



December 17, 2024

Chair Frank Redl and
Members of the Zoning Board of Appeals
Town of Washington
10 Reservoir Dr.
Millbrook, New York 12545

***Re: Solar Installation Appeal Visual Impact Assessment, 5515 Route 82, Town of Washington,
Tax Map No. 135889-6666-00-434999-0000***

Dear Members of the Zoning Board of Appeals:

Studio A Landscape Architecture & Engineering, D.P.C. (Studio A) has been retained by Lisa Biase and Lou Casciano, owners of property located at 5515 Route 82 in the Town of Washington, who are experiencing severe visual impacts from solar panels installed off of Route 82 by August Madeline Fields LLC, the owner of Arcadia Fields ("Project Site"). Their concern is the location of the panels and power pole because as they exist, the panels and pole cannot be fully screened in accordance with Town of Washington Zoning Code ("Zoning Code") §§ 165-60(F)(3)(c) and/or 165-60(F)(4)(c), which requires 100% screening of the solar panels to any adjacent property at all times.

As such, Studio A has reviewed the existing conditions of the Project Site, material provided by the Town's Building Department pursuant to a Freedom of Information Law ("FOIL"), which included a proposed planting plan prepared by iSun, dated May 20, 2024 (the "Site Plan"). Studio A has also reviewed the following submissions made to the Town of Washington Zoning Board of Appeals ("ZBA") by Lisa Biase and Lou Casciano, including:

- 1) August 16, 2024 ZBA Appeal and related exhibits;
- 2) November 14, 2024 ZBA Appeal supplement and related exhibits; and
- 3) December 13, 2024 ZBA Appeal supplement and related exhibits.

("ZBA Materials").

Based on our review of the ZBA Materials, it is evident that the solar panels are not effectively screened by the landscaping proposed on the Site Plan nor, given their location, it is very likely that the solar panels will never be %100 screened. Further, there is clearly no amount of landscaping that could ever effectively screen the new utility pole constructed adjacent to Ms. Biase and Mr. Casciano's property.

Below are the main reasons why screening according to the proposed landscaping fails:

- 1) The Project Site is approximately 400 acres. A review of the Project Site on GIS systems easily indicates several locations that are well away from Ms. Biase and Mr. Casciano's property and other adjacent neighbors and would provide full screening of the solar panels. The solar panels should be relocated to ensure all adjacent properties do not see the solar panels. Underground trenches can be dug to provide necessary cables to connect to the utility grid.
- 2) The developer has proposed the "re-location" of 18 mature Norway Spruces between 8 feet and 15 feet in height and 16' O.C. from each other. Importantly, these trees are noted as being noted as "moved." The use of existing vegetation and the relocation of the same will ensure that the solar panels will be continuously seen from Ms. Biase and Mr. Casciano's property. The relocation of existing plantings will result in varying growth rates (including at the time of planting), creates gaps allowing the panels to be seen from adjacent properties, may be diseased, and do not meet the American Nurseryman Association Standards. They can also have been impacted during the replanting, which may inhibit their growth.
- 3) Norway Spruce is estimated to grow to approximately 40-60' based on growing conditions. Planted at 16' O.C., these plantings are about 50% too close together to be able to effectively grow to their full width of approximately 20-30' wide. Additionally, they are only capable of growing, under ideal conditions, approximately 1-1 ½ feet per year in height. This way the landscaping is proposed will not 100% screen the solar panels from the adjacent residences. The Town must undergo a viewshed study to determine if solar panels could ever be screened at all times from the neighboring parcels.
- 4) Studio A has a long history of providing visual simulations for companies developing solar installations along with preparing the planting plans for effective buffering of these developments. As such, a single row of evergreens will never provide 100% screening from adjacent properties and is contrary to industry standards.
- 5) There are topographic differences between the Project Site and adjacent parcels. This was never reviewed by the developer or the Town in preparing their landscape plan. Instead, the developer has taken down existing vegetation along Route 82 increasing the view of the solar panels from Ms. Biase and Mr. Casciano's property.
- 6) Studio A performs visual impact assessments in conformance with procedures and methodologies established by the Adirondack Park Agency "Visual Analysis Methodology" which is the most comprehensive regulation in the State for preparing visual assessments due to the visual and environmental sensitivity of the resources in the Park. These procedures are always customized by Studio A to relate specifically to the nature of the proposed project components and landscape context in which they occur. In performing this, Studio A evaluates the proposed conditions in relation to the existing and proposed topography, existing and proposed vegetation, viewers angle of visibility, duration of view, and other site conditions which are part of the viewshed. This is accomplished by preparing a cross-section from the vantage point(s) of concern to the proposed solar panels.

Based on the information reviewed, it appears that this assessment – or any assessment for that matter -- was never conducted by the developer.

Therefore, as a matter of preliminary observation, the angle of view to the solar panels directly across from Ms. Biase and Mr. Casciano's residence, as well as the developer's removal of the existing scrub and hedgerow vegetation along Route 82, together with proposing a completely ineffective planted buffer adjacent to the solar panels, means that Ms. Biase and Mr. Casciano (as well as other neighbors) will continuously be burdened with views of the solar panels without intervention by the Town. These conditions should have been taken into account by the Town before providing an approval of the installation in that they are vital components of visual impact analysis and were obviously overlooked.

Yours truly,

A handwritten signature in cursive script that reads "Kirsten Catellier".

Kirsten Catellier, RLA

President

for

Studio A Landscape Architecture & Engineering, D.P.C

KIRSTEN A. CATELLIER, RLA, CLARB, ASLA

PRESIDENT



BACKGROUND

Kirsten A. Catellier has experience in all scales of site development, planning, and environmental impact analysis. Her professional practice has been focused in master planning, resorts, parks, urban districts, and waterfronts. Her design philosophy brings a unique perspective by following principles of understanding natural systems, peoples' needs, and technical innovations.

PROJECT EXPERIENCE

Word of Life Bible Institute Campus Master Plan & Implementation of Projects (NCAA)
Artificial Turf Soccer Field, Dormitories, & Welcome Center | Pottersville, NY
WOL Master Plan & 166 Bed Dormitory | Hudson, FL
SUNY Morrisville Shannon Hall Demolition & Site Work | Morrisville, NY
Cornell Life Sciences Research Pavilion | Ithaca, NY
Saratoga County Airport New Hanger and Terminal Site Work | Saratoga Springs, NY
Capital Improvement Projects (LaFargeville CSD, Chazy UFSD, Beekmantown CSD, General Brown CSD, Hammond CSD)
Saratoga Race Course Saddling Shed and Dormitories | Saratoga Springs, NY
Pitney Meadows Community Farm Trails Master Plan | Saratoga Springs, NY
Capital Roots Urban Grow Center Phase 2 Expansion | Troy, NY
Mt. Van Hoevenberg Sports Complex Site Transformation | Lake Placid, NY
Village of Tannersville, Gooseberry Creek Revitalization Phase II | Tannersville, NY
K-1 Base Lodge Re-Imagined | Killington Resort, VT
Conversion of Historic Huck Finns Warehouse | Albany, NY
Camp Simcha, a Project of Chai Lifeline, "Teen" Campus Master Plan | Port Jervis, NY
Base Camp at Bear Mountain | Killington, VT
Lake George Park Commission Office & Battlefield Park Visitor Center | Lake George, NY
West Mountain Ski Area Base Lodge Renovations & North West PUD | Queensbury, NY
Albany County Nursing Home Expansion & Additions | Colonie, NY
Albany County Sheriffs Public Safety Building | Clarksville, NY
Cherry Street/Marvin Alley Townhouses | Saratoga Springs, NY
Evergreen Academy Master Plan | Glen Wild, NY
Seagle Music Colony Master Plan and Implementation | Schroon Lake, NY
Artisanal Brew Works | Wilton, NY
River Trail Brewing Company | Saranac Lake, NY
Moreau Animal Clinic | Moreau, NY
New Leaf Headquarters | Claverack, NY
NYRA Oklahoma Training Track Tree Disposition & Facilities Tree Plan | Saratoga Springs, NY
Fort William Henry Hotel & Conference Center Renovations | Lake George, NY

EDUCATION

Bachelor of Landscape Architecture, SUNY College of Environmental Science and Forestry- Syracuse, NY

REGISTRATION

New York #002714
Vermont #125.0133717
Florida #6667637

PROFESSIONAL ACTIVITIES

American Society of Landscape Architects, Current
NY Upstate Chapter-ASLA, Current
NY Upstate Chapter-ASLA VP of Communications, Current
Saratoga Hospital Foundation Board of Trustees, Current
ASLA SKILL|ED Practice Management Institute Committee Member, Current
ASLA Women in Landscape Architecture PPN Leadership Team, Current
CLARB Certified Landscape Architect, Current
Future City Judge - 2018 to present
NY Upstate ASLA Eastern Section Chair - 2018-2022
Speaking Engagement - Warren Co. EDC Planning & Zoning Forum Opening Session 10/2018
Speaking Engagement - ASLA National Conference, "Beyond the Bollards" 10/2018
Juror- PA/DE ASLA Chapter Awards 4/2019
Juror- Indiana ASLA Chapter Awards 7/2020
Juror- Tennessee ASLA Chapter Awards 03/2022
Juror- Wisconsin ASLA Chapter Awards 03/2024
Albany Business Review 40 Under 40 Class of 2023
ASLA SKILL | ED 2023 Business Development Participant
Albany Business Review Bizwomen Mentor Monday Mentor 2024