosion Control Plan plans for the project, which will be included as appendices in the DEIS.*

**Comment 2-5:**

Anonymous – Engineering controls and setbacks for petroleum distillate storage, transfer and utilization facilities and for other chemicals or substances that may have negative ecological impacts due to accidental discharge.

*Response: This is covered in the Draft Stormwater Pollution Prevention Plan and the Sediment and Erosion Control Plan plans for the project, which will be included as appendices in the DEIS.*

**Comment 2-6**

PSC – Characterization of emissions reduction for any other fossil fuel generating facilities offset by output of the proposed project. Displacement of other renewable energy projects should be identified.

*Response: This was added to the scope.*

**2.5 Operation and Maintenance**

**Comment 2-7:**

PSC – Storage and use of any road melting materials. Use of sand should be explored.

*Response: This was added to the scope, Section 2.5.*

**Comment 2-8:**

Anonymous – Proposed plan for application of any pesticides and herbicides and the plan for noxious and invasive weed control.

*Response: This is included in this section of the scope and covered as part of the invasive species plan, which will be included as an appendix to the DEIS.*

**Comment 2-9:**

Anonymous – Effect of stormwater runoff washing pollutants from impervious surfaces and the plans for collecting and treating stormwater before discharge to sensitive receiving waters.

*Response: This is covered in the Draft Stormwater Pollution Prevention Plan and the Sediment and Erosion Control Plan plans for the project, which will be included as appendices in the DEIS.*

**Comment 2-10:**

Anonymous – A description of plans for removal of solid and liquid wastes, chemical wastes, and by-product wastes of operations such as rock crushing, maintenance facilities, and worker housing from project areas.

*Response: This is covered in the Draft Stormwater Pollution Prevention Plan and the Sediment and Erosion Control Plan plans for the project, which will be included as appendices in the DEIS.*

**Comment 2-11**

PSC – Details of any ice management strategies needed to maintain clear areas around dock or pierhead should be addressed.

*Response: This was added to the scope, in Section 2.5.*

**3.0 Resource Characterization, Impacts Assessment and Mitigation**

Summarized by Subsection below:

**3.1 Topography, Geology and Soils**

**Comment 3.1-1:**

PSC – Discuss the limitations and effects of topography, bedrock and soil on project layout, construction and restoration.

*Response: This was added to the scope.*

**Comment 3.1-2**

PSC – Disposition of bedrock excavated for construction should be addressed.

*Response: This was added to the scope.*

**Comment 3.1-3**

PSC – Areas of soil limitations, such as excessive wetness, and shallow depth to bedrock, should be mapped for use in facility siting and impact descriptions.

*Response: This was added to the scope.*

**Comment 3.1-4**

PSC – Underwater resources evaluation, including bedrock outcroppings, sediment type and depth, should be evaluated for siting and construction of pier and docking structures.

*Response: This was added to the scope.*

**Comment 3.1-5**

Anonymous – Water geophysical should be done along interconnect routes using side scan sonar and magnetometers.

*Response: The interconnection route is not covered in the SEQR process and will be addressed in the Article VII process.*

**Comment 3.1-6**

Anonymous – Vibracores should be taken along transmission line route, near shore, along ECS route and WTG foundations.

*Response: The interconnection route, transmission line and related issues are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process. Vibracores are taken in sediment or soils. However, bedrock is shallow on the island. It was already established that blasting will be required and that foundations will be on bedrock.*

**Comment 3.1-7**

Anonymous – Location of seismic fault lines, effects of seismic activity and the WTG seismic stability.

*Response: Because the island is vacant tower collapse is not a safety issue. However, we will look at the NYS Seismic Building Code Seismic Map.*

**Comment 3.1-8**

Anonymous – Sediment transport modeling of a range of current wave conditions.

*Response: The interconnection route, transmission line and related issues are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process*

**3.2 Land and Land Use**

**Comment 3.2-1**

Anonymous – A study of floodplain activity and impact of wind farm on 100 and 500 year flood events.

*Response: This was added to the scope.*

**3.3 Agricultural Resources**

**Comment 3.3-1**

PSC – Rock excavated for burial of electric collection lines in active agricultural fields should be removed and disposed of or reused.

*Response: This was added to the scope.*

### **3.4 Water Resources**

*Surface Water (SubSection 3.4.1)*

#### **Comment 3.4-1**

Anonymous – Studies of changes in water movements, sediment transport and shoreline erosions are suggested.

*Response: In comparison to the size of Lake Ontario the dock and slip channel will be a minor change. Therefore there is no reason to believe that this will change water movement, sediment transport or shoreline erosion to any significant degree.*

#### **Comment 3.4-2**

Anonymous – Water quality issues should include a discussion of the installation technique of the cable and the effect on water quality.

*Response: The interconnection route, transmission line and related issues are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process.*

#### **Comment 3.4-3**

USFWS – Provide information on expected need to dredge around docking facilities as well as expected boating activities associated with maintenance and inspection of the project facilities (number of trips to and from the island), and the associated impacts to water quality of these activities in Lake Ontario.

*Response: This was added to the scope.*

#### **Comment 3.4-4:**

PSC- Herbicide use is likely at the substation to control undergrowth. This should be considered in siting and resource protection.

*Response: This was added to the scope.*

#### **Comment 3.4-5**

Anonymous – Address navigation impacts for construction, operation, maintenance and decommissioning.

*Response: This was added to the scope.*

*Wetlands (Subsection 3.4.3)*

#### **Comment 3.4-5**

USFWS – Information for each wetland should be gathered to determine the functions and values of each wetland so that these can adequately be replaced by compensatory mitigation efforts.

*Response: This was added to the scope.*

**Comment 3.4-6**

USFWS – Physical survey of wetland boundaries should be done so that accurate impact assessments can be developed.

*Response: This was added to the scope.*

**Comment 3.4-7**

USFWS – Project sponsor should evaluate the potential for indirect impacts, such as changes in hydrology, fragmentation, isolation or habitat quality.

*Response: This was added to the scope.*

**3.5 Wildlife and Habitats**

**Comment 3.5-1**

PSC – Restoration plans should include planting native species to support natural ecosystem functions.

*Response: This was added to the scope.*

**Comment 3.5-2**

PSC – Vegetation management plans should be required for addressing long term maintenance of desirable ecological communities.

*Response: This was added to the scope.*

*Flora and Fauna (Subsection 3.5.1)*

**Comment 3.5-3**

PSC – The entire island should be included in habitat mapping and evaluation.

*Response: This was added to the scope.*

**Comment 3.5-4**

PSC – Analysis should include an assessment of fragmentation effects due to facilities siting, clearing and construction of turbine sites and linear roadways and ECS.

*Response: This was added to the scope.*

**Comment 3.5-5**

USFWS – Greater detail needed on scope of survey of plant and animal communities. Concerned the sampling intensity will be insufficient. Recommend that appropriate sampling, conducted with a scientifically rigorous protocol, be employed to gather data on species endemic to the island.

*Response: This was added to the scope.*

**Comment 3.5-6**

USFWS – Habitat fragmentation should be included in the scope. It is unclear if construction will result in habitat fragmentation. Should require information on large areas of contiguous habitat including assessment criteria and methodology to be used for impact assessment.

*Response: This was added to the scope.*

**Comment 3.5-7**

PSC – Substation alternatives should be identified to minimize habitat fragmentation.

*Response: This was added to the scope.*

*Rare, Threatened and Endangered Species (Subsection 3.5.2)*

**Comment 3.5-8**

PSC – Characterization should include identification of any species of concern in addition to rare, threatened and endangered species and supporting habitats.

*Response: This was added to the scope.*

**Comment 3.5-9**

USFWS – Mist netting is requested for the wind farm and transmission line. Any Indiana Bats should have a radio transmitter attached. (Human assessments of potential habitat (ie trying to identify each potential roost tree) have proven inadequate for several projects in the past. Simple cover type mapping to determine the acreage of potential habitat is all that is initially needed.

*Response: Mist netting is already proposed in the scope for the wind farm. The interconnection route, transmission line and related issues (including mist netting for the transmission line) are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process.*

**Comment 3.5-10**

USFWS – Phase I surveys for the federally- listed threatened bog turtle are needed for the transmission line portion of the project in Oswego County.

*Response: The interconnection route, transmission line and related issues are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process.*

*Avian Species (Subsection 3.5.3)*

**Comment 3.5-11**

Anonymous – Steps necessary to avoid raptor perch and nesting activities on structures near WTG should be considered.

*Response: Impacts to raptors is not determined yet. This was added to the scope for consideration as a potential mitigation.*

**Comment 3.5-12**

USFWS – Recommend information be collected from the Derby Hill Bird Observatory and local birding clubs (e.g., Onondaga Audubon Society.) Conservation groups such as The Nature Conservancy, Ducks Unlimited and others may have pertinent information.

*Response: This was added to the scope.*

**Comment 3.5-13**

USFWS – Recommend Wintering Bird Surveys be conducted again from November 2008 to March 2009 because available information indicates that Galloo Island and vicinity are important wintering areas for waterfowl.

*DEC notes that the work plan was reviewed and accepted for the first year of survey work. This does not preclude one or more additional years of avian and bat data from being collected for this project, or from modification of survey dates and methodology. DEC may recommend further study beyond year one of surveys.*

**Comment 3.5-14**

USFWS – Diurnal study – suggest that the number of individual birds and flocks of birds observed at each location be identified. Also recommend a rotating schedule of observation (crepuscular and midday for all locations).

*Response: This study is already underway.*

**Comment 3.5-15**

USFWS – Radar study recommend study dates from early March to late November. Also want multiple years of data.

*DEC notes that the work plan was reviewed and accepted for the first year of survey work. This does not preclude one or more additional years of avian and bat data from being collected for this project, or from modification of survey dates and methodology. DEC may recommend further study beyond year one of surveys.*

**Comment 3.5-16**

USFWS – Radar – Recommend whisker plots with median, 25<sup>th</sup> and 75<sup>th</sup> percentiles be provided for each hour for each survey night.

*Response: Whisker plots will be provided nightly*

**Comment 3.5-17**

USFWS – Radar – Not clear at what elevation wind data will be collected. Having this data at proposed turbine height and higher may indicate atmospheric conditions which influence avian flight patterns at this location.

*Response: This will be addressed in the DEIS.*

**Comment 3.5-18**

USFWS – Ceilometer observations – unclear if these observations are 5 minutes per hour or 5 minutes per night.

*Response: Based upon DEC Fish & Wildlife staff discussion with the project consultant conducting this study, these observations are being made 5 minutes per hour. Results reported in the DEIS will reflect this observation interval.*

**Comment 3.5-19**

USFWS – There is no mention of turbine operational adjustments in the avian or bat sections to mitigate potential collisions. Operational changes, such as adjustments to the turbine cut-in speed, feathering turbine blades, or seasonal restrictions, are not mentioned as potential mitigation measures. This should be added to the scope.

*Response: A section will be added to the DEIS discussing a proposed post-construction monitoring program that will be a required condition of DEC permits. The goal of a post-construction monitoring program is to measure actual mortality and displacement of birds and bats from operation of the project. Data provided by these studies will be compared against the pre-construction data collected to validate impact predictions. DEC requires post-construction monitoring because wind turbines are a relatively new component of the landscape and there are inherent difficulties in predicting the behavior of birds and bats in relation to this new landscape feature. If the level of impact found from post-construction monitoring exceeds that established by pre-construction analysis, DEC could seek measures to further reduce these effects. Such measures may include, but are not limited to feathering turbine blades or curtailing operation during certain nights or times of year when birds are found or suspected to be most susceptible to collision, or increasing cut-in speed during peak bat migration periods.*

**Comment 3.5-20**

USFWS – Were not contacted regarding placement of radar.

*Response: NYSDEC acknowledges this however the radar was sited near the geographic center of the island to cover the greatest amount of the island possible. NYSDEC assisted in selection of the location in consultation with Stantec avian radar experts.*

**Comment 3.5-21**

**PSC** – Mitigation should include a strategy to identify and implement adaptive management.

*Response: A section will be added to the DEIS discussing a proposed post-construction monitoring program that will be a required condition of DEC permits. The goal of a post-construction monitoring program is to measure actual mortality and displacement of birds and bats from operation of the project. Data provided by these studies will be compared against the pre-construction data collected to validate impact predictions. DEC requires post-construction monitoring because wind turbines are a relatively new component of the landscape and there are inherent difficulties in predicting the behavior of birds and bats in relation to this new landscape feature. If the level of impact found from post-construction monitoring exceeds that established by pre-construction analysis, DEC could seek measures to further reduce these effects. Such measures may include, but are not limited to feathering turbine blades or curtailing operation during certain nights or times of year when birds are found or suspected to be most susceptible to collision, or increasing cut-in speed during peak bat migration periods.*

**Comment 3.5-22**

**USFWS** – Have not received progress reports as indicated in the project schedule.

*Response: This is not part of the scope but as progress reports are provided they will be copied.*

**Comment 3.5-23**

**USFWS** – Have not been provided the proposed routes of the breeding bird surveys for the transmission line.

*Response: The interconnection route, transmission line and related issues are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process.*

**Comment 3.5-24**

**PSC** – Project lighting should be designed to avoid up-ward directed lighting.

*Response: This was added to the scope.*

*Fish (Subsection 3.5.5)*

**Comment 3.5-25**

**Anonymous** – A field study and survey should be done of individual and cumulative impacts on benthic and shellfish resources, finfish resources and commercial and recreational fisheries and protected marine species.

*Response: A study will be done for the Transmission Line and is not part of the SEQOR scope. An assessment of potential impacts from the dock approach will be conducted including a review of relevant sediment data, review of construction technique, review of geophysical survey that will assess submerged habitat type, and an assessment of construction impacts on habitat. This information will be supplemented with a review of existing literature for data regarding fish, benthic resources and fisheries.*

**Comment 3.5-26**

Anonymous – An essential fish habitat assessment should be considered including species type, life stage and abundance potential change to habitat types and sizes based on existing information.

*Response: This study will be done for the Transmission Line and is not part of the SEQOR scope, see responses above. However, impacts to fish will be evaluated in regard to the slip channel.*

**Comment 3.5-27**

Anonymous – Any conflict with fishery use or potential elimination due to structures proposed.

*Response: This was added in regard to the slip channel.*

**Comment 3.5-28**

Anonymous – Collection of benthic grab sampling along transmission route.

*Response: This study will be done for the Transmission Line and is not part of the SEQOR scope.*

**Comment 3.5-29**

Anonymous – Should address the interconnections between benthic, fisheries and avian resources.

*Response: The DEIS will evaluate the impact of the Project on these resources.*

**3.6 Visual**

**Comment 3.6-1**

PSC – Viewshed mapping should be based on a recent digital elevation model at max 10 meter interval.

*Response: The most recent publicly available USGS 7.5' Digital Elevation Models were used.*

**Comment 3.6-2**

PSC – ½ mile inland viewshed may not be appropriate. Must address visual and aesthetic resources and values as identified in NYS Coastal Zone Policies.

*Response: A section has been added to the scope to include discussion of Coastal Zone Management policies.*

**Comment 3.6-3**

PSC – 10 viewpoints may not be enough. Seaway trail may have more than one viewpoint with project visibility.

*Response: Viewpoints at water locations have been added to the visual assessment.*

**Comment 3.6-4**

Barone – Suggestion of documenting the island as a mitigation for any visual impacts.

*Response: This will be added as a mitigation activity.*

**Comment 3.6-5**

Maas - Restoration of lighthouse as a mitigation. Creation of a park on the island. Donation of temporary workers cottages to a state park for use. Creation of an interpretative center using community center following construction.

*Response: This was added as a mitigation alternative.*

**3.8 Socioeconomics**

**Comment 3.8-1**

Anonymous – Impact analysis on electricity rates and reliability in the region should be described.

*Response: This is not a SEQR issue and will not be addressed in detail.*

**Comment 3.8-2**

Anonymous – Explanation of any public funding and any applicable tax credits is requested.

*Response: This was added to the scope.*

**Comment 3.8-3**

Anonymous – Impacts on local property values and other fiscal impacts to local governments.

*Response: Due to the remote location potential impacts on property values is expected to be negligible, therefore this issue will not be added to the scope. Fiscal impacts to local governments is already included in the DEIS in Section 3.8.*

**Comment 3.8-4**

Anonymous – Impacts to local economy, including effects on employment, tourism, boating and fishing, commercial navigation tourism is requested.

*Response: This was added to the scope.*

**Comment 3.8-5**

Anonymous – Impacts on local recreational and commercial fishing requiring changes in gear, tactics and or location is requested.

*Response: This project will not affect any of these game fish issues.*

**Comment 3.8-6**

Anonymous – Discuss impacts compliance with Environmental Justice requirements.

*Response: DEC permits anticipated to be required in connection with this action do not fall under the agency's Environmental Justice (EJ) Policy. Additionally, the DEC GIS database shows that the closest mapped EJ area is 20 miles from Galloo Island. Therefore this discussion does not need to be added to the scope.*

**Comment 3.8-7**

Anonymous – Discuss new opportunities for local education and tourism based on green energy.

*Response: This was added to the scope.*

**3.9 Public Safety**

**Comment 3.9-1**

PSC – All facilities must meet applicable code requirements.

*Response: This was added to the scope.*

**Comment 3.9-2**

PSC – Worksite safety requirements should be addressed.

*Response: An emergency response plan will be included.*

**Comment 3.9-3**

PSC – Wind turbine, tower and blade testing and certification standards should be specified. Analysis of turbine reliability should be provided including accelerated lifetime testing results for appropriate components. (Required for PSC to make findings regarding safety)

*Response: The applicant will provide this data as separate correspondence to PSC.*

**Comment 3.9-4**

PSC – Substation site security measures should be addressed, including fence and gate specifications, lighting design and related details.

*Response: This was added to the scope.*

**Comment 3.9-5**

PSC – Lightning detection and protection system for wind turbine array should be specified.

*Response: This was added to the scope.*

**Comment 3.9-6**

Meeting – Port Security Plan

*Response: An evaluation of the St. Lawrence Seaway Corporation to establish their port procedures thru the Seaway will be done. These procedures will be presented in the DEIS and potential additional project specific requirements will be identified.*

**Comment 3.9-7**

Anonymous – A plan for emergency response to medical, fire, petroleum discharge, criminal acts and other incidents should be in the DEIS.

*Response: Medical and fire response plans will be included in the Emergency Response Plan that will be attached to the DEIS. Petroleum Discharge incidents will be handled as part of the SPCC plan. There is no practical concern for any other criminal acts on the island.*

**3.10 Microwave**

**Comment 3.10-1**

Anonymous – Make sure WTG does not interfere with point to point communication. Also verify no interference with cell phones, pagers and VHS radios.

*Response: A microwave study will be include, which will evaluated point to point communication. WTG are required to meet FCC requirements which ensure no interference with EMF standards which will ensure that cell phones pagers and VHS radios.*

### **3.13 FAA**

#### **Comment 3.13-1**

Anonymous – Plan for obtaining FAA concurrence that the towers will not interfere with air navigation, plans, radar interference, radio frequency as well as tower lighting plan.

*Response: Concurrence will not be available until notice of construction well after the EIS and Zoning approval.*

### **3.14 Noise**

#### **Comment 3.14-1**

Johnson -Noise Study for impacts to Town of Lyme.

*Response: Due to the distance of the island from sensitive receptors of at least 8 miles, the noise impacts would be negligible, therefore, no study is warranted.*

#### **Comment 3.14-2**

Anonymous – Potential impacts from underwater noise to marine and mammals and avian.

*Response: Due to the distance of the island from sensitive receptors, no study is warranted. In the section addressing Fish, potential impacts from the noise of blasting is being assessed.*

#### **Comment 3.14-3**

Anonymous- Noise impacts to sensitive receptors

*Response: Due to the distance of the island from sensitive receptors, no study is warranted.*

### **4.0 Alternatives**

#### **Comment 4.0-1**

PSC – Alternatives should address any alternative turbines under consideration by developer. Turbine operating characteristics, safety features and certifications vary by make and model.

*Response: This was added to the scope.*

**Comment 4.0-2**

Anonymous – Alternatives should include reasonable locations, alternative cable routes and grid interconnection points, as well as other alternatives which were eliminated for the study and a discussion of why they were eliminated.

*Response: The interconnection route, transmission line and related issues are exempt from SEQRA review and therefore will not be covered in the SEQR process. These issues will be addressed in the PSL Article VII process.*

**Comment 4.0-3**

Anonymous – Alternatives should include alternative technologies including solar, biomass and hydroelectric.

*Response: Alternative technologies are not compatible with the objectives and capabilities of the Project sponsor and therefore outside the scope of SEQR.*

**Comment 4.0-4**

Anonymous - No action may be either an alternative not involving lead agency jurisdiction or denial of permits.

*Response: This is not possible due to Town zoning. The denial of permits is noted.*

**Comment 4.0-5**

Anonymous – Onsite modification of or siting of individual structures within, the final sites should be discussed as minimization of impacts after final site and cable route selections.

*Response: This comment is unclear.*

**Comment 4.0-6**

PSC – Ecologic linkages between identified habitat resources should be identified and potential alternative layouts evaluated.

*Response: This was added to the scope.*

**6.0 Cumulative Impacts**

**Comment 6.0-1**

PSC – Cumulative visual impacts of the listed projects (Roaring Brook and Maple Ridge) on the linear Seaway Trail Scenic Byway. Identification of visible areas and relative exposure levels, published travel counts and a discussion of qualitative viewer experience should be developed.

*Response: This was added to the scope.*

**Comment 6.0-2**

**PSC** – Cumulative effects due to siting and construction of related transmission facilities should be addressed.

*Response: This was in the scope and will be addressed.*

**New Topics**

**Coastal Zone Assessment**

**Comment NT-1**

**PSC** – must include an assessment of Project consistency with Coastal Zone Management Policies and identify Significant Coastal Habitats, visual resources, and other specific components of the CZM Program. Any measures and policies identified in LWRP or Development Plans in the project study area, including Sackets Harbor, should be addressed specifically.

*Response: A Draft Coastal Zone Management Consistency Form will be included as an appendix to the DEIS.*

**Air Quality**

**Comment NT-2**

**PSC** – An air quality impact statement should be proposed to include construction and operation of project.

*Response: A new section in the DEIS will be included to determine if proposed construction activities meet thresholds under 6 NYCRR 201-3 as exempt or trivial activities. If it is determined that activities are not exempt or trivial, a DEC air permit will be required. See DEC website at: <http://www.dec.ny.gov/regs/4303.html>.*

**Comment NT-3**

**PSC** – Emissions of temporary operation of site or station power for construction phase should be characterized; diesel generators may be necessary.

*Response: A new section in the DEIS will be included to determine if proposed construction activities meet thresholds under 6 NYCRR 201-3 as exempt or trivial activities. If it is determined that activities are not exempt or trivial, a DEC air permit will be required. See DEC website at: <http://www.dec.ny.gov/regs/4303.html>.*

**Comment NT-4**

PSC – Provide studies that model the impact of the project on the transmission and generation in the area operating at full output. A report discussing the impacts on the transmission and sub-transmission systems should be provided, indicating how those impacts can be mitigated.

*Response: The PSC will be looking for this in the §68 application. We believe this is outside the SEQOR process and is a SEQRA exempt transmission issue which we will address in the sec 68 and Art VII process*

**EMF**

**Comment NT-5**

Anonymous – A study is needed of potential human health impacts of exposure to 60 Hz from WTG and transmission lines.

*Response: An EMF study is not necessary for the project as there are no private residences on the island. The transmission line will be included in the Article VII application.*

**Article VII Applicability**

**Comment NT-6**

PSC - Attachment of the Article VII environmental analysis, combined with a summary statement of transmission facilities environmental impact and assessment of the cumulative effects of the Project and transmission facilities (including substation) will be appropriate for the EIS.

*Response: This is not a comment on the scope, however this will be done.*

**Setbacks**

**Comment NT-7**

PSC - Setback of 1.5 tip height from major transmission facilities of 115 kV or higher.

*Response: This is not a comment on the scope.*

**Other**

**Comment NT-8**

Anonymous – Develop a plan for how scoping comments will be included in Article VII proceedings.

*Response: The Article VII application is a separate process. The commenter will have numerous opportunities to comment on the Article VII application.*

**Comment NT-9**

Anonymous – Studies on terrestrial ecology, terrestrial wildlife, turtles, and protected species, avian resources, shoreline and freshwater wetland resources, water quality, air quality, aesthetics, cultural and recreational resources and visual studies, noise and noise abatement plans for both above and below water environments, noise and sound impact analysis, impacts of transportation and navigation, impacts from resulting electrical and electromagnetic fields from proposed electrical generation and transmission facilities, impacts of telecommunications systems, air and climate impacts, socioeconomic impacts.

*Response: These will be covered in various other topics.*

**Comment NT-10**

Anonymous – Should describe existing resources of the final alternative sites in terms of physical hydrology and geology; wildlife, avian, shellfish, finfish, and benthic habitat; aesthetics, viewsheds, cultural resources, seismic activity zones, socioeconomics, regional power market conditions, water and air quality. Human uses such as hiking, touring, bicycling, and fishing should be described.

*Response: Due to the nature of the site as an individual island, no alternative sites are under consideration.*

**Comment NT-11**

Anonymous – Impacts from new road construction.

*Response: This already included in the scope.*

**Comment NT-12**

Whepley - What mitigation measures will be in place to control invasive species from leaving the island?

*Response: This was added to the scope.*

**Comment NT-13**

Whepley - The Town Board should hold any decommissioning bond.

*Response: This was added to the scope.*

**Comment NT-14**

Town Board would like input on:

- Project Layouts
- Project Typicals
- Blasting Plan
- Sediment and Erosion Control Plan
- Environmental Monitoring Plan
- Emergency Response Plan

- Decommissioning Plan
- Draft SWPPP
- Draft SPDES
- Invasive Species Control Plan

*Response: This is not a comment on the scope but will be done.*