STATE ENVIRONMENTAL QUALITY REVIEW ACT (SEQRA)
FINAL ENVIRONMENTAL IMPACT STATEMENT
P&M Offshore Wind Infrastructure (POWI) Project
Town of Coeymans, Albany County, New York

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Abbreviation	Definition/Denotation
ATL	Atlantic Testing Laboratories
Biers	W.M. Biers Property
C&D	Construction and Demolition
CIP	Coeymans Industrial Park
CRC	Coeymans Recycling Company
CY	Cubic Yards
DEIS	Draft Environmental Impact Study
EFH	Essential Fish Habitat
ENB	Environmental Notice Bulletin
EPA	Environmental Protection Agency
FEAF	Full Environmental Assessment Form
FEIS	Final Environmental Impact Study
GBS	Gravity Based Structure
GPD	Gallons per Day
LafargeHolcim	Lands of Atlantic Cement
MLW	Mean Low Water
MW	Megawatt
MSGP	Multi-Sector General Permit
NYS	New York State
NYSERDA	New York State Energy Research and Development Authority
NYSDEC	New York State Department of Environmental Conservation
NYSDOT	New York State Department of Transportation
OPRHP	New York State Office of Parks, Recreation, and Historic Properties
OSW	Offshore Wind
PCB	Polychlorinated Biphenyls
PM_{10} / $PM_{2.5}$	Particulate Matter 10 / Particulate Matter 2.5
POC	Port of Coeymans
POWI	P&M Offshore Wind Infrastructure Project
PSC	Public Service Commission
ROW	Right-of-Way
SEQR	State Environmental Quality Review
SF	Square Feet
SPDES	State Pollutant Discharge Elimination System
SWPPP	Stormwater Pollution Prevention Plan
TIAS	Traffic Impact and Access Study
TZC	Tappan-Zee Constructors
USACE	United States Army Corps of Engineers
USCG	United States Coast Guard

1.0 INTRODUCTION

1.1 Proposed Action

The P&M Offshore Wind Infrastructure (POWI) Project involves site and infrastructure improvements (upland and waterway) at the existing Port of Coeymans (POC) site to service the offshore wind industry supply chain. Site improvements include excavation and grading to create fabrication, assembly, and storage pads across the site; and the installation of a new wharf and dredging to create a deepwater port. Infrastructure improvements include a new 400-foot-long by 70-foot-wide concrete wharf; breasting dolphins; removal of existing trestle structures; and approximately 230,800 square feet of dredging with approximately 156,000 cubic yards (CY) of fill to be removed from the Hudson River. The deep-water port will be a 5.30 acre area that will be dredged to a depth of 34 feet at Mean Low Water to provide the necessary depth for vessels to transport offshore wind (OSW) components. To maintain the deep-water port long-term, it will be periodically dredged (approximately once every 5 years).

1.2 Location

The POWI project is located at the existing POC site at 2170 River Road, Town of Coeymans, Albany County, New York. The POC site is east of the NYS Thruway and NYS Route 144 and is adjacent to the west side of the Hudson River, at Hudson River Mile 134. The POC site is identified by the tax map ID # 156.-4-8.1 and is currently zoned Industrial. It is adjoined to the north by Lands of Atlantic Cement (LafargeHolcim), to the south by the Ravena-Coeymans Yacht Club, to the east by the Hudson River and to the west by NYS Route 144, the Coeymans Industrial Park (CIP) and the Lands of William M. Biers (Biers). A map of nearby uses is provided below in Figure 1.

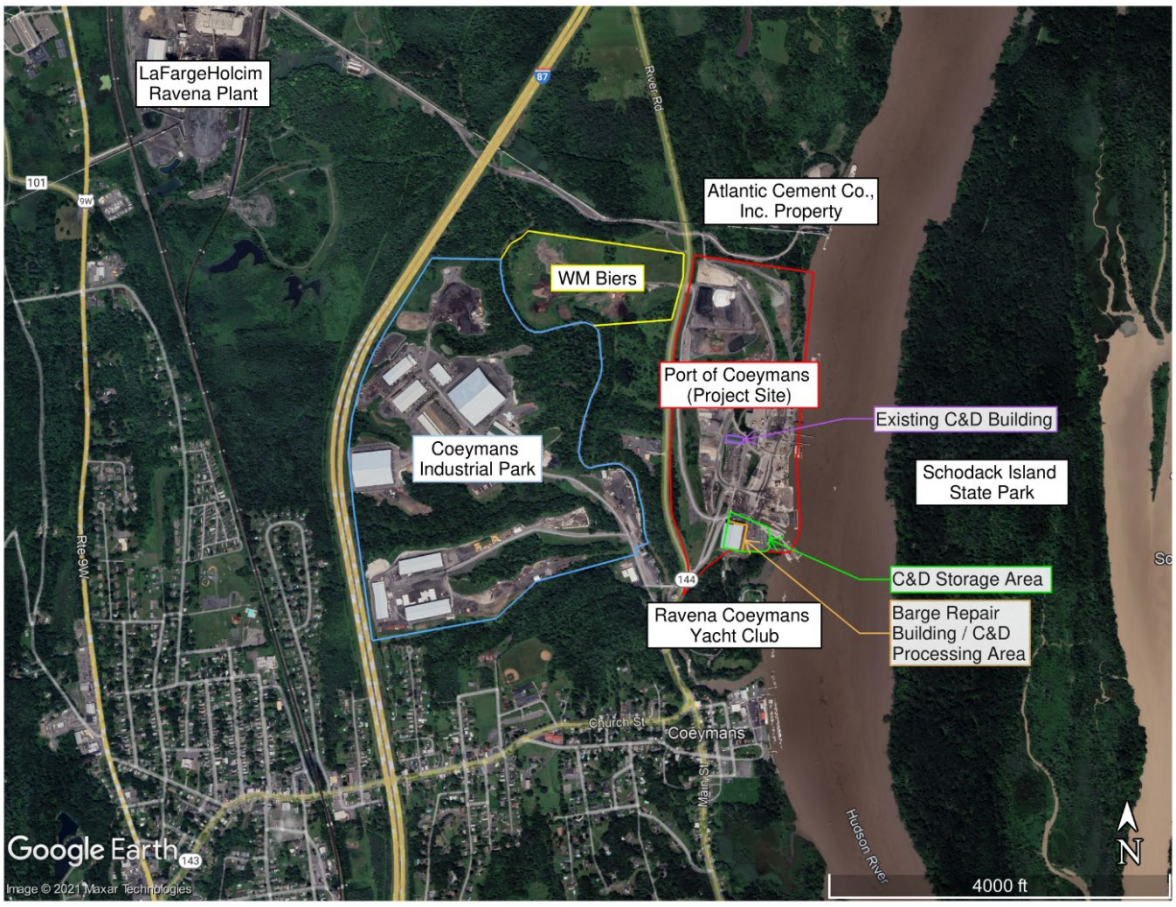

Figure 1: Site Location Map

1.3 Site History and Current Use

The owner of the POC site is P&M Brick, LLC, which is a privately-owned, full-service, deep-water inland marine terminal located along the Hudson River 10 miles south of Albany and 100 miles north of New York City. The POC site was transformed from the former Powell & Minnock Brick Company which founded in the late 1880s and was an operating brick plant until 2001 and with the site acquisition by the current owner occurring in 2002.

Currently, the POC site consists of an active port, including the main deep-water dock; inlet channel; and Tappan Zee Constructors (TZC) trestles associated with the former subassembly yard for the Governor Mario M. Cuomo Bridge. Existing activities include transport and storage of bulk materials such as road salt, gypsum, bauxite, clinker, sand/gravel, construction and demolition (C&D) materials, and scrap recycling. The existing C&D processing at the POC site will be relocated to the southern end of the port, with processing to take place within a portion of the existing barge repair building and outside storage.

1.4 Site Work Description

Site work associated with the Proposed Action will involve the regrading of the majority of the existing POC site to create fabrication, assembly, and storage pad areas. Grading activities will ultimately remove the existing northern driveway entrance along NYS Route 144 and drop the existing grade from elevation 130 feet above sea level to elevation 85 to 90 feet above sea level. The lower yard area adjacent to the Hudson River with the proposed new wharf would be graded to no more than 2% slope, while the upper pad and roadways would be graded to a slope of 4 to 5% and 6 to 8%, respectively. A single point of access for the POC site would be created at the existing southern driveway.

Specific upland site work includes stormwater and utility upgrades, construction of fabrication and storage buildings, and concrete batch plants. Proposed water-based work includes the removal of both sets of existing finger trestles (assembly sled and straddle crane) and replacing these components with a new 400-foot-long concrete wharf with steel bulkhead.

Dredging within the Hudson River will also be conducted to a draft depth of -34 feet below Mean Low Water (MLW) to accommodate large transport vessels for OSW supply and maintenance activities, with drafts up to 32 feet. A 250-foot-long spud barge will also be permitted along the southeast corner of the existing inlet channel to accommodate existing barge loading and off-loading operations. The proposed site improvements are shown in this FEIS below in Figure 2 and Appendix A; and are more fully described in the Draft Environmental Impact Statement (DEIS).

Once site work is complete, OSW operations are envisioned to include fabrication and assembly of heavy wind components for wind towers. These heavy wind components will be loaded out over the new high load capacity wharf for transport via barge down the Hudson River to staging sites or offshore wind farms. Should a need arise in the future, OSW operations could also include fabrication, staging, and load out of Gravity Based Structure (GBS) units at the POC site. While GBS units are considered as part of the environmental review as a future possibility to ensure the environmental impacts are considered, any additional improvements not included in the scope of this review required for GBS fabrication will need additional New York State Department of Environmental Conservation (NYSDEC) approval and environmental review. Improvements at the POC site are expected to support OSW activities for at least the next several decades.

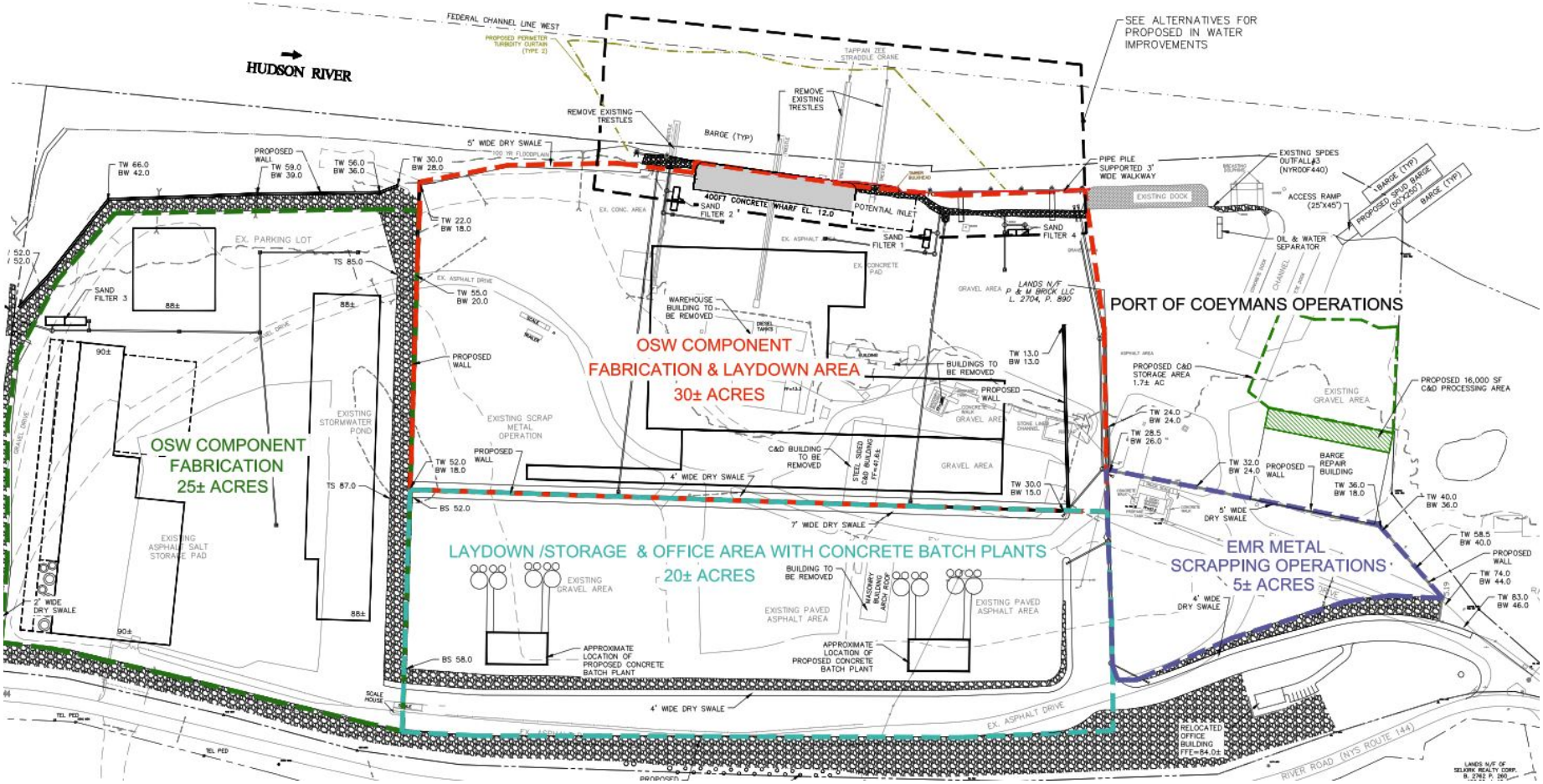

Figure 2: Overall Site Plan

1.5 Purpose and Need

The DEIS stated project purpose is to construct certain site infrastructure improvements at the POC to service the OSW supply chain, including the OSW projects recently awarded contracts by New York State Research and Development Authority (NYSERDA) (https://www.nyserda.ny.gov/All-Programs/offshore-wind). Under the Public Service Commission (PSC) Order authorizing offshore wind solicitation in 2018 and 2020, NYSERDA awarded several OSW projects with a combined total of 4,186 megawatts (MW).[1] Two (2) of the projects awarded in 2018 include the Empire Wind 1 and the Sunrise Wind projects, which is an $86 million investment to construct advanced foundation components for OSW turbines, in support of New York's mandate to achieve 9,000 MW from offshore wind energy by 2035.[2] The 2020 awards include the Empire Wind 2 and Beacon Wind OSW projects which are projected to generate a total of 2,490 MW. To meet the demands of these new initiatives, the POC site will be utilized to provide fabrication and laydown areas as well as support and maintenance services associated with these types of heavy lift projects. In the 2018 Ports Assessment Study, the POC was identified by NYSERDA as one of the facilities with greatest feasibility for OSW use and development.[3]

[1] State of New York Public Service Commission, "Order Authorizing Offshore Wind Solicitation in 2020," Case 18-E-0071, April 23, 2020.
[2] Sunrise Wind, "Governor Hochul Announces Largest Single New York State Offshore Wind Supply Chain Award of $86 Million to Support Sunrise Wind Project" https://sunrisewindny.com/news/2021/10/governor-hochul-announces-largest-single-new-york-state-offshore-wind-supply-chain-award.
[3] COWI North America, Inc., *"2018 Ports Assessment, Port of Coeymans,"* Final Report, NYSERDA No. 19-04, February 2019.

2.0 DESCRIPTION OF THE FEIS

This Final Environmental Impact Statement (FEIS) has been prepared pursuant to the State Environmental Quality Review Act (SEQR), Article 8 of the Environmental Conservation Law, and its implementing regulations at 6 NYCRR Part 617, relating to the Proposed Action. Pursuant to 6 NYCRR Part 617.9(b)(8), a FEIS consists of the following: the DEIS, including any revisions or supplements to it; copies or a summary of the substantive comments received and their source; and the Lead Agency's responses to all substantive comments. The DEIS is incorporated into this FEIS by reference here: https://www.carvercompanies.com/about-us/port-of-coeymans-offshore-wind-infrastructure-project/. Substantive revisions and supplements to the DEIS, in response to public comments received, are specifically indicated and identified in this FEIS.

2.1 Environmental Review History

After a coordinated review, NYSDEC was designated as the Lead Agency for the environmental review of the Proposed Action under SEQR. Based on information contained in a Full Environmental Assessment Form (FEAF), NYSDEC determined that the Proposed Action might have a significant impact on the environment, and adopted a Positive Declaration on July 10, 2020, requiring preparation of a DEIS.

An applicant-prepared Draft Scoping Document was noticed in the Environmental Notice Bulletin (ENB) on September 2, 2020. A 30-day public comment period was held, and three public comment letters were received from the following parties: Riverkeeper, Inc. (Riverkeeper) letter dated October 9, 2020, Barbara Heinzen, PhD letter dated October 8, 2020, and United States Coast Guard (USCG) letter, which is undated.

Towards the end of the 30-day public comment period on the Draft Scoping Document, the scope of the Proposed Action was modified by the Project Sponsor to include steel tower manufacturing. Although it is not standard practice, a revised Draft Scoping Document was prepared which addressed the modified Proposed Action and the public comments received on the August 31, 2020 Draft Scoping Document. A revised Draft Scoping Document, dated November 23, 2020, was published for a 14-day public comment in the ENB on November 25, 2020. The following public comments were received: Riverkeeper letter, dated December 11, 2020, and Barbara Heinzen, PhD letter, dated December 11, 2020. NYSDEC compiled comments from its own review, from involved or interested agencies, and from the public, and

used those comments, plus the Draft Scoping Documents, to develop the Final Scoping Document. The Final Scoping Document was published in the ENB on January 6, 2021.

Over the course of 2021, the Project Sponsor prepared the DEIS and supporting documentation for the Proposed Action. The final iteration of the DEIS was submitted to NYSDEC on December 23, 2022. The DEIS was accepted as complete by NYSDEC and was published in the ENB on January 26, 2022. A 30-day public comment period was held, and upon request from Riverkeeper, the public comment period was extended by one additional week. Public comments on the DEIS were received until March 4, 2022. No public hearing was held for the DEIS.

2.2 Public Comments on the DEIS

The following public comments were received on the DEIS:

- Riverkeeper letter, dated March 4, 2022 (Riverkeeper Comment)
- Barbara Heinzen, PhD letter, dated March 4, 2022 (Heinzen Comment)
- Clean Air Coalition of Greater Ravena-Coeymans, NY letter, dated March 4, 2022.

The letter from the Clean Air Coalition is a support letter for the Heinzen Comment letter and therefore there are no responses provided to this letter in this FEIS.

Copies of the written public comment letters received on the DEIS are included as Appendix B to this FEIS. Responses to these comments comprise Section 3.0 of this FEIS.

2.3 Changes to the Proposed Action Since the DEIS

Since the DEIS was published for public comment on January 26, 2022, the Proposed Action has been revised to address NYSDEC and public comments, as follows:

- The proposed POWI grading plan was adjusted to reduce the quantity of excess export material from approximately 3.7 million CY to approximately 1.0 million CY. In addition to this reduction in export material, the Project Sponsor provided additional clarification on the potential use of the excess materials at adjacent sites (See Section 3.2) and adjusted the transportation narrative to reflect the reduction in construction truck traffic (See Section 3.6).
- Additional details are provided in this FEIS on potential emissions associated with both construction and operation of the POWI project (See Section 3.4.) This information is

included in Table 2: Estimated Construction Emissions and Table 3: Estimated Operation Emissions.

- To address the take of essential shortnose and Atlantic sturgeon habitat, the Project Sponsor has executed an Implementation Agreement with NYSDEC and New York State Office of Parks, Recreation and Historic Preservation (OPRHP) to contribute money toward restoration of marsh habitat at the nearby Schodack Island State Park to create a net conservation benefit for Atlantic and shortnose sturgeon due to the habitat impacts on site. A copy of the Implementation Agreement is included in Appendix C of this FEIS.

2.4 NYSDEC Permit Applications

P&M Brick LLC has applied to NYSDEC for the following permits:

- Excavation or Placement of Fill in Navigable Waters[4]
- Construction, Reconstruction and Expansion of Piers, Wharfs, Platforms, Breakwaters, Docking Facilities, and the Placement of Moorings[5]
- Endangered and Threatened Species Take Permit[6]
- Clean Water Act Section 401 Water Quality Certification

In addition, P&M Brick LLC will need to apply for coverage under the following NYSDEC State Pollutant Discharge Elimination System (SPDES) General Permits[7]:

- SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (GP-0-17-004)
- SPDES General Permit for Stormwater Discharges from Construction Activity (GP- 0-20-001)

[4] Environmental Conservation Law (ECL) Article 15, Title 6, New York Codes, Rules and Regulations (6 NYCRR) § 608.5
[5] ECL Article 15, 6 NYCRR § 608.4
[6] ECL Article 11, 6 NYCRR § 182
[7] ECL Article 17, 6 NYCRR § 750

3.0 RESPONSES TO SUBSTANTIVE COMMENTS ON THE DEIS

3.1 General Comments

Comment: Riverkeeper recognizes the need for OSW for a more sustainable future and generally supports the development of OSW projects in furtherance of the shift to renewable energy. However, the environmental impacts of OSW manufacturing should be balanced and minimized whenever possible when achieving this goal. It would be contrary to the purpose of OSW if its manufacture led to significant environmental damage and carbon emissions. Therefore, the POC improvements should be carefully tailored to meet the structural needs OSW supply chain.

Response: Comment noted.

Comment: Because of the substantial environmental impact of this project, the applicant needs to make the case that this work is needed at this time to support the Sunrise Wind project.

Response: The Project Sponsor has indicated that they have several OSW tenants, including tenants to support the Sunrise Wind project. As discussed in Section 1.5 of this FEIS, the Proposed Action is needed to create additional laydown, fabrication, and manufacturing capacity for OSW components to support New York States Clean Energy Standard for 70% renewable energy by 2030. The POC site was selected in the 2018 Ports Assessment Study by NYSERDA as an ideal facility to support this activity.

Comment: The applicant needs to clarify what type of wind power assembly will be taking place at the Port and submit a signed statement from the wind power company describing the activities they expect to do at the Port. The wind power company should also state whether their contract can only be completed with the proposed alterations to the existing Port of Coeymans.

Response: The Project Sponsor has entered into agreements with various OSW component manufacturers to fabricate and transport materials from the POC site in support of OSW projects like Empire Wind and Sunrise Wind. Specific components being manufactured include, but are not limited to blades, nacelles, monopiles, suspended internal platforms, anode cages, and external platforms for OSW facilities. Additional correspondence, including a letter of support from the Sunrise Wind Project, has been added to Appendix C in this FEIS. As referenced previously, the 2018 Ports Assessment clearly evaluates and concludes that the POC, along with the necessary infrastructure improvements, is a preferred site to support the OSW supply chain.

Comment: The DEIS does not discuss the specific activities that are proposed for the POC. Previously during the scoping process, Riverkeeper had been in conversations with the Equinor energy company, who expressed an intent to use POC for fabrication of gravity bases. Since that date, it is our understanding that Equinor no longer intends to use the Port, and the Sunrise Wind project has instead contracted with the Port. The DEIS should include additional discussion of the OSW project's specific anticipated activities to provide justification and context for the proposed improvements, such as the addition of two concrete batch plants which are of particular concern.

Response: The Project Sponsor is redeveloping the POC site with infrastructure upgrades on both land and water side to support the OSW industry. These efforts include manufacturing and assembly of OSW components, as well as long-term support and maintenance of various OSW projects proposed on the East Coast of the United States, including Equinor's Empire Wind Project as well as Orsted's Sunrise Wind Project. Some of the OSW components currently planned for fabrication and staging at the POC include blades, nacelles, monopiles, suspended internal platforms, anode cages, and external platforms. While not needed at this time, GBS units and the concrete batch plants are still contemplated as part of the POWI application in support of the future need for concrete foundations such as GBS units. Some of the other turbine components such as platforms will also involve the use of concrete. While GBS units are considered as part of the environmental review as a future possibility to ensure the environmental impacts are considered, any improvements outside of what is currently proposed in the NYSDEC permit applications to support future GBS development will require further review by NYSDEC.

Comment: The EIS needs to include a clear and credible statement of where and how the current, and increasing, waste management business organized by the Coeymans Recycling Center and Carver Laraway will be conducted as wind power activity increases at the Port.

Response: There is no proposed growth of the C&D activities at the POC at this time or in the reasonably foreseeable future. Per the C&D Permit Modification, currently under NYSDEC review, the C&D storage/processing area is proposed to be relocated, and all remaining aspects of the permit remain unchanged. No facility acceptance or storage rate increases are proposed. The existing C&D activity will be simply relocated to the southern area of the POC per the project plan set enclosed in this FEIS as Appendix A.

Comment: Additional analysis for the potential impacts from displaced C&D activities at the Port is needed. While the DEIS claims that the Port and surrounding sites are completely built

out such that there is no growth potential, there is only limited discussion of potential changes in the volume of C&D activities at the site. Riverkeeper would like to understand whether the relocation of the C&D activities would lead to any change in the volume of C&D activities at the Port either presently or in the future post-OSW manufacturing. It is our position that while Port improvements for OSW are worthwhile, using the improvements as a guise for future expansion of its C&D or waste handling operations without thorough environmental review of the impacts of those activities is unacceptable. If future expansion of C&D or waste operations is reasonably foreseeable, the impacts of that expansion must also be included within the environmental analysis.

Response: *There is no proposed growth of the C&D activities at the POC as part of the Proposed Action. Per the C&D Permit Modification, currently under NYSDEC review, C&D Debris Handling and Recovery storage (20,000 tons maximum at any time) will be relocated to the south end of POC site, all other aspects of the permit are proposed to remain the same. The facility will also be permitted as a Transfer facility to allow for removal of material from the POC site. If expansion of C&D or waste operations is contemplated in the future, these activities will be subject to a full environmental review.*

Comment: The expansion of C&D operations at the nearby W.M. Biers property was mentioned in Section 1.1 of the DEIS. Discussion of whether this will impact the volume of C&D activity at the Port is needed. If the Biers operation intends to source C&D material through POC, the impact of the relocation on those logistics must be assessed in terms of traffic, noise, air emissions, and any other relevant impacts.

Response: *Future C&D Operations at the nearby W.M. Biers property will have no impact on the volume of C&D activity at the POC site and is a separate operation, not associated with the Project Sponsor or the POC site. The proposed C&D transfer facility at Biers will accommodate processing and transfer of typical construction and demolition debris material from construction sites.*

Comment: The displacement of C&D operations is anticipated to move operations to the southern portion of the POC site which formerly – or currently – houses salt storage piles. Clarification should be provided about whether the salt piles are still currently present at that location and when they will be completely removed. Discussion on removal and remediation of any remaining salt contamination in or around the stockpile areas prior to relocation of the C&D operations is needed. The Port's salt handling processes have previously come under scrutiny by

DEC and have more recently been called into question after large amounts of fugitive dust have been impacting areas surrounding the Port.

Response: The proposed relocated C&D storage area is a graveled or paved area that has never been used for the storage of salt. There are no outdoor salt piles remaining currently at the POC site. Any salt piles at the POC have been relocated to the new indoor warehouses at the CIP, and the Individual Industrial SPDES Permit for salt storage at the POC will be relinquished upon issuance of the POWI permits.

Comment: Given the growth of the Port and its allied business in the past twenty years, the EIS needs to include a clear and credible statement of the business goals and ambitions for the next twenty years, at least up to 2035-2040.

Response: The investments being made at the POC are expected to support OSW activities for the next several decades.

Comment: The EIS must make a detailed statement of the cumulative impact of the industrial development along NYS Route 144 and the Hudson River on local residents, especially in the Hamlet of Coeymans and Ravena. Ideally, a survey of residents in the Hamlet of Coeymans and Ravena where the impact of industrial traffic, noise and pollution is most noticeable, should be conducted.

Response: Section 9.0 "Cumulative Impacts" of the DEIS discusses the cumulative impact of the POC, CIP, and W.M. Biers developments along NYS Route 144 in detail. Conducting a survey of residents in the Hamlet of Coeymans and Ravena was not included in the Final Scoping Document and therefore, was not a required element of the DEIS.

Comment: The EIS needs to compare recent information about plants, animals, fish and habitats in the industrialized area with information from the same area before it was industrialized. Without such evidence, any claim of only minor cumulative impacts cannot be justified.

Response: Past and future improvements along NYS Route 144 are subject to SEQR review, which includes examination of potential impacts to existing plants, animals, and habitat. Baseline data for existing flora, fauna and associated habitats, found both on land and n-water, have been documented in the many studies conducted at the POC site over the last decade. Cumulative impacts were discussed and summarized in Section 9 of the DEIS. Any impacts identified during these reviews were avoided, minimized, or mitigated through implementation of project stormwater controls, working within required work windows, and habitat restoration. It

is further noted that the POC site has been industrialized since inception of the Powell Minnock Brick plant dating back to the late 1880's, including a clay mine.

Comment: The applicant must clarify all the long term uses of the redesigned Port and address the combined impact of a growing wind power business running alongside a potentially large waste management/construction materials business in this stretch of the Hudson River and NYS Route 144.

Response: Comment noted. Please see responses above which clarify the long-term uses of the POC site.

3.2 Land

Comments: The DEIS should explicitly include assessment of any potential use of borrow materials from the POC site grading as fill on adjacent properties. Additionally, the exact locations where borrowed materials are to be deposited need to be identified and assessed for the environmental impact on biodiversity and endangered species living in those areas. Though the DEIS does identify the sites, additional discussion of the potential environmental impacts of use of the fill at these sites is needed to determine whether these sites are viable options.

Response: The Project Sponsor has identified a few different locations to export the POWI borrow material (a.k.a., excess material), including the adjacent LafargeHolcim and Tripp Powell properties, west and north of the POC site, respectively. Figure 3 below shows the locations of these receiving properties. A proposed grading plan for the Powell Borrow site has been added to the Appendix A of this FEIS and Figure 4 below depicts the areas on the LafargeHocim property where excess material may be brought.

Once the exact location, use, and amount of fill is determined, environmental impacts at the receiving properties will be analyzed as part of the approval process needed for such placement. These properties are accessible by off-road trucks and will be the focus for placement of the exported material. These construction truck trips have been studied as part of the Traffic Impact and Access Study (TIAS)[8] and are discussed in more detail in Section 3.6, Transportation of this FEIS.

[8] Traffic Impact and Access Study – P&M Offshore Wind Infrastructure Project, Port of Coeymans, prepared by VHB Engineering, Surveying, Landscape Architecture and Geology, PC, last revised April 13, 2022.

Comment: Clarification is needed regarding the nature of the 314 Gedney Hill Road (Gedney Hill Mine) site. The DEIS notes in Section 3.1.2 that, "At this time, no mine sites have been selected." However, the Gedney Hill Mine was listed as an active permitted mine within the Town of Coeymans Natural Resource Inventory from July 2019. If this site is in fact a mine, then the DEIS should note the additional approvals which would be needed.

Response: The DEIS stated that a Mining Permit Modification Plan will be required if excess material is relocated to an off-site mine. The recent Gedney Hill mine importation request to NYSDEC has been withdrawn and importation to this mine has been removed from the analysis in the FEIS. The Project Sponsor has not identified any mines for importation of the excess material. If the Project Sponsor proposes to bring excess material to a mine, further analysis and a supplemental EIS may be required.

Since the preparation of the DEIS, the Project Sponsor has revised the grading plan for the POC site which has significantly reduced the amount of material that will be exported from the POC site. A revised grading plan for the POC site is included in Appendix A of this FEIS. The following narrative describing impacts to Land has been updated since the DEIS (originally Section 3.1.2 in the DEIS):

> Due to the approximately 1.0 million CY of excess material from required site flattening, an alternative analysis was conducted of neighboring sites for use of the excess material from upland excavations and retaining walls. Nearby properties were screened for their suitability as potential importation sites. Sites that were initially screened include property owned by Coeymans Recycling Company (CRC), LafargeHolcim, Gedney Hill Mine owned by P&M Brick, Powell property at 87 Bronk Road and property owned by LaMountain at 71 Kinley Road just west of the LaFarge entrance on US Route 9W. Ultimately, the adjacent LafargeHolcim and Powell sites were selected for exporting the excess material. Clay materials transported to LafargeHolcim may potentially be used for various applications, including landfill cover, reclamation of areas used for aggregate operation, and quarry reclamation. Materials brought to the Powell property may potentially be used for slope flattening and other site grading operations, detailed in the grading plan in Appendix A. Further coordination with both property owners will be required prior to the importation of excess material. Table 1 and Figure 3 below summarizes the sites that were analyzed for bringing the excess material, use of the fill, estimated maximum quantity of fill able to be received at the sites, and a plan depicting the location of these sites and their proximity to the proposed project site. Ultimately, the proposed borrow sites will likely split the total 1.2 million CY excess borrow and dredge

material, with the exact proportions depending on the composition of the material and its intended use. Once the exact location, use, and amount of fill is determined, environmental impacts at the receiving sites will be analyzed as part of the approval process needed for such placement.

The volume of material to be exported off-site was minimized through the review of alternative grading plans. The selected alternative was designed to reduce the cut required and to reduce the number of retaining walls while maintaining the greatest amount of usable space as possible. The upland alternative contemplated in the DEIS required approximately 3.7 million CY of export and associated impacts to construct. The selected plan, alternatively, generates approximately 1.0 million CY of excess material. The reduced amount of fill is more easily managed and can be transported and used on the adjacent LafargeHolcim and Powell sites. The selected alternative also allows heavy OSW components to be loaded directly onto barges on the Hudson River for transportation downriver to a staging facility for the OSW farm.

Table 1:Excess Material Export Sites

Site Address	Tax Map ID #	Potential Fill Use	Maximum Fill Capacity	Anticipated Fill Volume
87 Bronk Road (Tripp Powell Property)	156.-3-1.1	General Fill	1,000,000± CY	1,000,000± CY
1916 US Route 9W (LafargeHolcim)	156.-2-1.11	Landfill Cover, Site Reclamation, Quarry Reclamation	2,000,000± CY	200,000± CY

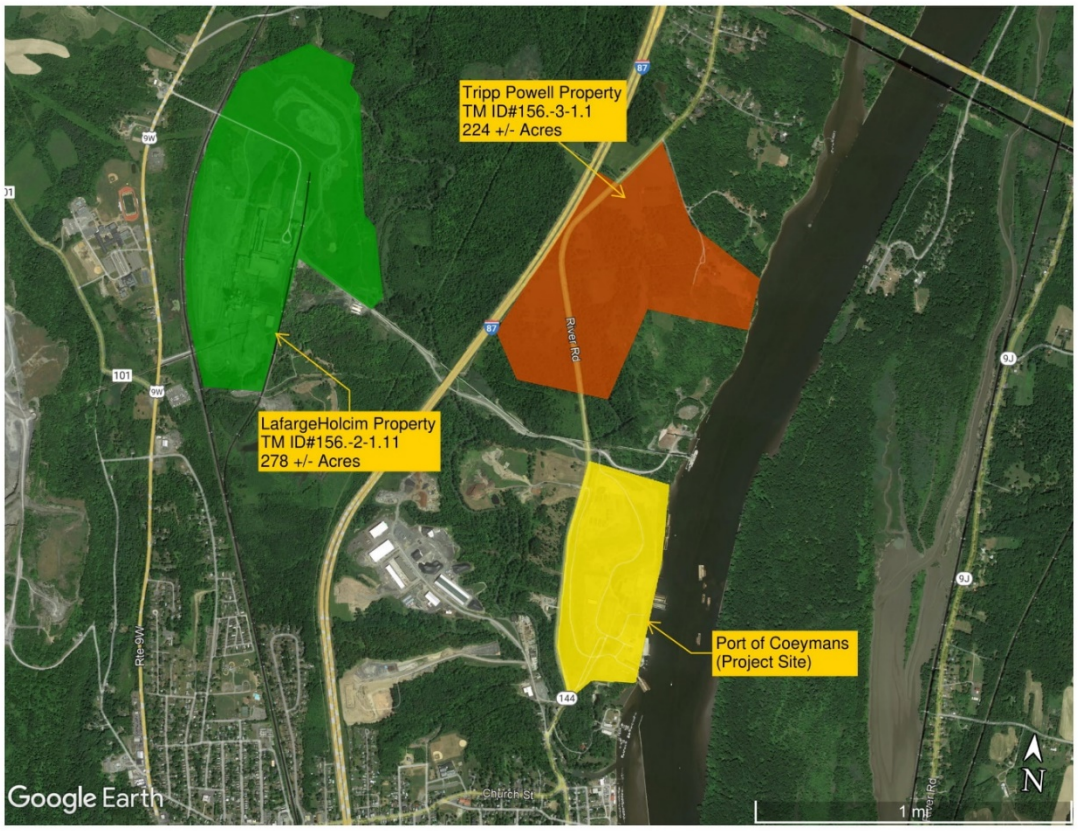

Figure 3: Excess Material Export Sites

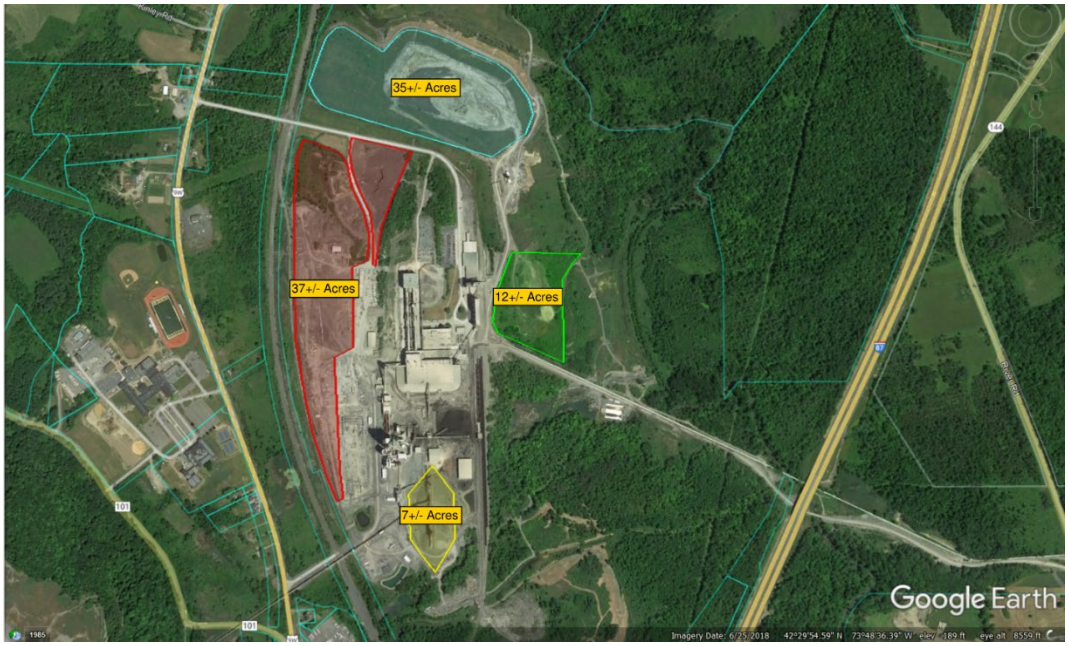

Figure 4: LafargeHolcim Export Material Site

3.3 Water Resources

Comment: It seems improbable that the OSW processes will only produce sanitary wastes without any industrial wastewater as claimed in the DEIS, Section 4.1. Section 4.6 of the DEIS briefly acknowledges the existence of wastewater from cement batch plants and component fabrication processes claiming it will be collected and recycled onsite. The DEIS must further justify this statement that there will be no wastewater generated or assess potential water controls. Among water controls studied, the DEIS should describe in detail any contemplated on-site water treatment system for all wastewater generated by the project—including from any cement batch plants—with no off-site disposal, which treats to a level sufficient for reuse for the project.

Response: GBS units are the largest proposed source of concrete wastewater anticipated for the POWI project. While these components are no longer the primary or initial component for the project, wastewater from concrete will still be treated from any batch plants with a typical pH control and monitoring system and aggregate removal system and recycled. A wastewater collection, treatment and recycling system will be included with the final design of the concrete batch plants. This treatment system will collect contaminated water from the batch plant mixers, truck washing areas, storm water, concrete batching areas, and any other wastewater from the operation of the batching plants. Collected water will be processed by an on-site commercial recycling system, which includes pH monitoring and control and aggregate removal. Recycled water can be used for concrete curing and batch water and will not be discharged from the site.

Fabrication of the other OSW components at POWI involve a marginal water demand for domestic and commercial use and can be treated by connection to the existing Town of Coeymans Sewer District. As discussed in the DEIS, the Town of Coeymans has plans to extend their water and sewer district north along NYS Route 144. The Town of Coeymans has engaged the engineering firm Barton & Loguidice to perform a feasibility study to analyze both proposed sewer and water district extensions along NYS Route 144 from the Hamlet to LafargeHolcim. The study will include an evaluation of the pump station on Riverside Drive, the facility closest to the POC site and CIP. A copy of these studies are included in Appendix E of this FEIS.

Comment: The EIS needs to include water demand figures from the Coeymans Industrial Park, both current and foreseen. There also needs to be clear evidence of an agreement with the Village of Ravena to draw on their water, as well as the agreement of the City of Albany if supplemental water is to come from the Alcove Reservoir. In the event that Ravena cannot

supply adequate water, alternatives such as drawing from the Hudson River, need to be explored and evaluated for their impact.

Response: *The Project Sponsor has stated that CIP has reached near full buildout and its current water demand is not expected to increase as a result of any future warehouse construction at CIP or the POWI project. The Village Attorney has provided a letter on behalf of the Village of Ravena indicating that the Village can supply enough water adequate to support the project. As indicated in the DEIS Section 4.1, "Utilities – Water Supply & Wastewater Disposal," anticipated water use for POWI project is only 10,000 GPD and 100,000 GPD if the concrete batch plants are operated at full capacity, which was determined to be supported by the existing Village water system in accordance with the current intermunicipal water agreement. The larger water demand for concrete production would be drawn at off peak hours and stored on the POC site. The POC site is currently within the Town of Coeymans water district and serviced by the water line on NYS Route 144 at the south entrance to the POC.*

Comment: The DEIS, on p 42, states that bottom sampling for pollutants at the Port was done in 2014. This needs to be updated and needs to include PCBs and salt. In an ideal world, sampling of areas like the bay at the mouth of the Hannacroix Creek where tides and currents may have deposited pollution from the Port should also be done.

Response: *Additional sediment sampling was performed on August 5, 2020, as reported in DEIS Appendix 10.4 "ATL Subsurface Investigation & Sediment Sampling." Sampling off-site locations, such as the mouth of the Hannacroix Creek, would not be indicative of potential pollutants from activities on the POC site. The POC site and CIP do not have any outfalls located on the Hannacroix Creek. It is further noted that proposed dredge spoils were determined to be primarily Class A sediments, which are free of PCB contaminants.*

3.4 Air Quality

Comment: The air emissions of the two proposed concrete batch plants and anticipated manufacturing processes should be examined more closely rather than in a later permit application as stated in Section 3.3 of the DEIS. It is important to know whether there will be an impact prior to construction of the plants.

Response: *The potential environmental impacts from the two proposed concrete batch plants were considered during the preparation of the DEIS. As stated in the DEIS, the proposed batch*

plants will employ shrouds and baghouses to control fugitive dust, in addition to other mitigation measures and applicable provisions from 6 NYCRR Part 211.

Comment: In addition to the emissions from the activities themselves, the DEIS should account for emissions generated in the supply chain. In particular, it is likely that cement for both the OSW processes and the Port improvements themselves will be sourced from the nearby LafargeHolcim cement facility in Coeymans. The LafargeHolcim plant attempted to use tire-derived fuel in the past, but NYSDEC revoked its authorization last year. It is critical that restrictions be put in place to prevent any future use of cement created by tire-derived fuel due to the large potential air impacts.

Response: The Lafarge Plant is a separate NYSDEC permitted entity that is not under control of the Project Sponsor. Despite this, as the commentor points out, this plant is already restricted from using tire derived fuel; therefore, there is no risk of potential air impacts from its use.

Cement will be sourced from the nearby LafargeHolcim Cement Plant, further minimizing impacts from the proposed batch plants. Given the proximity of the LafargeHolcim plant to the POWI project, the delivery and use of cement from this plant would have fewer potential impacts than sourcing material from the alternate more distant sources.

Comment: If wind power activity at the Port requires the introduction of concrete batch plants, Title V permits will be needed for both the batch plants and the additional cement produced by LafargeHolcim. A ban on the use of waste as fuel should be required, and LafargeHolcim must install a continuous air monitoring system with results published every month so that local people can track air quality.

Response: As designed, the concrete batch plants do not require an Air Title V permit and in fact, the concrete batch plants are exempt from needing a NYSDEC Air Registration, provided that particulate is controlled through the use of a baghouse and applicable provisions from 6 NYCRR 211 and 212 are complied with, including no air contamination from visible emissions. If potential threshold values for an Air State Facility or Air Title V requirements are contemplated to be exceeded, further analysis and a supplemental EIS may be required.

GBS units are no longer the immediate focus for the POWI project, therefore the demand for concrete has been reduced and continues to be negligible compared to the annual production of cement at Lafarge Holcim, which is 2.2 million metric tons per their fact sheet. The Lafarge Plant is a separate NYSDEC permitted entity and is not under control of the Project Sponsor.

NYSDEC requested that the Project Sponsor provide an analysis of the estimated emissions from both the construction and operation phases of the project. The following narrative describing impacts to Air Quality has been updated since the DEIS (originally Section 3.3 in the DEIS):

> Additional analysis was performed for both construction and operation emissions using the EPA Port Emissions Inventory Guidance, Port of Oakland Emissions Inventory, and assumed equipment. The same equipment lists were used that were discussed in Appendix 10.9, "Noise Assessment" in the DEIS. Emissions from mobile equipment were based on the estimated hours of operation, load factor, and engine size provided by the Project Sponsor. Equipment was conservatively assumed to operate for 8,760 hours per year.
>
> For the operation phases, concrete batch plant emissions were based on two batch plants each producing up to 8 batches per hour. Each batch was assumed to be 100 cubic feet. Batch plant emissions were based on the NYSDEC particulate emission of 0.05 grains per cubic foot (7,000 grams / lb). The batch plants were also conservatively estimated to operate for 8,760 hours per year. Emissions were estimated for nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide (SO2), volatile organic compounds (VOC), particulate matter (PM_{10} and $PM_{2.5}$), carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) , as outlined in Table 2 and 3 below (emissions are provided in short tons per year). Emissions of hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride and nitrogen trifluoride are not expected to occur during construction or operation. Memoranda providing further details on the methodology for this analysis are enclosed in Appendix C of this FEIS.
>
> Emissions from the POWI project construction and operation are expected to be similar or slightly higher than existing emissions. In addition to the mitigation measures outlined in Section 3.3 "Air Quality" of the DEIS, mobile source emissions were minimized by decreasing the borrow material to be removed from the POWI site from approximately 3.7 million CY to approximately 1 million CY and focusing placement of such fill to the adjacent LafargeHolcim and Powell sites, as opposed to sites greater distances from the POC site. Per this analysis, POWI is not expected to be a major source of emissions and is not expected to cause a significant potential adverse impact relating to air emissions.

Table 2: Estimated Construction Emissions

	NO_x	CO	CO_2	VOC	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_2O
Tons per year	53.08	60.28	0.31	25.03	4.80	4.64	39,629	2.40	1.69

Table 3: Estimated Operation Emissions

	NO_x	CO	CO_2	VOC	PM_{10}	$PM_{2.5}$	CO_2	CH_4	N_2O
Marine Delivery	54.19	39.02	0.06	7.46	1.85	1.80	5,756	0.67	0.20
Batch Plants	--	--	--	--	0.05	0.05	--	--	--
Mobile Equip.	14.53	5.88	0.10	5.60	0.52	0.48	21,417	0.14	0.12
Total (Tons per year)	68.72	44.90	0.16	13.06	2.42	2.33	27,173	0.81	0.32

3.5 Aquatic Habitat and Protected Species

Comment: The EIS must provide evidence that moving barges in and out of this "temporary" berth on the West Bank does not affect underwater habitat.

Response: As stated on page 40 of the DEIS, the main potential impact from barge movement at the new wharf will be shading, as sufficient draft depth exists or will be dredged. However, these impacts are temporary, as barges will be regularly rotated into and out of the berth. Per the previously prepared Essential Fish Habitat studies, enclosed with the DEIS as Appendix 10.5, it was concluded that sturgeon mortality from vessel strikes did not change significantly from continued use of the POC's berth on the west bank.

Comment: Riverkeeper appreciates the core sampling and commitment to mitigation measures such as sturgeon monitoring and offsite habitat restoration in the DEIS. However, as expressed in our scoping comments, it is Riverkeeper's position that no maintenance dredging should be approved past the duration of the wind fabrication project, for which these improvements are designed to facilitate.

Response: The dredge area will be subject to a 10-year maintenance dredge estimated to be a volume of 20,000 CY. Any dredging, including maintenance dredging, will be permitted only within the work window from September 1 to December 31, and within the confines of a

weighted turbidity curtain. The maximum NYSDEC permit term for this activity is 10 years and future maintenance dredging beyond 10 years will be subject to a separate permit application review process.

Comment: The trestles were originally installed as a "temporary" structure and were not required to undergo an environmental impact statement. It is Riverkeeper's understanding that subsequent modification of the trestle permits allowed them to remain permanently and transferred ownership to POC. The increased harm from the removal of trestles was cited as justification for its transformation into a permanent structure. While the DEIS examines the impacts of construction of the new wharf and dredging, it fails to address the various impacts of trestle removal specifically. Assessment of the methods of trestle removal and its impacts are needed separate from the existing discussion of the impacts of pile driving required for the construction of the new wharf.

Response: Removal of the existing trestles will occur prior to any dredging activity for the proposed wharf. The Tappan Zee trestles will be completely removed by a vibratory extractor and barge mounted crane. Then the trestles will be disassembled and removed by the same barge mounted crane. Once removed, the trestle piles will be recycled on site. Impacts from the trestle removal were considered by NYSDEC staff and have been accounted for and mitigated by the off-site mitigation planned on Schodack Island.

To reduce impacts to underwater habitat and species, all in-water work will be performed within the confines of a weighted turbidity curtain and within the seasonal work window. For pile removal, vibratory extraction was selected as the preferred method since it has the least amount of potential noise impacts to aquatic species, causes the least amount of disturbance to the riverbed, and results in complete extraction of the piling. Other pile removal methods, including clamshell bucket extraction and pile cutting, were discounted. Clamshell bucket extraction has an increased potential to disturb bottom sediments and can result in partial pile removal. Similarly, pile cutting would result in the pile partial remaining in place. It is important that all trestle piles are completely removed prior to the dredge commencing, which will occur in the area of the existing trestle structures. Vibratory removal will also decrease the likelihood of any suspended sediments escaping the during in water work and will limit the actions that are likely to generate turbidity to the proposed dredging activities.

The following narrative has been revised since the preparation of the DEIS (originally Section 2.4.3 in the DEIS):

Offshore work will commence in Fall 2022. Work in the Hudson River will consist of the demolition and removal of the existing finger trestles and offshore piles. A 250-ton crawler crane will be walked onto a barge to deconstruct the short finer trestles from the river. The trestles' walkways, mats, beams, and pile caps will be deconstructed and removed with the assistance of the barge mounted crane. The barge mounted crane will then utilize an ICE-44 vibratory extractor to fully remove piles from the riverbed. Scrap steel and other materials will be disassembled and processed at POC and then transported off site down river via ship or reused on site. Typical hours of operation during the offshore demolition phase will be from 6 am to 6 pm. Existing rip rap will remain within the limits of the proposed wharf. However, some of the rip rap will be removed to install the proposed steel bulkhead immediately in front of the existing timber bulkhead and the remaining rip rap will be encapsulated within the new wharf.

Comment: The EIS must show why it is environmentally advisable to remove the trestles rather than leave them in place. Mitigation measures for the impacts of trestle removal must be considered, and in particular habitat mitigation – as identified in Section 3.2 and 4.7 of the DEIS – must be conducted. Also, reinstallation of the trestles upon the wind fabrication's completion must not be permitted. If possible, more in-depth discussion of mitigation measures should be added to the DEIS as well.

Response: The Project Sponsor has stated that it is necessary to remove the trestles to complete the in-water improvements, including dredging and wharf construction. The new wharf is necessary for loadout of heavy OSW components. The Proposed Action does not include the reinstallation of trestles upon the completion of the POWI project. All in-water construction work, including trestle removal, is being mitigated through the restoration of side channels, tidal wetlands, vegetated shallow waters, back waters, and intertidal habitats at Schodack Island. Side channels on Schodack Island were previously filled with spoils from dredging the Hudson River for commercial navigation. Benthic habitat restoration will provide new foraging habitat for shortnose sturgeon and new refuge area for several fish species, including Atlantic sturgeon. The mitigation is a Net Conservation Benefit Project (NCBP) that will satisfy the requirements of ECL § 11-0535 and 6 NYCRR Part 182. The NCBP will create 1.8 acres of benthic habitat at Schodack Island State Park by converting habitat that is currently upland into habitat that can be used by sturgeon.

Comment: Presence of sturgeon, Atlantic & short-nosed: The supporting evidence for the presence of sturgeon comes on p. 888 of a study of the sturgeon population done in 2015 and 2016. These population numbers need to be updated as that can affect likely impact.

Response: DEIS Appendix 10.6, "HDR Sturgeon Impact Assessment," requires continued telemetry monitoring by an acoustical array for sturgeon within the Hudson River around the vicinity of the POC site. This monitoring provides sufficient data to determine whether or not POC activities are having any adverse impact on sturgeon migration and population. This monitoring will continue for a duration of five (5) years to determine if in-water work and vessel traffic have an impact on sturgeon movement in the Hudson River.

3.6 Transportation

Comment: In consideration of the public comments received on the DEIS, NYSDEC requested that the Project Sponsor identify measures that will be taken to minimize truck trips through the nearby Hamlets. This should include consideration of the following measures:

- Including clauses in tenant leases requiring strict adherence to required truck routes as a tenant obligation
- Video surveillance cameras at the south entrance to monitor and ensure truck traffic follows the required route.
- Installation of signage on the roadways within the Port to indicate the required truck route when exiting the Port.
- Conducting regular audits of tenants trucking service contracts to ensure the identified truck routes are being followed and requiring tenants to maintain weekly monitoring logs reflecting daily reports of routes taken by drivers based on GPS data or other measures to be determined at time of site plan review.
- Installation of signage long the internal roads and haul roads prohibiting off-road oversized trucks from traversing NYS Route 144.

Response: The Project Sponsor indicated that businesses at the POC and CIP will utilize best practices when determining preferred transportation routes. This includes avoiding residential areas, like the Hamlets, if possible and limiting the use of Jake Brakes. The Project Sponsor will install internal signage indicating that the route to the north on NYS Route 144 is the preferred truck route.

Comment: If this site plan is designed to serve both wind and waste, then the EIS needs to reflect the impact of both businesses. It should include at the very least an estimate of the increased waste handling traffic by road, rail and river, including ship and barge traffic, that can be

expected as the Port's waste and road building materials businesses take advantage of the proposed modifications to the Port.

Response: Terrestrial traffic trips associated with both POWI and the other POC operations is accounted for in the TIAS in Appendix D. Vessel traffic to the existing dock and inlet channel will continue to service the existing Carver Companies business at the POC and is anticipated to remain at one (1) ship and two to four (2-4) barges per week average, as discussed in the DEIS. There is no proposed increase in C&D handing at the POC site.

Comment: Traffic monitoring on NYS Route 143, from the Port to US Route 9W, needs to be done for a full day, not just sample hours, with monitors that can also record the noise of the heavy trucks which is especially loud on the Church St (NYS Route 143) hill to NYS Route 144. Traffic monitoring on NYS Route 144 through Coeymans and New Baltimore also needs to be done. Special care should be taken to ensure that the monitoring is done on days of heavy as well as light industrial truck traffic from the Port.

Response: Traffic volumes were recorded with automatic traffic recorders (ATRs) for the period from Tuesday, January 5, 2021, through Thursday, January 7, 2021, not just for the peak hours. In order to assess potential effects from Covid-19 additional traffic volumes were recorded in October of 2022 and a sensitivity analysis was performed. These results are discussed in the previously prepared TIAS in DEIS Appendix 10.7. Noise impacts from construction traffic were also considered and analyzed in the Noise Assessment in DEIS Appendix 10.9 for both construction and operation scenarios.

Comment: Regarding vessel traffic to the Port, on page 42 of the DEIS, the last counts for vessel traffic to the Port were done in 2014 and 2016. These counts also need to be updated.

Response: Vessel counts include current ship and barge counts up to the year 2020. This information was provided in the DEIS on page 57 and is being provided here for ease of reference (Note: these tables were previously included in the DEIS as Table 5 "Historical POC Ship Traffic" and Table 6 "Historical POC Barge Traffic").

Table 4: Historical POC Ship Traffic

Existing Port of Coeymans Ships	
2017	47
2018	47
2019	38
2020	37

Table 5: Historical POC Barge Traffic

Existing Port of Coeymans Barges	
2016	102
2017	95
2018	176
2019	106
2020	128

Comment: Hudson River barge traffic: The estimate for Hudson River Barge Traffic, cited on page 42 of the DEIS, was done in 2012. This estimate needs to be updated.

Response: Per the 2018 Ports and Waterways Safety Assessment, enclosed with the DEIS as Appendix 10.12 "Navigation Safety Risk Assessment", the Hudson River barge traffic remains 3,000± trips annually.

NYSDEC requested that the Project Sponsor provide an updated traffic analysis considering the significant reduction in exported material from the site and the resulting reduction in truck trips. The following narrative describing impacts to Transportation has been updated since the DEIS (originally Section 3.5 in the DEIS):

> The POC and CIP are existing active facilities, and therefore, there is existing truck traffic between the two. On average, there are currently 4 truck trips per hour crossing between POC and CIP. There is also an average of 5 off-road haul trucks per hour that do not cross at the intersection but instead use the LafargeHolcim haul road.
>
> The truck traffic for the POWI project will be associated with construction activities such as outgoing trucks for borrow / dredge material removal and incoming trucks for paving and other materials. Much of the materials and products will be delivered to and from the site via barge on the Hudson River which minimizes the number of heavy vehicles accessing the site on a regular basis. Off-road haul trucks and off-road routes, including continued use of the LafargeHolcim haul road, will be utilized as practicable. The type of truck traffic using the off-road routes and the LafargeHolcim haul road will be tri-axle trucks and trucks with the ability to be registered with a license plate consistent with

trucks currently using these travel routes. These trucks will comply with Section 385 of Vehicle and Traffic Law Article 10.

The proposed truck trips per hour were considered and analyzed in the TIAS. Since the initial analysis, the amount of cut proposed for the POWI project has been reduced to approximately 1.0 million CY from 3.7 million CY. This reduced quantity, along with the 156,000 CY of dredge material, will be primarily transported via off-road haul trucks to the adjacent sites contemplated in Section 3.1 "Land" in the FEIS. The revised grading plan in Appendix A yielded a reduction of approximately 2.7 million CY of material which translated to a reduction of truck trips by roughly 83% or a total of 25,685 trips across a 1.5-year construction period. This also allowed for truck trips to remain off-road. A summary of the total trips and associated material capacity is provided in Table 6.

Table 6: Construction Truck Trips[1]

	Previously Contemplated Trips			Estimated Trips		
Route	Trips per Day*	Cubic Yards moved per Trip	Cubic Yards Moved for construction period	Trips per Day*	Cubic Yards moved per Trip	Cubic Yards Moved for construction period
On-road	160	45	3,384,000 CY	N/A**		
Off-road	180	30	2,538,000 CY	55	45	1,156,000 CY

[1] The table summarizes previously contemplated truck trips for construction that were analyzed in the TIAS as well as the new estimated truck trips that will be required for the 1.5-year construction period. *Trips are based off 10-hour days. **Primarily off-road trips are being contemplated.

The ultimate breakdown of the type of trips used will depend on the demand for fill material and its destination, however, as previously stated, the Project Sponsor intends to focus removal efforts on off-road routes, including borrow transport to LaFargeHolcim and Powell sites.Per the off-site grading plan enclosed in Appendix A, the Powell property alone could take almost all the proposed borrow and dredge material. Areas where the LafargeHolcim property could accept fill are indicated in Figure 4 in this FEIS. Material transported to the LafargeHolcim property could be used for landfill cover, reclamation of areas used for aggregate operation, and quarry reclamation.

NYS Route 143 and NYS Route 144 are roadways specifically designated for heavy vehicle traffic. The TIAS recommends no capacity related mitigation for the POWI project as the study intersections will operate with acceptable levels of service throughout

the duration of the project. Additionally, representatives from the NYSDOT indicated at the July 29, 2021 review meeting that no restrictions for use of public roadways by legal vehicles would be recommended beyond the recommendations in the TIAS.

The reduced amount of fill does not change the conclusions in the TIAS that no capacity related mitigation is required. Regardless of these conclusions, the River Road/Coeymans Industrial Park Lane/Clayborn Place intersection is a wide expanse of pavement with little delineation on the Clayborn Place intersection approach for vehicles travelling to and from the Port of Coeymans. With closure of the northern Port of Coeymans driveway and reassignment of all traffic to the Clayborn Place access and increase in traffic associated with the subject project, it is recommended that roadway striping be provided on Clayborn Place at the intersection to clarify and delineate travel paths for vehicles entering and exiting the Port of Coeymans. The provision of lane striping, shoulder striping, stop bars and median striping will reduce potential confusion for drivers entering and exiting the site. Proposed striping will require coordination with the NYSDOT and must consider the vehicle size and type accessing the facility.

Additionally, vegetation clearing on the west side of River Road within the Industrial Park and the NYSDOT ROW, removal of an existing southbound intersection warning sign, clearing of vegetation to improve the visibility of the existing northbound intersection warning sign, and removal of the non-standard convex mirror on the east side of River Road is recommended as indicated in the TIAS, to improve the sight line from Clayborn Place and Coeymans Industrial Park Lane. It is noted that some mitigation measures require approval and permitting through review NYSDOT. Consistent with general practices, maintenance of roadway striping and signage or clearing / trimming and maintaining vegetation will be the responsibility of the roadway and / or parcel owner.

Businesses at the POC and CIP use best practices when determining preferred travel routes for heavy vehicle traffic. This includes avoiding travel through residential areas when possible and limiting the use of Jake Brakes. These practices, among others, will continue through the construction and operation of the proposed project. The POC will also install internal signage indicating that the route to the north on NYS Route 144 is the preferred truck route. These preferences will be communicated during site orientation for future offshore wind tenants and for contractors during site construction. Workers and tenants will be required to follow these best management practices through clauses in lease agreements and contracts for completing the POWI site improvements.

3.7 Visual & Aesthetic Resources

No public comments were received on the DEIS for visual and aesthetic resources.

3.8 Noise

Comment: Additional noise monitoring is needed in the Hamlet of Coeymans, along NYS Route 143, (Church St) and NYS Route 144 (Main St) and other residential areas in the Hamlet of Coeymans, especially on higher ground. Monitoring must be done when there is noise from the Port comparable to noise from the proposed POWI activity, especially the noise expected from the concrete batch plants.

Response: A residential receptor near the Hamlet of Coeymans was included in Appendix 10.9 of the DEIS as Location 5 in the Noise Assessment. Location 5 is on Stone House Hill Road, near NYS Route 144, and did not indicate any increase in ambient noise levels that would warrant mitigation during either the daytime or nighttime. The Noise Assessment included both construction and operation scenarios for the POWI project, which conservatively included operation of the two (2) proposed batch plants.

3.9 Historic & Archaeological Resources

Comment: All supporting evidence must be brought up to date, within the past two years. The approval by the New York State Department of Parks and Recreation and Historic Preservation must be recent and must address the issues raised after 2018.

Response: A letter from OPRHP dated May 2, 2022, indicates the project would result in no adverse effect on historic properties listed in or eligible for listing in the State and National Registers of Historic Places. A copy of the letter is included in Appendix C of this FEIS.

Comment: Page 73 of the DEIS refers to a letter of approval from OPRHP dated 2018. However, on page 1470, a letter dated February 21, 2020 notes that this 2018 letter was rescinded. There is also a letter dated January 31, 2019, from John Bonafide, OPRHP, to John Canon of the U.S. Army Corps of Engineers laying out a number of issues of concern to OPRHP.

Response: The 2018 Letter of No Effect was rescinded, however, as noted above, OPRHP issued a letter on May 2, 2022 which indicated the project would result in no adverse effect on historic properties listed in or eligible for listing in the State and National Registers of Historic Places.