

## COMMUNITY ENERGY – JORDANVILLE WIND NYSDPS COMMENTS ON PROPOSED D.E.I.S. SCOPE

January 19, 2006

The DPS letter of January 4, 2006 regarding the Lead Agency Request of the Town of Warren identified several resource categories and impact assessments which were recommended for inclusion in studies for project impact assessment. While some of those comments appear to be included in the draft scoping document, there are several matters which should be included in the final scope of studies.

**Soils limitations on engineering:** steep slopes, areas with shallow depth to groundwater and seasonally wet soils and (such as the substation interconnection site) may affect site selection and facility design alternatives for permanent installations. Soils limitations for access road locations and transmission interconnection design on steep slopes and erodible soils may warrant evaluation of alternative locations. Any potential limitations posed by karst formations should be carefully considered in siting. Analysis for major facilities and substation siting should be based on site-specific information and not rely on county level soil survey information.

**Erosion effects on water resources and aquatic habitat:** erosion impact assessment and control plans need to address temporary construction effects and permanent installations on erodible sites. Stormwater drainage from the transmission interconnection, substation and access road should be carefully evaluated for runoff potential to protected streams.

**Traffic, Transportation and Construction traffic:** hauling of over-size facility equipment and components should be assessed for haul routes to the project sites from major transportation corridors expected to be used for equipment delivery. The draft scope appears to be limited to the local project study area, and should be expanded as appropriate to address contingencies outside the project study area. Plans should consider highway limitations, planned work schedules for State highway routes, and potential effects of improvements to roads needed to support component deliveries. Road widening, utility re-locations, bridge reinforcement and similar effects may be associated with equipment delivery.

**Aesthetic and Visual Resources:** The 5 mile visual study area radius should be expanded as appropriate to include important resource areas: project visibility and impact on areas including Otsego Lake and the Glimmerglass Historic District, and the proposed Route 20 Scenic Byway should be addressed, and impact avoidance strategies identified.

Viewpoint selection criteria should address a range of settings, including historic resources in their landscape settings, and public vantage points.

Lighting design for permanent facilities, including substation and O&M building, should include task lighting as appropriate, and implement controls to avoid glare, off-site lighting scatter, and upward directed lighting.

Effects of project visibility and scale should be considered in the context of a community character evaluation for the study area.