



Village of Croton-on-Hudson
Conservation Advisory Council

Van Wyck Street
Croton-on-Hudson N.Y. 10520

Janet Monahan
Council Chair

December 8, 2021

Dear Mayor Pugh, Trustee Gallelli, Trustee Horowitz, Trustee Rosales, Trustee Simon and Village Manager Healy,

This is the Village of Croton-on-Hudson Conservation Advisory Council's position statement on the special permit application to install solar arrays on the Hudson National Golf Course property.

Summary Statement

The Conservation Advisory Council (CAC) has considered the current proposal by Hudson National Golf Course (HNGC) and its affiliated developer (Matrix) to place solar arrays on HNGC property. The CAC recognizes that there will always be tradeoffs in installing solar arrays. They must go somewhere in order to work, and everyone may not agree on any given proposed location. Below we elaborate on these issues in order to provide the Village Board and others insight into our final position. **In this case, the CAC strongly believes the problems associated with developing protected land that includes steep slopes and trees, along with the habitat and services they provide, outweighs the potential production of clean energy by the proposed arrays and thus does not support the application.** This was indicated by the fact the majority of the council voted against the proposed arrays on 11/18 (5-1) and again on 12/8/2021 (6-0, when this statement was approved and in consideration of new documents related to the project provided between both dates). However, we wish to make it clear that the CAC supports solar energy in appropriate areas.

Rationale

We note that the proposed arrays would produce large amounts of clean, renewable energy (estimated to represent approximately 77% of HNGC consumption or the average yearly usage of 287 homes). This clean energy has the potential to reduce carbon dioxide that would be released into the air in amounts equivalent to planting 70,000 tree saplings or 2200 acres of forest (according to estimates provided in the proposal).



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The CAC believes that supporting the growth of green energy is essential to the long-term health of Croton-on-Hudson and the rest of the world. Increased concentrations of carbon dioxide, along with other greenhouse gasses, are the major drivers of the current climate change crisis. The energy budget calculations based on carbon reductions alone have been noted as the main benefit of this proposal. Increased temperatures, changes in precipitation, rising seas, and acidified waters are just some of the related threats included in climate change. Even threats that do not directly impact Croton-on-Hudson indirectly influence the Village's ability to preserve and enhance the natural components of our landscape and ensure their biologic integrity. As a result, attempts must be made to *both* sequester carbon dioxide that has already been released into the atmosphere and reduce continuing emissions.

However, the installation of these solar arrays does not come without costs. The proposed site is an ~15 acre area (of which ~ half would have trees removed) that has already been set aside for preservation (thus the current request before the board to allow development). Losing this land would set a bad precedent. The CAC does not believe we can continuously lose existing green spaces and mitigate (explicitly or implicitly) these impacts elsewhere. Mitigation efforts face issues in replacing time - how do we value the fact the protected acres have already begun to mature? - in addition to issues with ensuring spaces chosen for mitigation truly replace the existing property. Loosening restrictions on land that has already been placed under protection reduces the Village's and residents ability to plan for long-term green space coverage and maturation.

Beyond issues associated with the currently protected status of the land, the proposed installation would require the removal of 581 living trees. Many of these (>400) would require a removal permit given their size alone (>8 in dbh, per Village Code). However, the overall number may be greater given the proposed arrays would be installed on a steep slope (application notes 33% of the proposed area has a slope of greater than 15%, with large amounts occurring on slopes greater than 35%). Removal of trees always raises concerns, but the loss of such a number on a steep slope suggests erosion and stormwater issues may accompany the installation. Although efforts have been made to ensure these impacts are minimal, the current Village stance is that slopes should only be disturbed when



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“no practicable alternative to such disturbance exists.” In this case the Village has a practicable alternative - the Board can say no to this application and pursue supporting solar panel installation on already developed areas.

Other issues that have been raised regarding the installation are aesthetic and hydrologic impacts. These issues, especially in relation to the original application, have been noted by other Village committees (e.g., the Waterfront Advisory Committee, the Planning Board) and the company (Chazen) the Board selected to review the application. While the most recent updates to the application address many of the hydrological impacts of the project, the aesthetic issues still remain, though we note their scope and scale are contested and will differ among village residents.

Overall, we believe the decision to approve the installation of the solar array (or not) must be based on more than carbon dioxide impacts. While these benefits strongly favor the installation of the arrays, the current land offers other benefits beyond carbon sequestration, such as a biodiverse mix of mature trees, soil protection, and habitat for animal life. Most importantly, not maintaining the protected status of the land also raises issues regarding how committed Croton is to adhering to its stated goals regarding green spaces, tree removal, and steep slope protection. These are the issues the Board must weigh in considering the application.

Thank you,
Croton Conservation Advisory Council
Janet Monahan, Chair
Stephen Gosnell
Bruce Laemmel
Carl Grimm
Eva Thaddeus
Terrence McGarty
Anthony Magardino