

April 12, 2023

ATTN: Mayor Vescio & Board of Trustees
Village of Briarcliff Manor
1111 Pleasantville Road
Briarcliff Manor, NY 10510
Tel: (914) 944-2723

Habitat Impact Memo
Briarcliff Solar LLC

To whom it may concern,

I am writing this Habitat Impact Memo as the professional wildlife habitat surveyor who has visited the Briarcliff Solar site to investigate the wildlife habitats on site. After reviewing the latest Briarcliff Solar drawings dated April 4, 2023, I have determined that the proposed tree removal and project has been designed to minimize impacts to the extent practicable to the existing environment, wildlife, and wildlife habitats on and around the site. It is EA's opinion that the project will not have any substantial adverse effect on habitats or species populations within and surrounding the project site area.

EA's findings characterizing the site habitats (Appendix A) comply with standard industry protocols that provide guidance for identifying wildlife and their habitats. In September, 2022, I conducted a site habitat assessment for wildlife species that are either New York State or federally listed threatened or endangered species or that are State "species of special concern." The findings in the report stated that there were no protected wildlife species identified for the site by either of the federal or state wildlife agencies that were queried. In our professional opinion, the habitat alterations resulting from the development of Briarcliff Solar will not impact any species population as a whole.

I have reviewed the Project's SEQR FEA Part 2.7.a through 2.7.j and recommend that several of the impacts assessed as "moderate to large" should more appropriately be assessed as "No, or small impacts" in consideration of relevant information provided to Project staff from both the NYSDEC Natural Heritage Program and the USFWS Cortland, NY, field office. The correspondences provided by those two offices indicate that the project will have no impact on the habitat of any threatened or endangered species. These several agency determinations include the following communications:

- Heidi Krahling, Environmental Review Specialist, from the NY Natural Heritage Program confirmed that there are not any known records of rare or endangered species, or significant habitats, at or in the vicinity of the proposed project site, so further action involving NYSDEC Natural Heritage is not necessary (Appendix B).
- Additional correspondence with the Region 3 Wildlife department at NYSDEC further confirms the findings from the Natural Heritage Program. On May 10th, 2022, Lisa Masi, Senior Wildlife Biologist at the Region 3 Field Office provided a response email (Appendix

C) to YSG's notification letter about the project, stating "no impacts to these species are anticipated and a NYSDEC endangered and threatened species permit will not be needed. The FEAF also indicated no ETS are known on the project site."

- On May 11, 2022, YSG conducted a virtual meeting with Sandra Doran and Tim Sullivan, Biologists at USFWS New York Ecological Services Field Office to review the IPaC Official Species List for the Project generated through the USFWS website. The Official Species list, Biological Assessment and determination was generated and submitted to the USFWS NY field office and on May 17th, 2022 the project received a letter from Ian Drew, USFWS Acting Field Supervisor, in agreement of the "no impact" determination (Appendix D).

In consideration of the preponderance of these agency determinations and with regard to the assessments presently made in FEAF Parts 2.7.a through 2.7.d that have been marked as actions that may have "Moderate to large" impacts on "rare, threatened or endangered species," EA suggests that these four FEAF items should be reassessed as having "no impact" as the cited correspondences from the relevant state and federal wildlife agencies have determined that the Project will have no impacts to such species as no such species are expected to be present at or in the vicinity of the Project site.

Additionally, FEAF Part 2.7.g is marked as an action that may have "Moderate to large" impacts that may "substantially interfere with nesting/breeding, foraging, or over-wintering habitat for the predominant species that occupy or use the project site." EA believes that the Project would have "No, or small impact" as there is no area of critical habitat identified by the state and federal wildlife agencies for any of the species that might be present on this site. Therefor there are other areas within the region that would provide these habitat opportunities for any such wildlife species that might be displaced from the Project site.

Sincerely,

/s/ Bruce R. Friedmann

Bruce R. Friedmann

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