



## Department of Health

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Commissioner

**SALLY DRESLIN, M.S., R.N.**  
Executive Deputy Commissioner

January 8, 2016

Hon. Kathleen H. Burgess  
Secretary to the Commission  
NYS Department of Public Service  
3 Empire State Plaza  
Albany, New York 12223

Re: CASE 14-F-02194 - Application of Lighthouse Wind LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 to Construct a 201 MW Wind Energy Facility

Dear Secretary Burgess:

New York State Department of Health staff reviewed the November 2016 Preliminary Scoping Statement for the proposal by Lighthouse Wind LLC to Construct a 201 MW Wind Energy Facility in the towns of Yates and Somerset in Niagara and Orleans Counties, New York. Please accept the attached comments. Thank you.

Please contact me (518-402-7800; [henry.spliethoff@health.ny.gov](mailto:henry.spliethoff@health.ny.gov)), if you have any questions.

Sincerely,

Henry M. Spliethoff, M.S.  
Research Scientist  
Bureau of Toxic Substance Assessment

Enc.

cc: Parties to Case 14-F-0485 (Via Electronic Mail)  
Mark Nash, NYSDOH

**New York State Department of Health Staff Comments on  
the November 2015 Preliminary Scoping Statement for the Lighthouse Wind Project  
January 8, 2016**

Page 18. The proximity of NYS Department of Environmental Conservation (DEC) program sites (e.g., brownfields, etc.) to the proposed project area is discussed. Mapping of “contaminated sites” is also discussed on page 23. It would be helpful if the locations of all sites in DEC remediation programs were presented on a map of the area surrounding the project study area.

Page 30, Section 2.4.3, 5th bullet. It is unclear whether these representative property lines and receptors are inclusive of or in addition to the six ambient baseline locations discussed on page 31.

Page 31, paragraph 2, line 3. The literature review of potential noise impacts should also address the potential of wind facilities like the proposed facility to cause “annoyance” among local residents.

Page 31, paragraph 4, line 1. It is not clear whether six noise monitoring locations will be adequate to characterize ambient pre-construction noise levels across the full range of possible relevant locations throughout the 24,000 acre study area. Please describe how the choices of monitoring locations (e.g., proximity to other noise sources) could impact conclusions about facility noise impacts and provide justification for limiting the proposed monitoring to six locations.

Page 31, paragraph 4. It would seem that ambient noise levels at relevant frequencies for a given location would be a function of wind speeds and directions over the course of the week of measurement. The application should include some discussion of the choice of monitoring weeks with respect to local wind patterns and potential effects on ambient noise measurements and conclusions about facility noise impacts.

Page 31, paragraph 4. Please provide more detail on possible “industry standard practices” to be used for noise monitoring and compare these practices with those recommended in recent reports or literature.

Page 31, paragraph 5. Please state whether cumulative noise from proposed turbines will be modeled.

Page 32, paragraph 2. Consider comparing modeled noise impacts to other recommended noise guidelines for health protection such as those from the World Health Organization <sup>1</sup>.

Page 32. Discussion of modeled noise levels and relevant local standards is confusing in that it does not clearly indicate whether discussed noise levels are inclusive of project noise, wind induced noise and ambient noise, or project noise alone. Please clarify.

Page 81, Section 2.1.3. The locations of Potential Environmental Justice Areas (PEJAs) are mentioned. It would be helpful if a map indicating the location of the PEJAs with respect to the study area is included in the application.

Reference:

1. WHO Regional Office for Europe. Night noise guidelines for Europe. (World Health Organization, 2009). at <<http://www.euro.who.int/en/health-topics/environment-and-health/noise/publications/2009/night-noise-guidelines-for-europe>>