

MEMORANDUM

To: Bryan Healy, Village of Croton-on-Hudson Village Manager
CC: Linda Whitehead, Village Attorney
From: Nick Vamvas
Date: November, 2021
Re: Hudson National Golf Club/Matrix Development, LLC – Solar Project – Public Comment Review
Project #: 82050.00

The following are our notes on various public comments regarding the installation of ground-mounted solar panels at the Hudson National Golf Club.

EMAIL AND VIEW STUDY FROM SUSAN EALER

Ms. Ealer prepared a view study roughly indicating the location of Hudson National Golf Club (HNGC) from various points along the Croton On Hudson Riverwalk. Her contention is that the site will be visible not just from Croton point but from many vantages along the Riverwalk. This is likely to be the case, but that does not mean the proposed array will have a significant impact on views in the area.

The New York State Department of Environmental Conservation's program policy titled "Assessing and Mitigating Visual and Aesthetic Impacts" notes that an impact occurs "when there is a detrimental effect on the perceived beauty of a place or structure." So, unless visitor's perception of the beauty of the Riverwalk is tied to the view of those 6.4 acres of trees (or 7.4 acres as noted in the Habitat Assessment) to be removed, then it's difficult to say there is an impact on the Riverwalk by the proposed project. Furthermore, the public resources along the Hudson River span an area roughly ½ mile to 1-1/2 miles from the proposed solar array. At those distances, visibility of the array will be minimal at best.

EMAIL FROM SHARON LAZAROV, NOVEMBER 7, 2021

Ms. Lazarov's email raises concerns about flooding on High Street of a stream that originates at HNGC. This stream will not be affected by the proposed solar array. Runoff from that area of the club discharges either to neighboring parcels on Albany Post Road or down Prickly Pear Hill Road through drainage structures that direct runoff toward Hudson River.

EMAIL FROM JOHN EALER, NOVEMBER 4, 2021

Mr. Ealer's email asks for clarity on the total count of trees to be removed. The proposed disturbance line has shifted since there were 587 proposed removals, specifically along Prickly Pear Hill Road. That shift appears to have decreased the number of removals needed. However, it appears the applicant may have included some trees in the "no impact >8" D.B.H." category that could be affected by the proposed site (i.e. within or very near the proposed disturbance limit line). The applicant should be asked to recalculate the tree removals and to clarify which trees were included in the study. Though presumed to be trees greater than 4" D.B.H., this was not clear in any of the documents reviewed by this office. This is also of concern for the habitat study. Trees greater than 5" D.B.H. could be suitable habitat for the Indiana Bat. Perhaps the tree count could be modified to include a category for trees greater than 5" D.B.H.

CONCERN OVER SEQUESTRATION OF GREENHOUSE GASSES

The applicant provided an exhibit titled “Hudson National – Matrix Environmental Offset Summary” compiled by Sea Bright Solar LLC. The summary utilizes the U.S. Environmental Protection Agency Greenhouse Gas Equivalencies Calculator and the U.S. Department of Energy’s Method for Calculating Carbon Sequestration by Trees in Urban and Suburban Settings. This is an industry standard tool used to quickly demonstrate the positive effect of the development of solar energy facilities. It appears the calculation was done on May 20, 2020. We have the following questions and comments on this summary:

1. Has the applicant submitted a copy of a draft or final interconnection agreement with ConEdison? Is the nameplate capacity of 1.86 MW going to be the final approved generation capacity? If not, please provide an updated calculation with the updated generation capacity.
2. Is the total electric production number based on the nameplate capacity or an actual production model?
3. If an electrical production model is used to determine the annual output, what assumptions are made on the loss of power generating capacity due to the age of the system? Wouldn’t the carbon sequestration in year 25 be less than that in year 1? It would be helpful to see the difference in the year 1 and year 25 values.