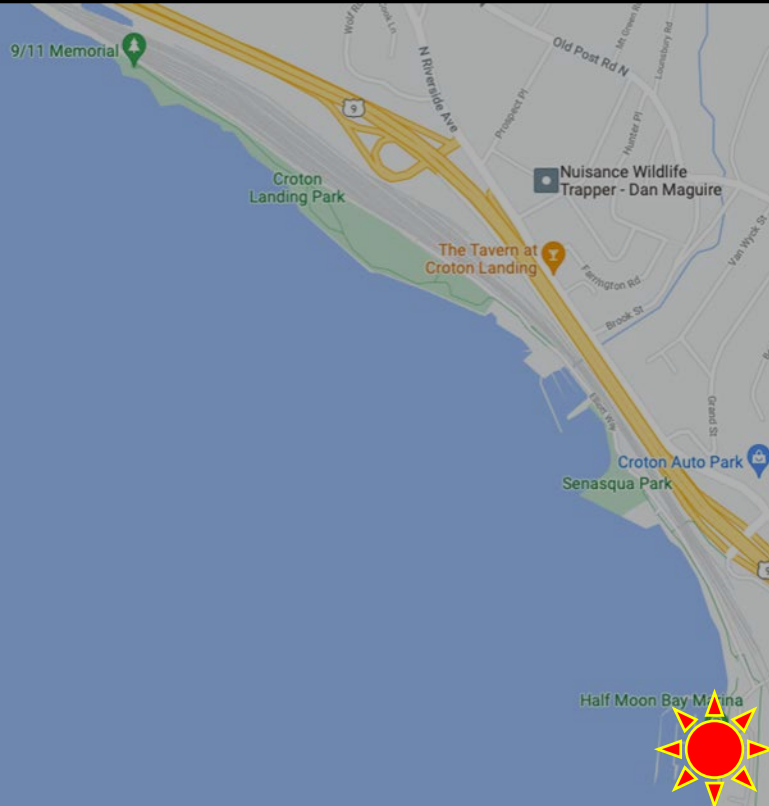


# View Study: Proposed Hudson National Solar Field

As Seen From:  
Croton on Hudson  
Riverwalk

**General Location  
of Proposed  
Solar Field**



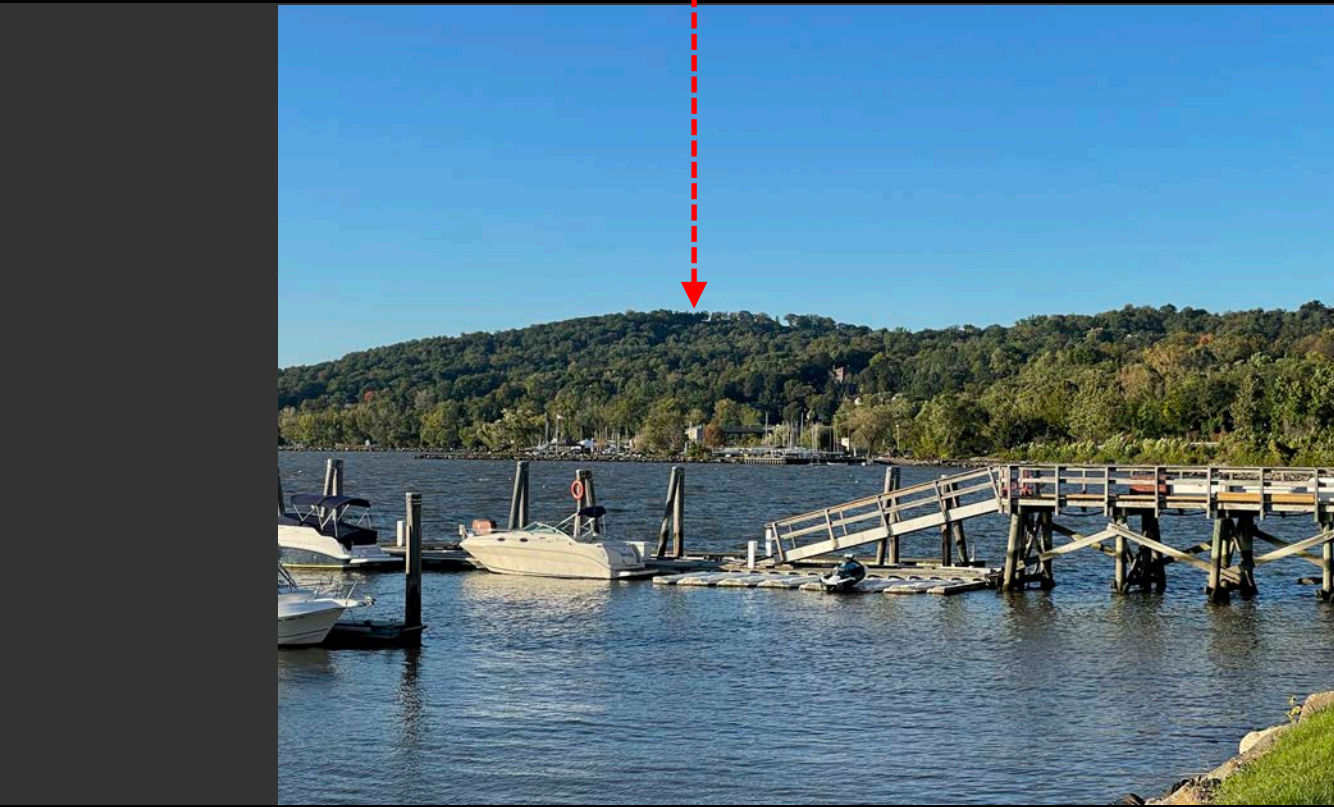
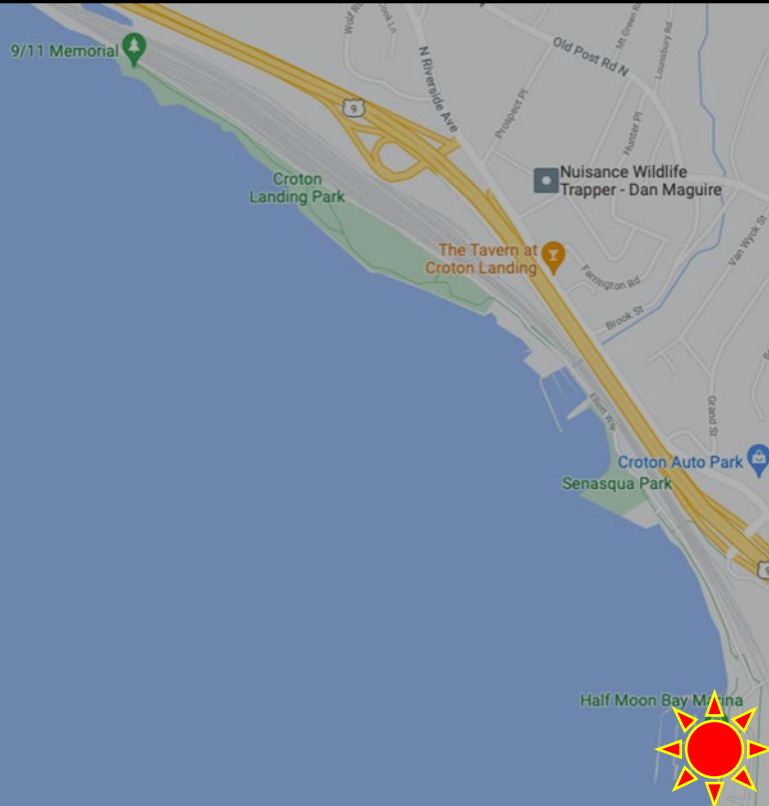
**Map:  
Croton On Hudson Riverwalk**

**Vantage Point: Half Moon Bay**

**View:  
Proposed Hudson National Solar Field**

**From: Half Moon Bay**

**General Location  
of Proposed  
Solar Field**



**Map:  
Croton On Hudson Riverwalk**

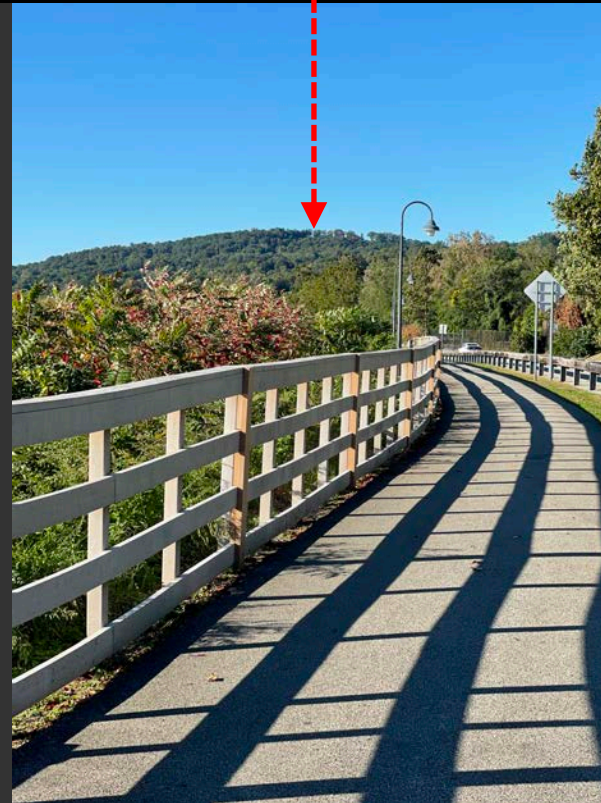
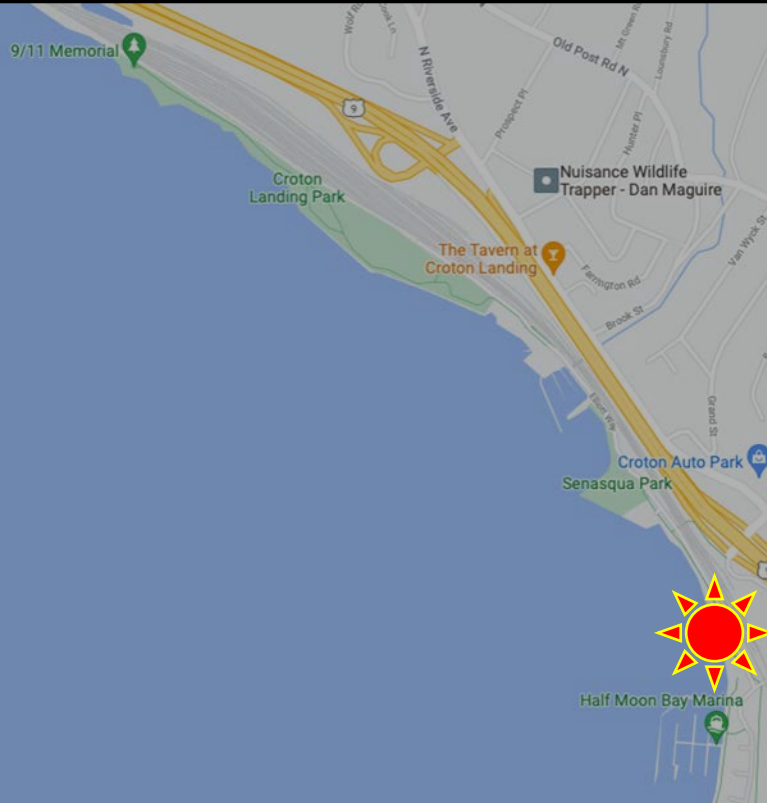
**Vantage Point: Half Moon Bay**

**View:  
Proposed Hudson National Solar Field**

**From: Half Moon Bay**



**General Location  
of Proposed  
Solar Field**



**Map:  
Croton On Hudson Riverwalk**

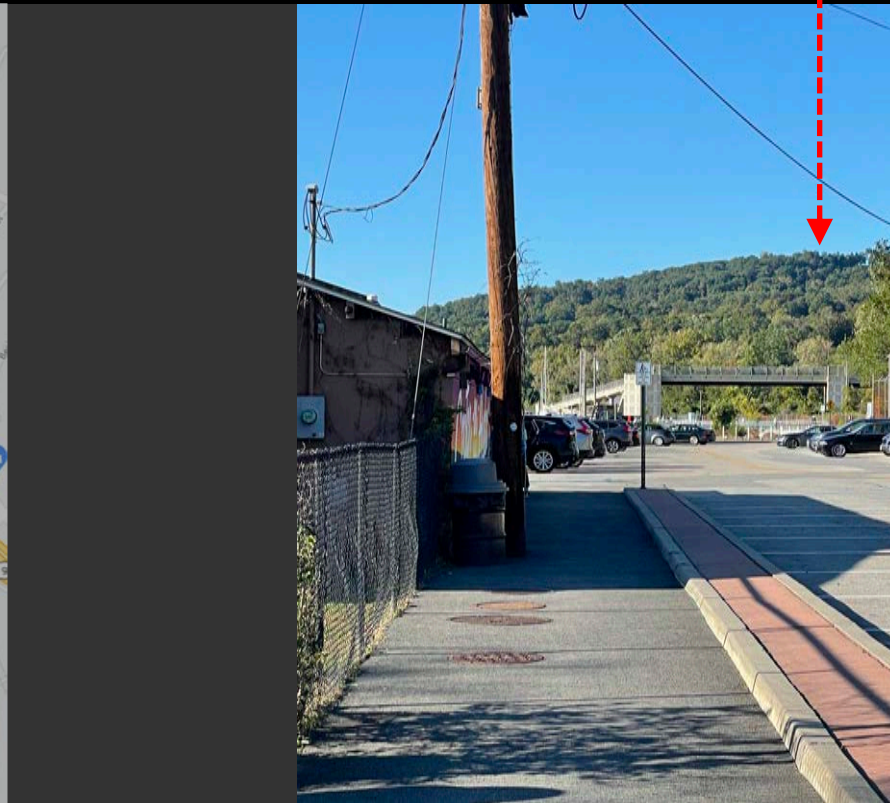
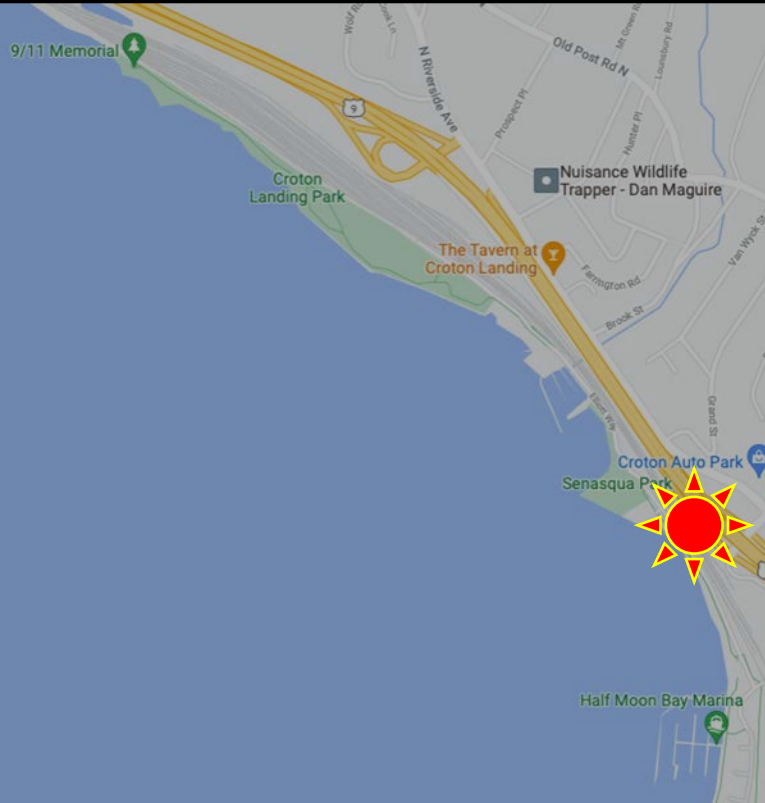
**Vantage Point: Riverwalk Trailhead**

**View:  
Proposed Hudson National Solar Field**

**From: Riverwalk Trailhead**



**General Location  
of Proposed  
Solar Field**



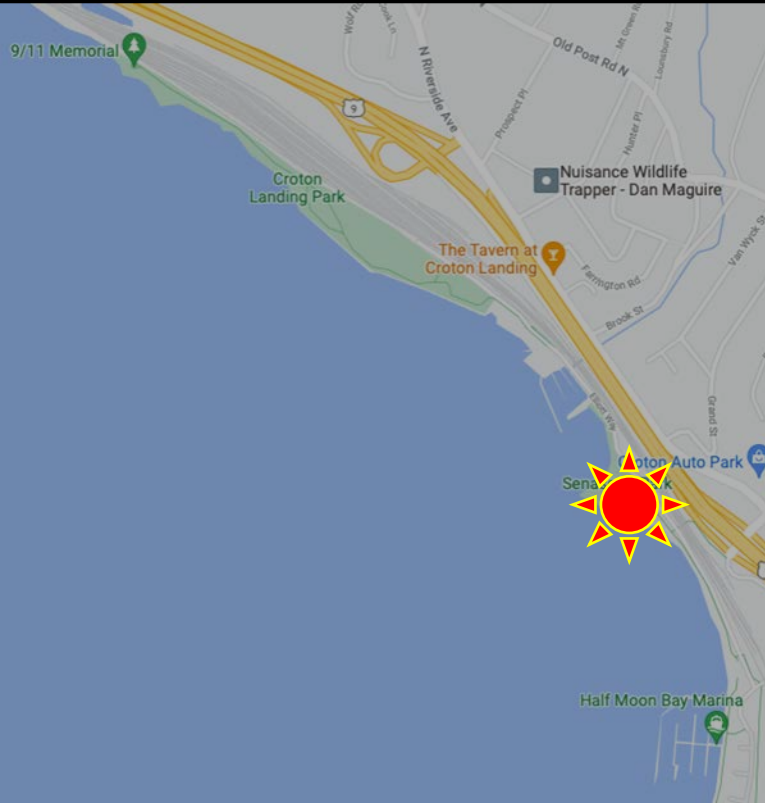
**Map:  
Croton On Hudson Riverwalk**

**Vantage Point: Senasqua Park Car Lot**

**View:  
Proposed Hudson National Solar Field**

**From: Senasqua Park Car Lot**

**General Location  
of Proposed  
Solar Field**



**Map:  
Croton On Hudson Riverwalk**

**Vantage Point: Senasqua Park Pavilion**

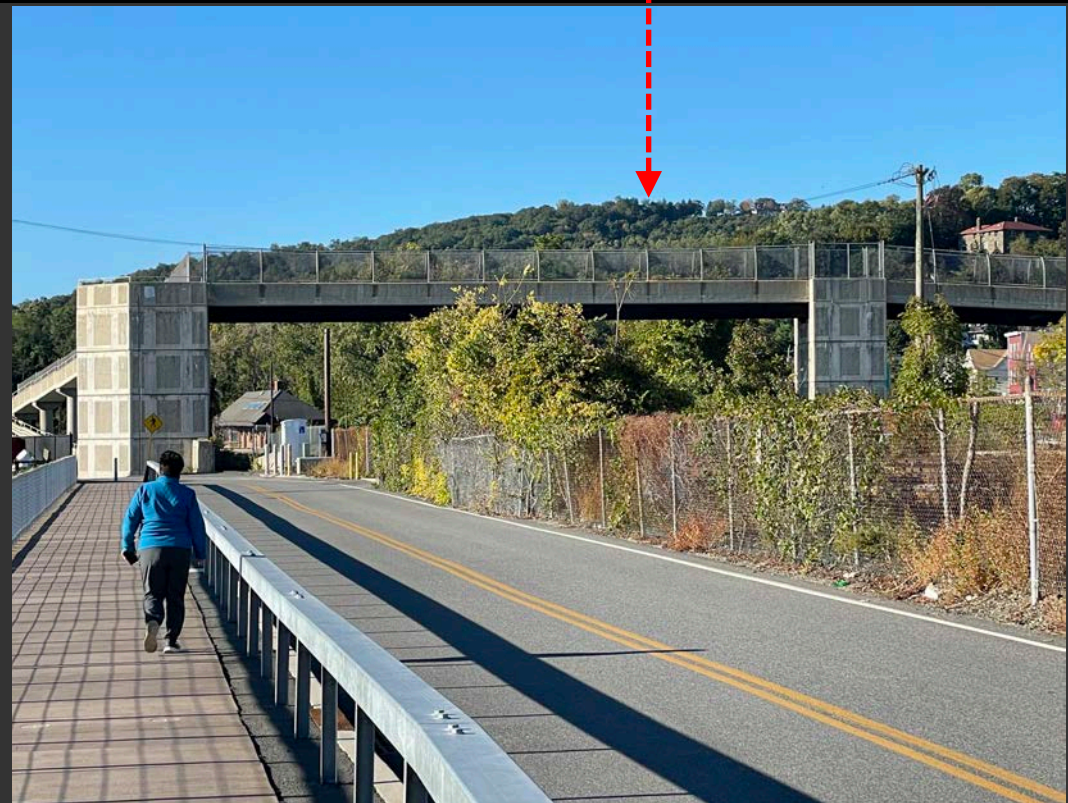
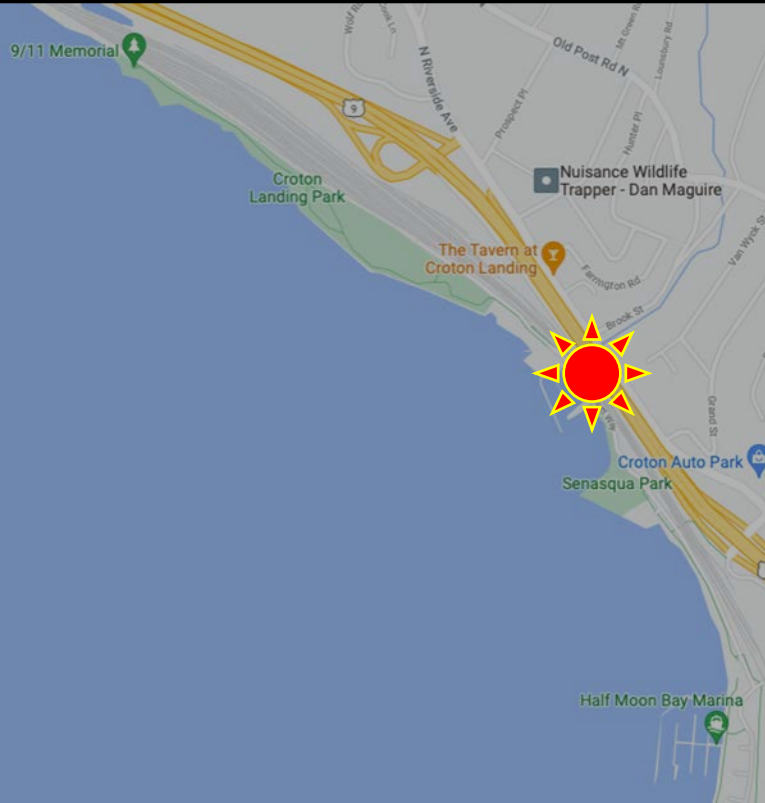


**View:  
Proposed Hudson National Solar Field**

**From: Senasqua Park Pavilion**



**General Location  
of Proposed  
Solar Field**



**Map:  
Croton On Hudson Riverwalk**

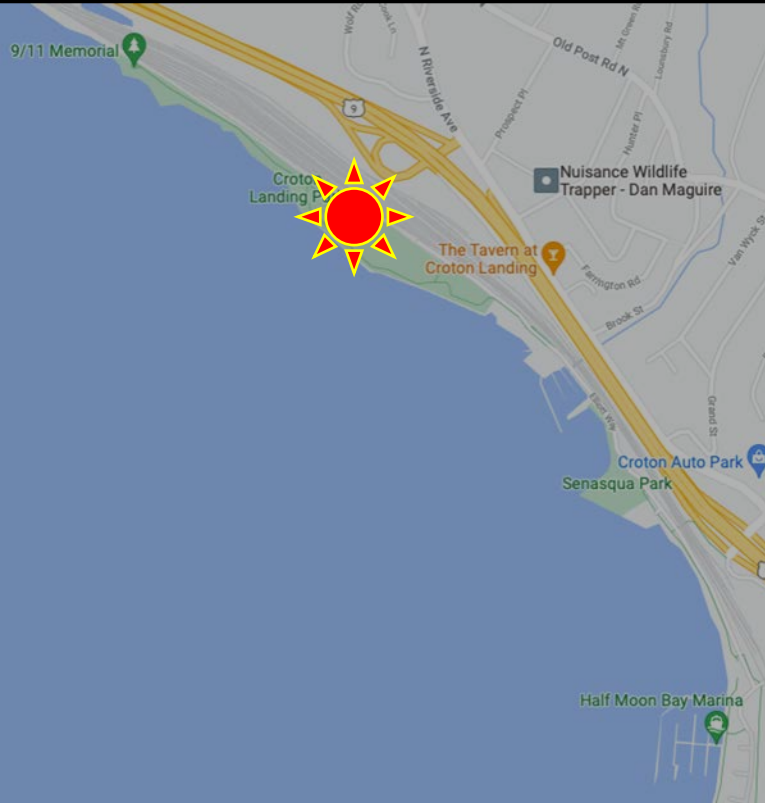
**Vantage Point: The Crossining**

**View:  
Proposed Hudson National Solar Field**

**From: The Crossining**



**General Location  
of Proposed  
Solar Field**



**Map:  
Croton On Hudson Riverwalk**

**Vantage Point: Croton Landing Park**

**View:  
Proposed Hudson National Solar Field**

**From: Croton Landing Park**

October 25th, 2021

The Honorable Brian Pugh, Mayor  
& Village Board of Trustees  
Village of Croton-on-Hudson  
1 Van Wyck Street  
Croton-on-Hudson, NY 10520

Dear Mayor Pugh and Village Trustees,

Last Monday night October 18th, I spoke at a village board public hearing at which I read a letter appealing to the Village Board to deny Hudson National Golf Course's application for their proposed solar panel project.

As I stated then, I am not opposed to solar energy or more panels being installed here in Croton, but I have very strong opposition to the prospect of removing almost 600 trees on steep slopes above my and my neighbors' residences.

When I spoke, I was quite irate about many of the dismissive and disingenuous comments made by the representatives of the golf course and the developer. This week, I dug more deeply into the documents posted on the village website, and read insightful social media comments on this issue (and others related to un-neighborly HNGC activities). I also spoke with neighbors and other Croton residents. I am now even more appalled at the prospect of this project being approved.

In examining the documents posted on the Village website, (which I believe are not complete), I am particularly focused on The Village Waterfront Advisory Committee comments of 2/4/21, and Mastomonaco's responses (2/15/21) to the Chazen Companies *Comments on the Applicants SWPPP (2/8/21)*.

In the Waterfront Advisory Committee memo, they approval is contingent upon significant changes to the Coastal Assessment Form. In addition to concerns about runoff into coastal waters, flow, and scenic considerations, they call for addressing the following:

*The WAC members reviewed the policies in the Local Waterfront Revitalization Program (LWRP) and believe that the following policies are applicable to this referral and the proposed action is consistent with the policies **except as noted in the specific policies:***

*Policy 11A: Erosion and sediment control measures shall be undertaken in order to safeguard person, protect property, prevent damage to the environment, and promote public welfare by guiding, regulating and controlling the design, construction, use and maintenance of any development or **other activity which disturbs or breaks the topsoil or results in earth movement.***

*Policy 14: Activities and development, including the construction or reconstruction of erosion protection structures, shall be undertaken so that there will be no measurable increase in erosion or flooding at the site of such activities or development or at other locations.*

The WAC then calls for a SWPPP to be submitted to the Village's consulting engineer and the Village Engineer prior to obtaining a special permit.

*The SWPPP shall address erosion and sediment control measures and the mandated items as well as address the concerns about drainage voiced by neighboring property owners on Prickly Pear Road. In addition, a steep slope permit will be required to address potential erosion and flooding and the steep slope issues...**the applicant noted that a vegetative cover will be planted underneath the proposed solar panels.***

In essence the WAC voices concerns and calls for a complete SWPPP.

In Mastromonaco's SWPPP of January 20, 2021 he outlines the various watersheds involved in the project. I am particularly concerned about the area for proposed Solar



Array #1, where watershed designated “F” of 10.43 acres sits directly adjacent and abuts my neighbor’s backyard property. Proposed Solar Array #1 is mostly in this “F” watershed. (See attached)

Based on the topographic map submitted with the SWPPP, the area of the proposed Solar Array #1, drops from 420’ elevation to 320’ within watershed “F”, and possibly more, as a full topographic map is not provided. This is the height of a 7 story building. That’s pretty much three times the height of the Village’s municipal building. On page 8 of the SWPPP he addresses aspects the various watersheds but does not specifically address anything about watershed “F”. Mastromonaco states that watershed “E” collects water from “A” and “runs as sheet flow to Prickly Pear Road.” So what of the runoff within “F”? Presumably it runs down the back of my neighbor’s property at 1271 Albany Post Road, and down our common driveway.

On page 3 of the SWPPP he notes “the Matrix project will install solar panels on an area of slopes ranging up to 20%, but in the submission documents we see that not only are **steep, very steep and extremely steep slopes** involved but the largest percentage of the project is in “extremely sloped” designated areas.

The SWPPP goes on to say *“the DEC recognizes that elevated solar panels do not increase the imperviousness of the watershed since rainfall is returned to the ground surface throughout.”* This makes sense but it does not address the concept of taking down mature trees on steep slopes and disrupting the natural canopy and root structure that will absorb and disperse this water.

The most disturbing thing that I have found in the posted documents about the project is the Mastromonaco response to the Village’s Consulting engineer’s review of the proposed SWPPP. (See attached) In what appears to be a blatant disregard for Post Construction Treatment he states in large type and bold letters, **“NO POST CONSTRUCTION TREATMENT REQUIRED”** indicating that this is based on the fact that they have removed gravel paths from the site plans. Basically they are saying they’ll adhere to construction guidelines, hay bales, silt fences, inspections etc, but what happens later is any body’s guess. Planting some evergreens as a visual buffer is not remediation for the removal of almost 600 trees – on steep slopes!

This response document exhibits a dismissive disregard for many of the important points that your hired engineer, Chazen points out. So unless I am missing something, I am very troubled that I don't see anything from the Village Engineer's office, the Board, or Chazen neither addressing nor challenging various aspects of the Mastromonaco response statements.

Where are the Chazen responses to the Mostromonaco review? Whose job is it to carefully review and analyze the documents and advise the Village Board and citizens about the real effects of this proposed development?

There were a few statements made by the applicants at the meeting that were clearly disingenuous, particularly the photos that Matrix promoted as viable projects they did in the past. I applaud their success, their mission and the efforts, but these sites were obviously on relatively flat grasslands or farms, certainly not steep slopes!

Surely you don't need to be an hydrologist to know that taking down these trees on steep slopes will lead to erosion. In this morning's news of the rains in California and resultant erosion and mudslides we are reminded just how dangerous denuding a landscape can be, especially in light of the changing climate and unusual rainfall and weather patterns. Look at what tropical storm Ida did just recently. What comes next, another Ida, another Sandy? How will these affect impending erosion?

We hope to avoid any future legal action due to damages resulting from your decisions on this matter. It behooves the Village Board to direct Hudson National Golf Course to place their proposed solar arrays in a less environmentally disruptive site.

Sincerely,

Steve Varvaro & Beddy LoBalbo Varvaro

Attachments Included:  
Site & Topographic Maps Provided by HNGC and Matrix LLC

**JOHN EALER**  
5 PRICKLY PEAR HILL ROAD  
CROTON-ON-HUDSON, NY 10520

Dear Mayor Pugh, Manager Healy and the Board of Trustees,

I look forward to the opportunity to speak to you this evening at the Public Hearing about the Proposed Solar Energy Project at Hudson National Golf Club.

Solar power is, of course, a desirable source of energy and I welcome HNGC's initiatives to produce clean energy for the community.

I also welcome the time and attention the Board of Trustees, the Planning Board, the Mayor, and the Village Manager have already invested in the town's solar efforts, including this project and the solar project at the train station.

My position is that a project like the one proposed by the Golf Course – one that will, by all accounts, disrupt the integrity of one of the largest, oldest forest ecosystems in the village – can and should be approved only if there is beyond a shadow of the doubt that it will create a net ecological and environmental gain to the community.

As the Lead Agency under SEQRA, the Village Board has a responsibility for exceptional due diligence in this matter thanks to the sensitivity of the ecosystem involved. As our community stated via our lawyer's letter on February 8, 2021 (re-attached, following this letter), the most reasonable next step is a PosDec of environmental impacts and a subsequent Environmental Impact Statement. The most critical passage of the letter is this one:

*SEQRA requires that the Village take a hard look at the environmental impacts of a proposed project. In order to do that you need accurate information about the project. The Club filed a short form Environmental Assessment Form which was inaccurate but also woefully inadequate for you to make the determinations you need to make. Based on that form you designated the action as Unlisted under SEQRA. Given the nature of the projects and the impacts therefrom this should have been designated a TYPE 1 action. At the very least the applicant should be required to submit a Full Environmental Assessment Form which will provide more detailed information upon which you can make a determination of significance. That determination should be a positive declaration necessitating a Draft Environmental Impact Statement.*

The Village's own committees, in their own due diligence, have already flagged the problematic impacts of this project that concern our community.

On February 4, 2021, the Waterfront Advisory Committee, in their letter to you (quoted below), updated the golf course's submission to correctly indicate the broad array of impacts the project will have.



As you know, the WAC has left the question to you, whether the removal of almost 600 mature trees is consistent with point 25 of the LWRP (emphasis mine):

*The applicant pointed out that when the golf course was built, the concern for the scenic quality was at the ridge line and the removal of the trees for the solar matrix project does not impact the ridge line. The applicant also pointed out that during the summer, there will be leaves on the existing trees and claimed the panels will not be visible to the viewer from other locations in the village (e.g. Route 9, Croton Point Park, Pedestrian Bridge).*

*However, the WAC expressed concerns as to whether or not the project is consistent with these policies given the number of trees (587) being proposed for removal. After discussion, the WAC determined that they could not definitively recommend consistency and therefore, it would be up to the Village Board to determine consistency with the above policies.*

Since Prickly Pear Hill is of unique visual value to Croton – a viewshed shared by all residents - I suggest that the bar of due diligence is higher here than accepting “claims” that the panels will not be visible only when “there will be leaves on the existing trees.”

Furthermore, as the Planning Board wrote to you in your letter on December 31, 2020 (quoted below), it is clearly within your power to require substantial changes to the project should you require it (emphasis mine):

*The Planning Board noted that the applicant intends to clearcut approximately 7 acres in what is designated as a no-disturbance area in the original special permit for the golf course and the Environmental Management Plan thereunder; and accordingly the Planning Board believes that both the Village Board and the Planning Board have the clear right to deny essential components of this application respectively coming before them. The Planning board further noted that on the approximately 7 clearcut acres where the solar panels or access/maintenance roads are to be located, there would be no trees left to preserve; the areas under panels would be replanted with a grass seed mix. The remaining approximately 5.1 acres will not be disturbed.*

Solar is a virtuous aim, one that may require significant sacrifice.

But how many mature forest areas of this size are there left in Croton? Is this the right sacrifice? The reality is that we have very few large tracts of mature forests in the village, much less ones that were designated specifically as non-disturbance areas when the Golf Course was originally permitted.

Let's also be honest – cutting up a 12+ acre parcel of contiguous land and then leaving the 5-6 acres remaining as a “non-disturbance” is a nearly irrevocable act that indelibly changes the ecosystem of the remaining land and one cannot undo without a century's worth of consistent work. There's no going back on this.

Finally, no matter the above, this project should not be approved until a complete Stormwater Pollution Prevention Program is submitted and vetted AND the property owners

nearby have guaranteed protections from the potentially severe adverse impacts on runoff, traffic, noise, etc. To that end, the protections offered to the property holders by the Maintenance Yard special permit (including maintenance bonds, etc.) are a good foundation to build on.

In the end, the question before you isn't "Should Croton do Solar?"

The question is, "Is this project the right way for Croton to do Solar?"

I look forward to working with you, the applicant and the community to help answer that critical question.

Thanks,

A handwritten signature in black ink, appearing to read "JEL", written in a cursive style.

John Ealer



The International Corporate Center, 555 Theodore Fremd Avenue, Rye, NY 10580

Telephone: 914.381.7600 · [www.dorflaw.com](http://www.dorflaw.com) · Facsimile: 914.381.7608

February 8, 2021

Mayor Brian Pugh and Members of the Village Board  
Stanley H. Kellerhouse Municipal Building  
1 Van Wyck Street  
Croton-on-Hudson, New York 10520

Dear Mayor Pugh and Members of the Board of Trustees:

Please be advised that I represent the home and property owners on Prickly Pear Hill Road adjacent to the Hudson National Golf Club. I am writing to you in your capacity as the lead agency under SEQRA for the proposed Special Permits, subdivision, and amended special permit submitted by Hudson National Golf Club (The Club) on August 28, 2021.

The proposals as submitted, if approved by the Village would result in permanent and substantial damage to the residents of Prickly Pear Hill Road as well as exacerbate existing environmental problems already created by the Club's ongoing operations.

The proposal as submitted seeks an amendment to an existing special permit for a commercial project, the installation of a giant field of solar panels on a 15-acre lot to be subdivided from the Club's existing property. The subdivided lot would then be leased to a commercial entity, Matrix Development, LLC who would then need a special permit from the Village to clear the land and install the solar panels. This area has been designated a "non-disturbance area" by the Village. The Club has failed to abide by the terms of the original Special Permit granted by the Village in 1994 and amended in 1999. It is inconceivable that the Village would entertain an application of this magnitude from an applicant that has blatantly disregarded the terms and conditions of prior approvals. Certainly, my clients have no confidence that if these applications were approved with conditions, that the applicant would comply or that the Village would enforce them.

#### SEQRA

SEQRA requires that the Village take a hard look at the environmental impacts of a proposed project. In order to do that you need accurate information about the project. The Club filed a short form Environmental Assessment Form which was inaccurate but also woefully inadequate for you to make the determinations you need to make. Based on that form you designated the action as Unlisted under SEQRA. Given the nature of the projects and the impacts therefrom this should have been designated a TYPE 1 action. At the very least the applicant should be required to submit a Full Environmental Assessment Form which will provide more detailed information upon which you can make a determination of significance. That determination should be a positive declaration necessitating a Draft Environmental Impact Statement.



## The Application

The Applicants short form submits that the proposed action is consistent with the predominant character of the existing landscape (Question 6). It is not remotely consistent. Eight (8) acres of solar panels on large pedestals are not at all consistent with the existing landscape which is fully grown trees adjacent to residential homes and a golf course.

In response to question 17 applicant states that stormwater will not flow to adjacent properties. Not true. It will. In fact, the applicant has been so negligent in its compliance with its existing site plan that stormwater routinely discharges onto my client's properties. This project will only exacerbate that problem. See attached (Exhibit A) Google Earth photos showing existing stormwater runoff.

## Consistency with the LWRP

This project is not consistent with your Local Waterfront Revitalization Plan. The project fails to provide adequate flooding and erosion control measures which are specified in your LWRP. Proposing a project of this magnitude in a "non-disturbance area" is clearly inconsistent with the policies enumerated in your LWRP.

## Impacts

The applicant proposes the removal of 581 mature (greater than 4" diameter) trees upland from my client's homes. No replacement plan is proposed because they will be replaced by impervious panels on pedestals. The majority of these trees are on steep slopes, by Village definitions, ranging from steep to extremely steep (35% or greater). Solar field 2 will be built on land with numerous stone cliffs and outcropping. Construction on steep slopes (greater than 15%) will result in adverse impacts including land slippage, erosion, changes to stormwater runoff and location, visual impacts, and safety issues for vehicular access. Upstream and downstream habitats and resources can be affected by erosion and sedimentation. Unstable soils can cause landslides or slippage after construction, creating ecological damage as well as unsafe conditions. Construction on steep slopes can change the pattern of runoff and the quantity of runoff, thus impacting soil stability and down slope areas. Steep slopes are usually part of a significant landscape characteristic (including the ridgelines) that when altered can change the visual quality of the area. This will require a much more detailed topographic survey, so that these particularly difficult storm water erosion mitigation strategies be developed.

The short form EAF does not even mention the tree removal although the CAF notes that the "project will remove trees but will only disturb ground cover minimally" without explaining how it intends to do that. This project is not just "removing trees" it is denuding almost 9 acres of mature trees that provide many natural benefits to the area. By way of example, the canopy of a tree increases exponentially as the tree trunk diameter increases. A 4" caliper tree would only have a quarter size of an 8" caliper tree, thus if the applicant were to replace the canopy of those trees slated for removal (581), and all of those were measured at only 8" in diameter, then at the very minimum the planting of at least 4 times as many trees would be required to adequately replace the lost canopy. NO replacement is proposed. This is a significant factor when considering the ecological impact the removal of 581 mature trees will have on the environment. A Draft Environmental Impact Statement would provide you with the detailed information you will need to assess these impacts on the ecosystem.

As your counsel has advised you the Club has created an ancillary maintenance facility adjacent to the proposed subdivision. This was not permitted under the special permit and has created a serious

stormwater problem for the neighbors. The area was cleared, land was regraded, water rerouted, and structures erected without any approvals. This is unacceptable. The remedy proposed, that they now seek permission for already constructed buildings is not a solution. Of course, it is always easier to seek forgiveness than ask permission but that is not going to resolve the problem. The structures need to be removed and the area restored to its original condition.

Attached please find Google Earth aerial photos (Exhibit B) showing the significant changes the club has made to the area, all of which have had a detrimental impact on the environment and the neighborhood. These changes were made without Village approval. The Club needs to be told to restore the vegetation and be required to submit a landscape plan that accomplishes that objective. It should be done before this application is considered.

The proposed project will require the disturbance of soil and groundwater that is already likely contaminated from many years of golf course treatment. My clients have seen foam created in the water runoff, as have neighbors on Finney Farm Road. Risks of exposure to those contaminants like pesticides and fertilizer will increase both during and after construction. A DEIS is needed to address this important issue.

We are aware that your consulting engineers have recommended that the applicant prepare a SWPP and make other modifications. While we appreciate the comments in the Chazen memo we feel it does not go far enough. Certainly, even the information requested by Chazen would require at a minimum a Full Environmental Assessment Form. We have identified some of the significant environmental issues you need to address. Clearly this project needs a far more robust environmental review than it has received thus far.

We respectfully request that the Club be required to bring itself into full compliance with its original site plan and special permit approvals. We further request a Full EAF be prepared so you as the lead agency will have sufficient information to make a proper SEQRA determination and we can better evaluate the potential impacts of this project.

Thank you for your consideration.

Very Truly Yours,



DORF & NELSON LLP

Paul J. Noto, Esq.

Cc: Mitchell Bring

Robert Luntz & Members of the Planning Board

Linda Whitehead, Esq.

**Exhibit A**

The storm water runoff problems on Prickly Pear Hill are a result of the massive expansion of the “maintenance yard” area and the lack of maintenance of the road side swales on both sides of the road.



2002



2006 Trees to the west (left) of the yard removed, cut and fill operations begin on the south edge.





2014 Additional clear cutting to the north and west of the original yard. This shot catches the construction of the illegal structure close up below:



Construction structure apparent in the middle of the image, large number of large tree trunks to the left of the image. Notice further clear cutting to the upper north side of the paving.





20016: Area to the left of the yard regraded from an approximately 30-foot hill to a flat surface.



Notice the white material spill to the right directly into the drainage "system" and onto the neighboring properties and on to the Hudson.





The large-scale regrading and the tree removals begins to create significant drainage problems for the yard. They build an asphalt berm along the south (toward the bottom on the picture) edge of yard that conducts the water to an illegal trench across Prickly Pear Hill Road.



The asphalt berm acts as a curb forcing the water into the trench.





Trench installed in Fall 2016. It would have prevented emergency vehicles from gaining access to the golf club.



2016: the trench flows to an ad hoc open sediment collection ditch, which now receives all of the water from the expanded maintenance yard and the water from the lower golf course part of Prickly Pear Hill Road.





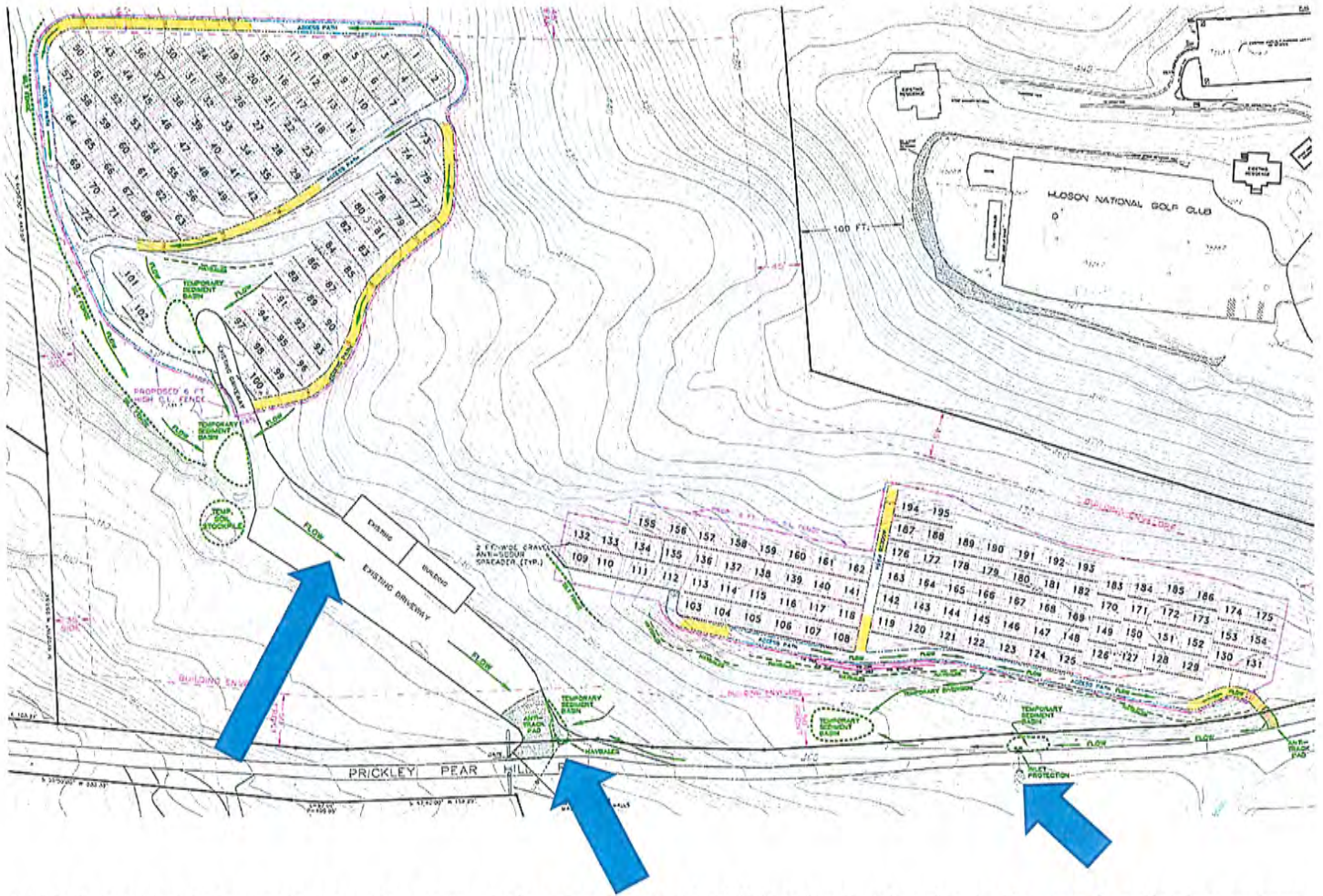
May 2017: Water now cascades from the catchment pond through the adjoining McNatty property 16 Prickly Pear Hill Road and on to my property at #12 Prickly Pear Hill Road, unlike anything seen before including Hurricane Floyd.



Looking South from above driveway at 12

Prickly Pear. The muddy water is flowing from the direction of Prickly Pear Hill Road where the new trench and catchment pond supply. The head wall and rock sides contain the pre-existing stream which comes from behind my neighbors (# 16) house, and has been there since I bought the house. The complete discharge from maintenance yard the water flowed further downhill to my neighbor's yard #4, changing the ground water level causing his septic field to fail.

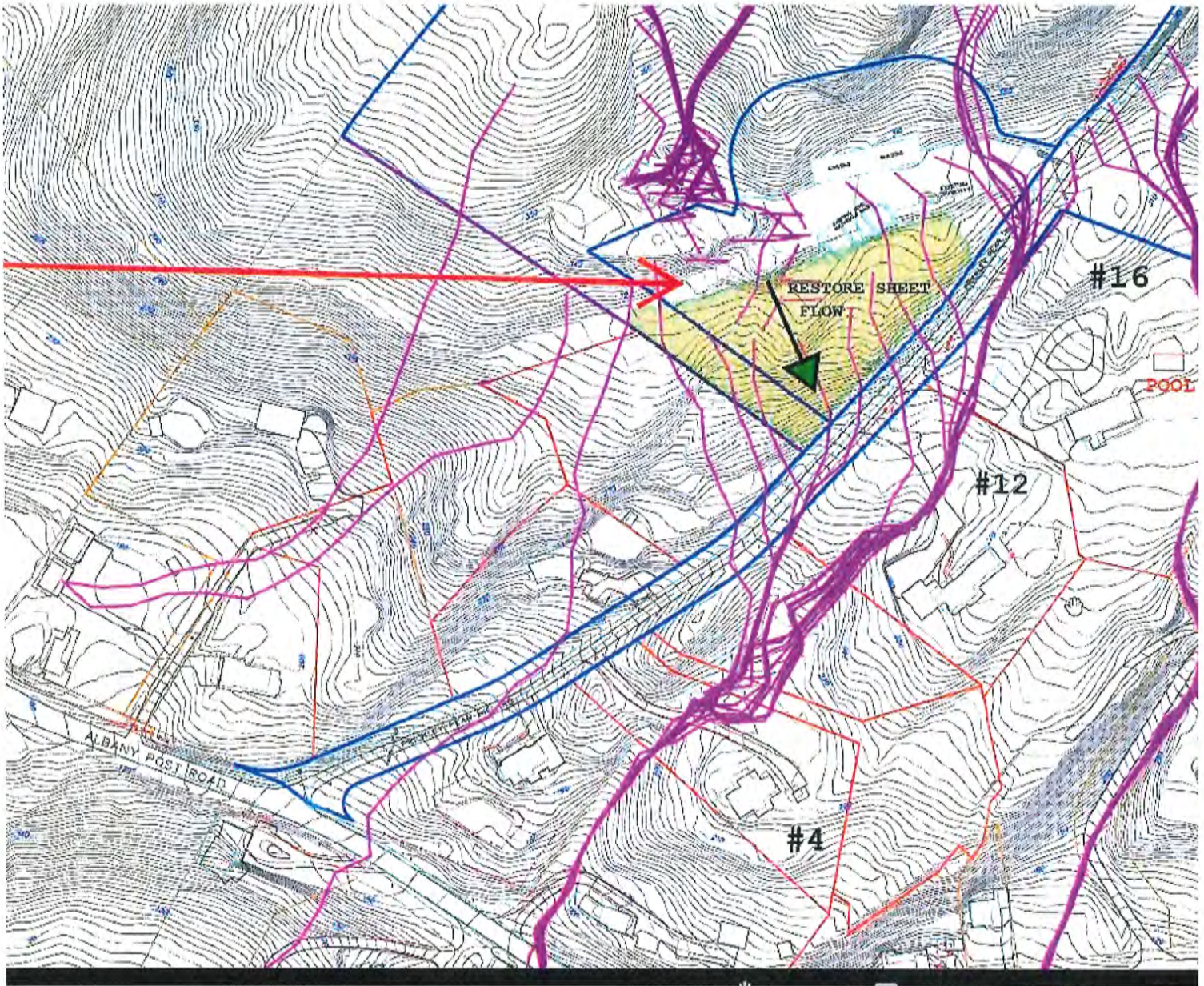




2020: The initial Solar project erosion control plan simply added additional water burden to the non-functioning system.



Dec 8 2020: Our letters to the planning board were communicated in advance to the applicants. During that meeting Mr. Mastromonaco showed a revised impromptu plan saying it was a simple fix by restoring the sheet flow.



December 9, 2020: The crews at Hudson National Golf Course bull dozed the asphalt berm or curb on the south side of the maintenance yard.

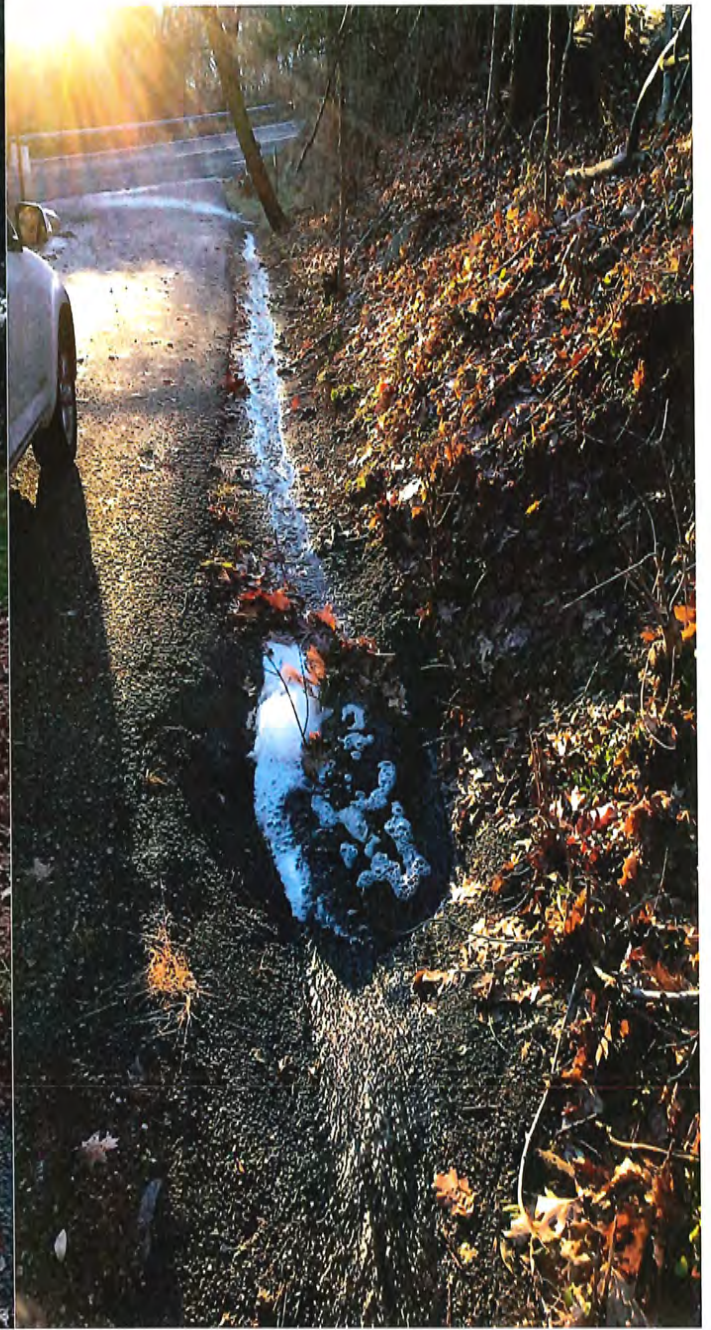


In so doing they allowed the water created by the enormously expanded maintenance yard to flow unimpeded on to the adjacent properties on the other side of the road (NE) causing significant new problems.



Shown here Dec 25.





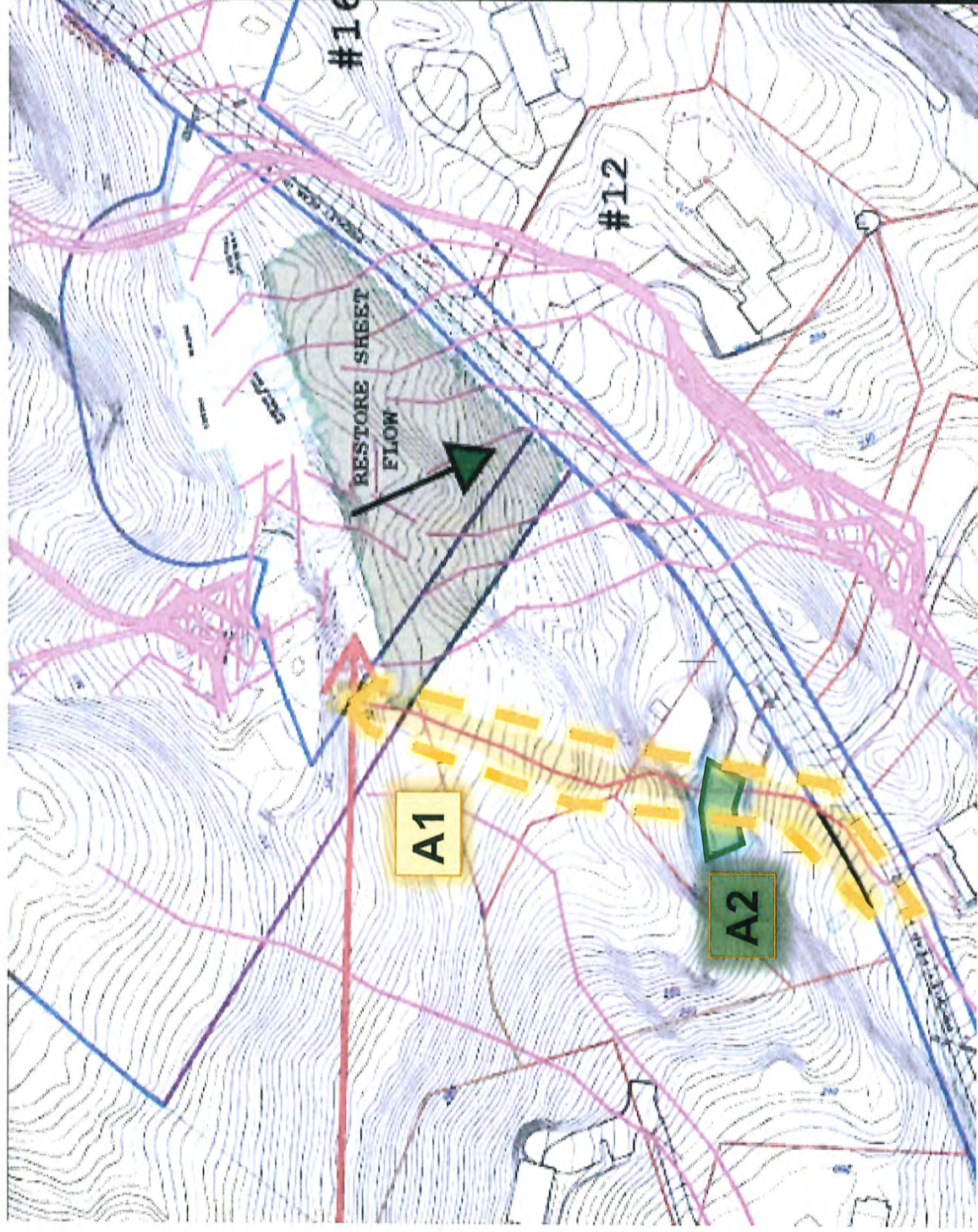
See also Ealer Power Point in shared Dropbox.



## Ealer Residence

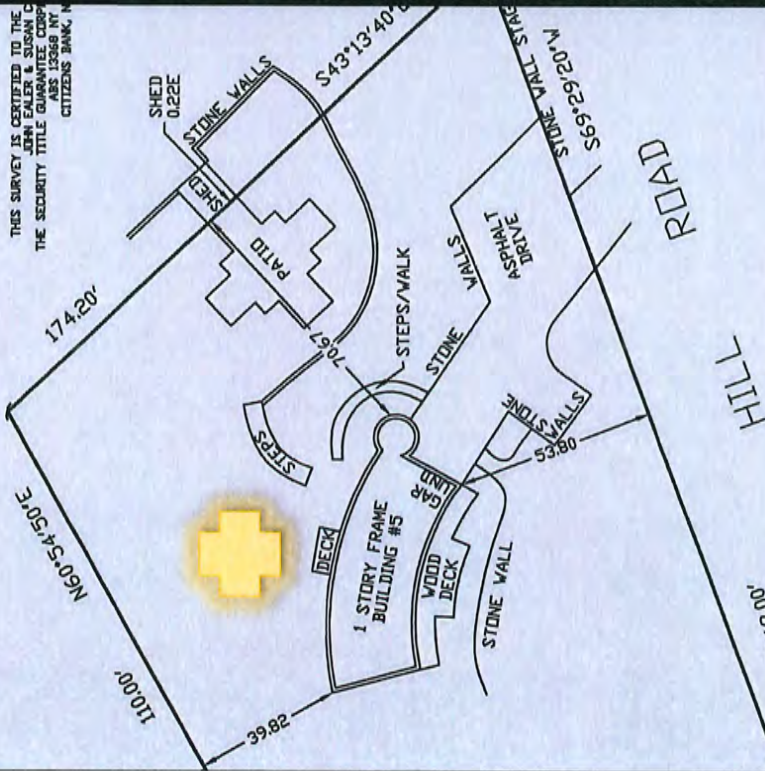
5 Prickly pear Hill Rd.

Hudson National  
Water Flow Study  
showing path of their  
runoff "A1" flowing  
right through our  
house "A2."





THIS SURVEY IS CERTIFIED TO THE  
JOHN EALER & SUSAN C  
THE SECURITY TITLE COMPANY  
CITIZENS BANK, N



SURVEY  
V.C.T.A. WESTCHESTER  
SITUATED  
5 PRICKLY PEAR  
LOCATION ON  
TOWN OF  
WESTCHESTER COUN

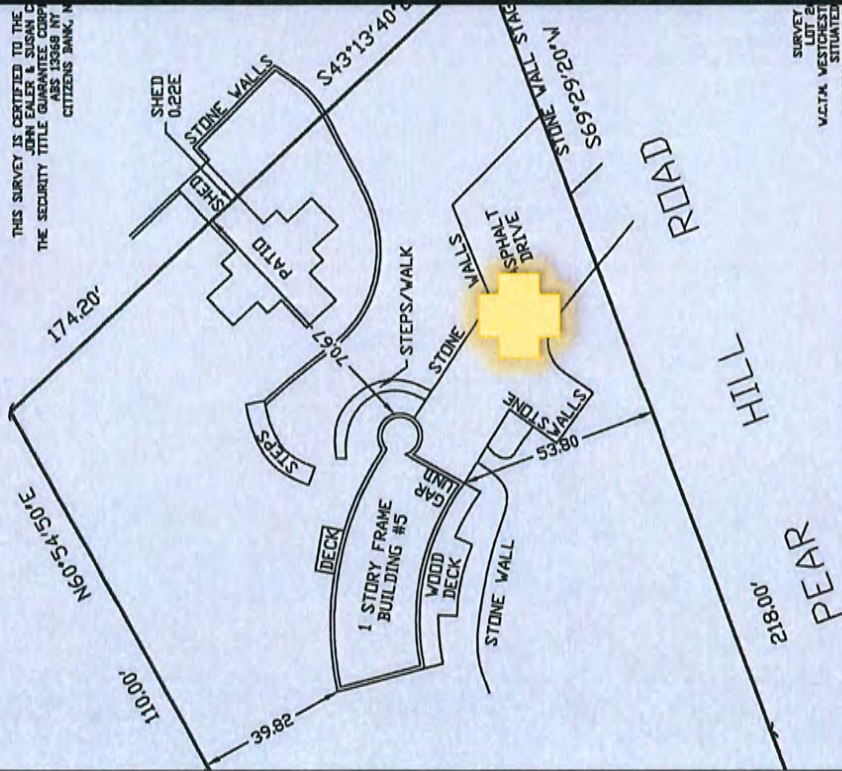
TITLE	S
PREPARED	EAL
SITUATE	PEAR HILL RO
TOWN OF	CORLAND
PREPARED	DSF SURVEYING
1776 BELL HOLLOW ROAD	PUTNAM VALLEY, NY 105

Photos showing runoff behind our house.





THIS SURVEY IS CERTIFIED TO THE  
JOHN EALER & SUSAN C  
THE SECURITY TITLE GUARANTEE CORP  
ABS 13368 NY  
CITIZENS BANK, N



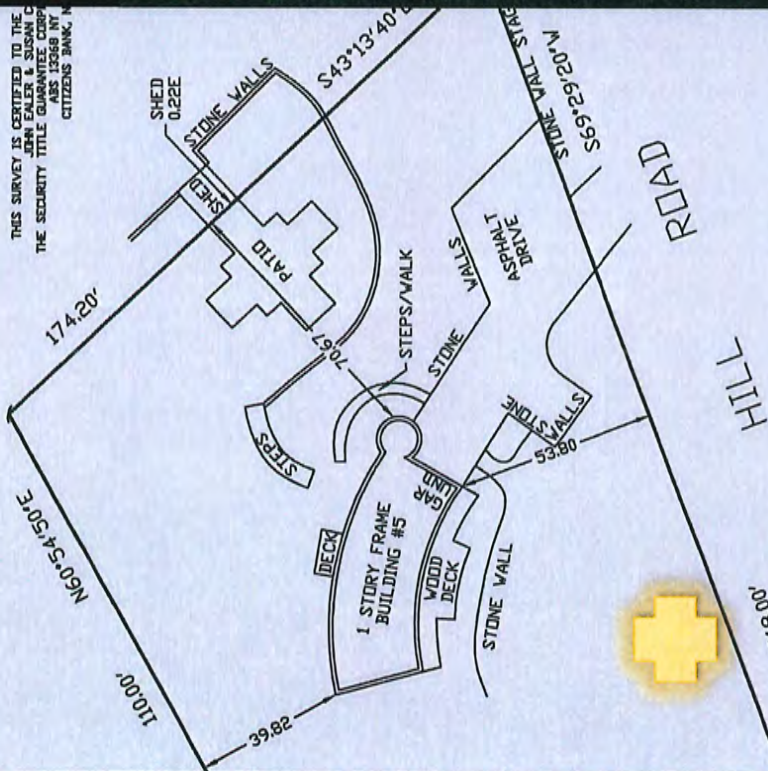
SURVEY  
LOT 2  
V.C.T.M. WESTCHESTER  
SITUATED  
5 PRICKLY PEAR  
CROTON ON  
TOWN OF CO  
WESTCHESTER COUN

TITLE	PREPARED BY	DATE	SITUATION	PREPARED BY
			5 PRICKLY PEAR HILL ROAD TOWN OF CORTLANDT	DSF SURVEYING 176 BELL HOLLOW ROAD PUTNAM VALLEY, NY 10559





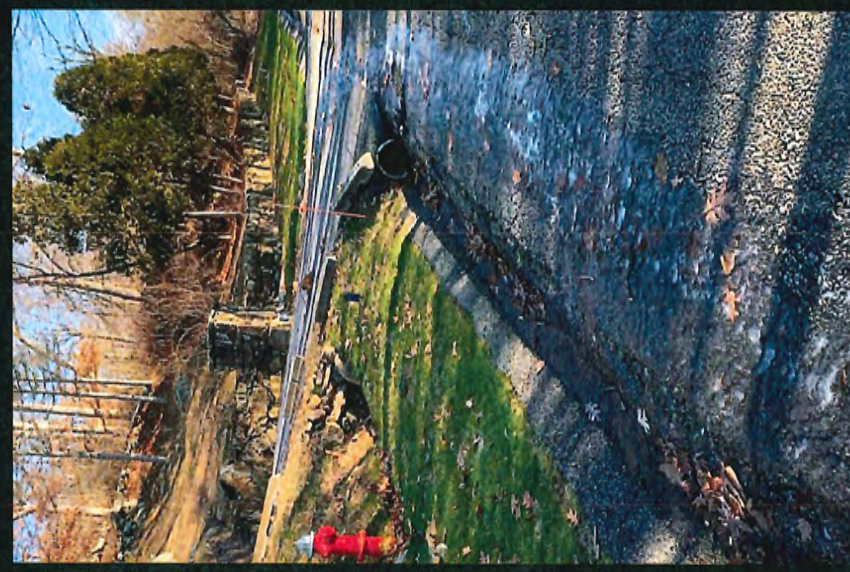
THIS SURVEY IS CERTIFIED TO THE  
 TOWN OF WESTCHESTER, NEW YORK  
 THE SECURITY TITLE GUARANTEE CODE  
 AS 13368 NY  
 CITIZENS BANK, N



SURVEY  
 LOT 6  
 VICTIM WESTCHESTER  
 SITUATED  
 5 PRICKLY PEAR  
 TOWN OF WESTCHESTER  
 WESTCHESTER COUNTY

TITLE	S
PREPARED	EAL
SITUATE	ROAD
5 PRICKLY PEAR HILL RO	
TOWN OF WESTCHESTER	
DSF SURVEYING	PREPARED
176 BELL HOLLOW ROAD	
PUTNAM VALLEY, NY 105	

Photos showing runoff/erosion at road.



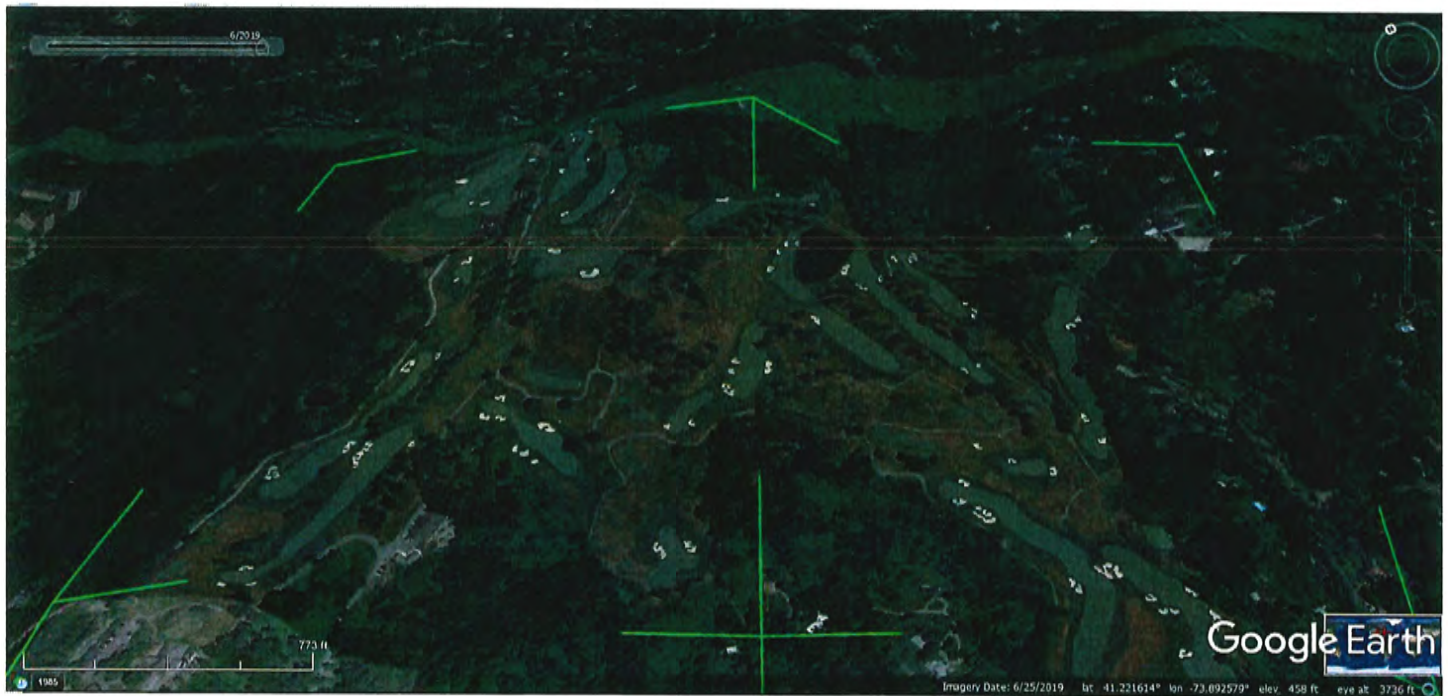
**Exhibit B**



May 3, 2009



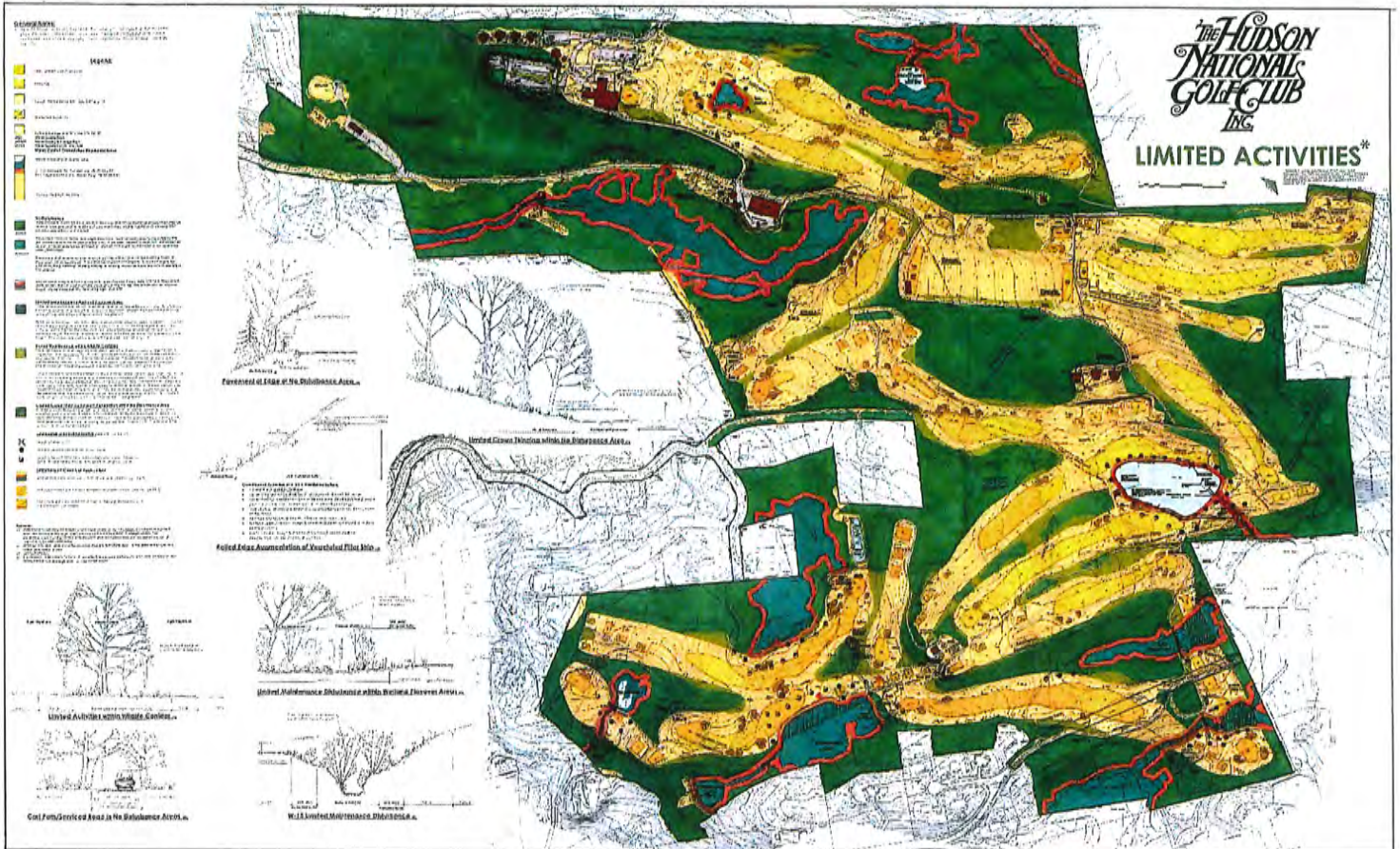
June 25, 2019



<sup>i</sup> Attached HNGC Amended site plan resolution 3.2.1999 #38. If the Village Engineer and/or the Village's Code Enforcement personnel conclude that there has been a pattern of recurring and substantial non-compliance with the terms of this resolution, the EMP or the Amended Special Permit Approval then, after notice to the Applicant and an opportunity to be heard, the Village Engineer may issue a stop play order and a declaration of lapse of site plan approval, a review of which may be taken directly to the Supreme Court.



Golf Course: Non Compliance with Appendix VI of HNGC EMP Limited Activities in Non Disturbance Upland Areas:



\*Appendix VI, Limited Activities map of the Environmental Management Plan [EMP], last revised January 10, 2000. Compliance with which is required as a condition of the March 1, 1999 Planning Board approval of the construction and operation of the Hudson National Golf Club.<sup>i</sup>

**Legend:**

**No Disturbance**



**UPLAND**

These are areas in which the natural progress of succession to a mixed hardwood forest shall be allowed to progress unaffected by golf course activities. Wildlife habitats shall develop and evolve unassisted and unimpeded.

See Below:

---

**From:** Steve Varvaro  
**Sent:** Monday, October 25, 2021 6:04 PM  
**To:** bpugh@crotononhudsonny.gov; Ann Gallelli; Sherry Horowitz; Ian Murtaugh; Len Simon; Bryan Healy  
**Subject:** Letter to the Village Board regarding Hudson National Proposed Solar Arrays (letter two, 10-25-21)  
**Attachments:** Hud Nat Village board letter 10-25-21.pdf; Screen Shot 2021-10-25 at 5.56.59 PM.png; Screen Shot 2021-10-25 at 9.38.45 AM.png; Screen Shot 2021-10-25 at 9.38.15 AM.png

\*\*\*CAUTION: External sender.\*\*\*

Dear Members of the Croton on Hudson Village Board please read and review.

thank you,  
Steve and Beddy Varvaro



---

**From:** Georgiana Mitchell  
**Sent:** Monday, October 18, 2021 3:40 PM  
**To:** Bryan Healy; Dan O'Connor; Ann Gallelli; Brian Pugh  
**Subject:** My Submission for tonight's meeting- HNGC Solar Panels  
**Attachments:** Village of Croton Public Hearing on the HNGC Proposal for a Solar Field.docx

\*\*\*CAUTION: External sender.\*\*\*

Thank you all for the opportunity to be heard on this important matter.  
Please find below my submission in to the record of the meeting.

Sincerely,

Georgiana Mitchell  
12 Prickly Pear Hill  
Croton on Hudson, New York 10520

---

**From:** Mitchell Bring  
**Sent:** Friday, October 29, 2021 1:26 PM  
**To:** Brian Pugh  
**Cc:** Guy; Georgiana Mitchell; John Ealer; Domna; Steve Varvaro; Ann Gallelli; Sherry Horowitz; Ian Murtaugh; Len Simon; Bryan Healy; Beddy  
**Subject:** Re: Additional Public Comments: View Study of Proposed Hudson Solar Field from Croton Riverwalk  
**Attachments:** Cleared Area On Prickly Pear Hill in White.jpg

\*\*\*CAUTION: External sender.\*\*\*

Hello Brian:

Please add the attached image for Chazen to review. It shows the solar field areas as seen from the start of the river walk.

I draped the planed "work areas" on the topography of Prickly Pear Hill using Google Earth. The white areas show where the trees will be clear cut. It's important to note that both these areas span a vertical height up the hillside of approximately 100' or about the height of a 10 story building.

Chazen will probably have the means to even more accurately show the extent of the visual impact of this proposed project. I believe it essential to know what the project means for the future of Croton's environment, since if the project goes ahead as proposed, it will take over one hundred years for the land to return to its present state.

During the meeting last week, the applicants understated the projects visual impact, when they said people will be able to see "that there have been some trees cut down."

I am grateful that Chazen will, in an unbiased way, visualize what the views will really look like.

Given the scale and duration of this projects impact on the whole community, I believe it warrants further scrutiny and deliberation.

Surely another less environmentally and visually damaging site could be found.

Thank you for your continued attention,

Mitchell

On 10/29/2021 9:11 AM, Susan Ealer wrote:

Thanks, Brian. That's great. I appreciate you letting us know.

Sue

On Fri, Oct 29, 2021 at 8:36 AM Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)> wrote:  
Hi Susan,

Thank you for sharing. We are having Chazen, our independent engineering consultant (hired at the applicant's expense), review the viewshed analysis the applicant provided.

Brian Pugh  
Mayor, Village of Croton-on-Hudson  
Stanley H. Kellerhouse Municipal Building, 1 Van Wyck Street, Croton-on-Hudson, NY 10520  
P: 914-374-3960 F: 845-853-1509  
[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)  
<http://www.crotononhudson-ny.gov>  
<https://www.facebook.com/CrotonGov>

Receive timely news and notices from Village Hall: <http://www.crotononhudson-ny.gov/subscriber>

PLEASE NOTE: Correspondence with the Village may be subject to public disclosure under the New York State Freedom of Information Law, through litigation, or otherwise in accordance with law.

Protect yourself & your community with a vaccine against COVID-19  
<https://am-i-eligible.covid19vaccine.health.ny.gov>

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**From:** Susan Ealer  
**Sent:** Thursday, October 28, 2021 6:11 PM  
**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>; John Ealer; Paul Noto  
**Subject:** Additional Public Comments: View Study of Proposed Hudson Solar Field from Croton Riverwalk

\*\*\*CAUTION: External sender.\*\*\*

Dear Board of Trustees,

Please review my attached *View Study of The proposed Hudson National Solar Field from the Croton Riverwalk*. It is my hope that you will consider how much this project will affect the character of our town before agreeing to let it go forward. The Riverwalk is just one important location where the project will be able to be seen.

Please add these to the other public comments you are collecting regarding the project.

Thank you for your time and consideration.

Susan Ealer, RA  
5 Prickly Pear Hill Rd.

---

**From:** Steve Varvaro  
**Sent:** Monday, October 18, 2021 3:30 PM  
**To:** Bryan Healy  
**Subject:** Re: Form submission from: Send Us Comments  
**Attachments:** Village Baord letter re Hudson National Solar arrays .pdf

\*\*\*CAUTION: External sender.\*\*\*

Brian,  
Sorry for the delay. The PDF is attached here.  
thx  
Steve

-----Original Message-----

From: Bryan Healy <bhealy@crotononhudson-ny.gov>  
To Susan Ealer  
Sent: Mon, Oct 18, 2021 2:59 pm  
Subject: RE: Form submission from: Send Us Comments

Mr. Varvaro,

I did not receive any comments from you in the manager's office email. Did you send anything?

**Bryan T. Healy**  
Village Manager  
Village of Croton-on-Hudson  
1 Van Wyck Street, Croton-on-Hudson, N.Y. 10520  
914-271-4848 / [bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)  
<http://www.crotononhudson-ny.gov/>



*Stay informed! Sign up for the Village's e-alerts, Code Red emergency notification system and social media accounts by visiting <https://www.crotononhudson-ny.gov/home/pages/stay-connected>.*

#### DISCLOSURE NOTE

Any email sent or received through the Village of Croton-on-Hudson email system may be monitored in the normal course of Village business, may be released to the public under the New York State Freedom of Information Law, and is subject to discovery proceedings in legal actions.

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**From:** Croton-on-Hudson NY via Croton-on-Hudson NY <cmsmailer@civicplus.com>  
**Sent:** Monday, October 18, 2021 12:09 PM  
**To:** Manager's Office <managersoffice@crotononhudson-ny.gov>  
**Subject:** Form submission from: Send Us Comments

\*\*\*CAUTION: External sender.\*\*\*

Submitted on Monday, October 18, 2021 - 12:08pm  
Submitted values are:



Choose One: Public Comments for Board Meeting

Please include any questions or comments: I will be submitting via the manager office email a letter to the Mayor and The Board pertaining to the proposed Hudson National/Matrix Solar plan.

==Please provide the following information==

Your Name: Stephen Varvaro

Email Address

==Address==

Street: 1263 Albany Post Road

City: Croton on Hudson

State: New York

Zipcode: 10520

Organization:

The results of this submission may be viewed at:

<https://www.crotononhudson-ny.gov/node/2/submission/9091>

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**From:** Joel Ginqold  
**Sent:** Sunday, October 17, 2021 11:00 AM  
**To:** Brian Pugh; Len Simon; Ann Gallelli; Sherry Horowitz; Ian Murtaugh  
**Cc:** Bryan Healy  
**Subject:** Solar Installation at the Golf Course

\*\*\*CAUTION: External sender.\*\*\*

To the Village Board,

As I will not be able to attend Monday's hearing on the installation of a solar array at the golf course, I would like to offer a few comments to you in advance of the meeting. I should emphasize that these comments are made as an interested citizen, not as a member of any group or organization.

Barring the existence of severe drainage or other major problems that cannot be mitigated, I urge the Board to approve the permit for the installation of a solar array at Hudson National, with whatever modifications are deemed essential.

The basic issue is simple. Either we are truly concerned about the impacts of climate change or we are not. I would think that the local effects of Ida—which was not even a hurricane when it hit our area—and the wildfires sweeping across the West would be convincing, even to those who were skeptical in the past. So those who are genuinely alarmed over where we appear to be heading—and I assume this includes most or all of you—have simply got to step up and do what they know to be the right thing, even when there may be those who loudly oppose such projects.

The Climate Leadership and Community Protection Act passed by the state legislature in 2019 sets very ambitious goals for the decarbonization of the state as a whole, and especially for the power sector. It includes the addition of 6,000 MWe of solar energy in the state by 2025, only four years away.

The shutdown of Indian Point, while it certainly had its problems, was an abject disaster for climate change and makes that job so much more difficult. But there is no way in the world that we will even approach the CLCPA's objectives if projects like that under consideration here are not permitted to proceed. Everyone says they want renewable energy, but they all want it to go "somewhere else." Well there are simply not enough somewhere elses to put it all in order to make everyone happy.

Unfortunately, the proponents of the Green New Deal have made it sound like the transition to renewables will be easy, and inexpensive, and quick. As you can well see from the current issue, it will be none of these things and some very difficult compromises will have to be made if we are to make progress against the encroachments of climate change. And I'm afraid that you find yourselves in the unenviable position of having to broker some of these compromises.

One issue that has been raised is the necessity to remove a large number of mature trees to allow installation of the solar panels. By any calculation, the installation of the panels will result in orders of magnitude more carbon reduction than the trees that must be sacrificed will ever sequester. But it may well be appropriate for the permit to require the developer to plant a specified number of trees in other areas of the community.

Others have raised the question of the appearance of the project, especially from lower areas of the village. While design features can be incorporated to screen some of the facilities from view, it is likely that at least some portion of the installation will be visible from some areas of the village. If that cannot be avoided, it is simply one of the many trade-offs that will have to be made if we are to even begin to reduce our carbon emissions.

And I'm sure that some of the project's neighbors will object and raise every manner of issue because they simply don't want the installation in their neighborhood. NIMBY is alive and well in Croton and nobody wants any kind of facility in their area. If we follow the dictates of all of these folks, nothing will ever get done anywhere.

It is incumbent on those in positions of responsibility, like yourselves, to make the case to your constituents, and convince them, that such things must be done if our area—our planet—is to remain habitable for the long term. That's what we call leadership. I will be long gone before the worst of it comes to pass, but I have children and grandchildren who will have to face the mess that we are leaving to them and I feel a responsibility to at least provide them with a habitable world.

So let us impose whatever reasonable modifications are necessary to mitigate the impact of the proposed solar farm. But in the end, unless there are very significant problems, e.g., drainage, that cannot be reasonably overcome, I urge you to approve the permit and let the project proceed.

Climate change is real and its manifestations are getting worse every year. Action must be taken at every level of government as well as by industry and every citizen if we are to reverse these trends. We in Croton can make our modest contribution by supporting this project.

Sincerely,

Joel E. Gingold  
55 Nordica Drive  
Croton-on-Hudson, NY 10520

---

**From:** John Ealer  
**Sent:** Monday, October 18, 2021 3:00 PM  
**To:** Bryan Healy; Board of Trustees  
**Cc:** Susan Ealer; Dan O'Connor  
**Subject:** Submission for tonights Public Hearing re: HNGC Solar Project  
**Attachments:** JEALER HNGC SOLAR LETTER.pdf

\*\*\*CAUTION: External sender.\*\*\*

Manager Healy, Mayor Healy and the Board of Trustees,

I respectfully submit the following feedback for the public hearing. I look forward to seeing you all tonight.

Thanks for all your time and attention to these important matters.

John

---

**JOHN EALER**  
Showrunner



---

**From:** Croton-on-Hudson NY via Croton-on-Hudson NY <cmsmailer@civicplus.com>  
**Sent:** Saturday, October 30, 2021 6:36 PM  
**To:** Manager's Office  
**Subject:** Form submission from: Send Us Comments

\*\*\*CAUTION: External sender.\*\*\*

Submitted on Saturday, October 30, 2021 - 6:35pm  
Submitted values are:

Choose One: Village Manager's Office

Please include any questions or comments:

Please stop the proposed project at Hudson National. Please do not trade trees for solar panels at Hudson National Golf Course. Work with them to find another location such as a parking lot.this is a critical environmental issue in our village.

Thanks for writing and your support!

==Please provide the following information==

Your Name: Christine Banta

==Address==

Street: 60 Olcott Ave

City: Croton On Hudson

State: New York

Zipcode: 10520

Organization:

The results of this submission may be viewed at:

<https://www.crotononhudson-ny.gov/node/2/submission/9126>

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**From:** Croton-on-Hudson NY via Croton-on-Hudson NY <cmsmailer@civicplus.com>  
**Sent:** Monday, October 18, 2021 3:24 PM  
**To:** Manager's Office  
**Subject:** Form submission from: Send Us Comments

\*\*\*CAUTION: External sender.\*\*\*

Submitted on Monday, October 18, 2021 - 3:23pm  
Submitted values are:

Choose One: Public Comments for Board Meeting

Please include any questions or comments: As a new resident to Croton-on-Hudson, I chose this town because it seemed to balance a love of nature with a vibrant local community. And though I fully support the use of eco-friendly solar panels, I do not believe it should come at the expense of deforestation. This will not only disrupt the habitats of many animals, but will have ripple effects throughout the entire ecosystem. I would ask the board not to approve the cutting down of trees for solar panels by Hudson National. Instead, perhaps the golf course could suggest a location that requires less destruction of natural resources. They may even consider placing the panels somewhere on the golf course itself, since it is already cleared land.

==Please provide the following information==

Your Name: Chris Doka

==Address==

Street:

City:

State:

Zipcode: 10520

Organization:

Phone Number:

The results of this submission may be viewed at:

<https://www.crotononhudson-ny.gov/node/2/submission/9106>

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**From:** Croton-on-Hudson NY via Croton-on-Hudson NY <cmsmailer@civicplus.com>  
**Sent:** Monday, October 18, 2021 12:09 PM  
**To:** Manager's Office  
**Subject:** Form submission from: Send Us Comments

\*\*\*CAUTION: External sender.\*\*\*

Submitted on Monday, October 18, 2021 - 12:08pm  
Submitted values are:

Choose One: Public Comments for Board Meeting

Please include any questions or comments: I will be submitting via the manager office email a letter to the Mayor and The Board pertaining to the proposed Hudson National/Matrix Solar plan.

==Please provide the following information==

Your Name: Stephen Varvaro

==Address==

Street: 1263 Albany Post Road

City: Croton on Hudson

State: New York

Zipcode: 10520

Organization:

The results of this submission may be viewed at:

<https://www.crotononhudson-ny.gov/node/2/submission/9091>



---

**From:** Croton-on-Hudson NY via Croton-on-Hudson NY <cmsmailer@civicplus.com>  
**Sent:** Sunday, October 17, 2021 5:59 PM  
**To:** Manager's Office  
**Subject:** Form submission from: Send Us Comments

\*\*\*CAUTION: External sender.\*\*\*

Submitted on Sunday, October 17, 2021 - 5:59pm  
Submitted values are:

Choose One: Public Comments for Board Meeting

Please include any questions or comments: Why is it with all the cleared land that Hudson National is in control of that they need to clear 600 trees on and adjacent to steeply graded land, within earshot of an existing homes.

==Please provide the following information==

Your Name: Guy Pardee

==Address==

Street: 53 Sunset Dr

City: Croton

State:

Zipcode: 10520

Organization: Resident tax payer

Phone Number:

The results of this submission may be viewed at:

<https://www.crotononhudson-ny.gov/node/2/submission/9086>

---

**From:** Len Simon  
**Sent:** Friday, October 29, 2021 11:27 AM  
**To:** Bryan Healy  
**Cc:** Ann Gallelli; Brian Pugh  
**Subject:** FW: Additional Public Comments: View Study of Proposed Hudson Solar Field from Croton Riverwalk  
**Attachments:** 20211028 Riverwalk Views of Proposed Solar Field\_Optimized.pdf

[Here you go –](#)

Len

**Len Simon**  
Trustee



Stanley H. Kellerhouse Municipal Building  
One Van Wyck Street  
Croton-on-Hudson, NY 10520-2501  
phone: 202-607-9234 fax: 914-862-3494  
[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)  
[www.crotononhudson-ny.gov](http://www.crotononhudson-ny.gov)

---

**From:** Susan Ealer  
**Reply-To:** Susan Ealer  
**Date:** Thursday, October 28, 2021 at 6:12 PM  
**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>, John Ealer Paul Noto  
**Subject:** Additional Public Comments: View Study of Proposed Hudson Solar Field from Croton Riverwalk

\*\*\*CAUTION: External sender.\*\*\*

Dear Board of Trustees,

Please review my attached *View Study of The proposed Hudson National Solar Field from the Croton Riverwalk*. It is my hope that you will consider how much this project will affect the character of our town before agreeing to let it go forward. The Riverwalk is just one important location where the project will be able to be seen.

Please add these to the other public comments you are collecting regarding the project.

Thank you for your time and consideration.

Susan Ealer, RA  
5 Prickly Pear Hill Rd.



---

**From:** Richard Ceccatti  
**Sent:** Monday, October 25, 2021 3:59 PM  
**To:** Brian Pugh <bpugh@crotononhudson-ny.gov>  
**Subject:** Document from citizensforresponsiblesolar

Brian: I am the treasurer for the Arrowcrest HOA. Saturday we received a flyer regarding the Hudson National solar array. Some home owners are concerned that the runoff could impact their property.

1. Will the project leach into the Westchester County conservation area?
2. What safe guards will Hudson National put in place to prevent a runoff?

Thank you for your attention to this matter.

Richard Ceccatti

----- Original message -----

From: Susan Ealer

Date: 10/18/21 9:14 AM (GMT-05:00)

To: Board of Trustees <boardoftrustees@crotononhudson-ny.gov>, John Ealer Subject:

My Comments Re: The Hudson National Proposed Solar Field for the Public hearing

Tonight

Dear Board,

Thank you for the opportunity to comment on the proposed Hudson National Solar Field project.

Attached is a letter with my comments.

Thanks, again,  
Susan Ealer, RA  
5 Prickly Pear Hill Rd.  
Croton On hudson, NY  
10520

**From:** Chris Oliver  
**Sent:** Saturday, October 30, 2021 4:32:07 PM  
**To:** Board of Trustees <boardoftrustees@crotononhudson-ny.gov>  
**Subject:** HN Solar Farm with Accompanying Tree Removal

Dear Board Members,

While in principle I am for Solar Farms, cutting down a forest to build them is counterproductive.

To allow limited debate of this at a public board meeting while allowing Hudson National a full presentation, then postpone the (what appears to be inevitable) approval of this until the day after Election day is a slap in the face to your many constituents who oppose it. Were you to survey your constituents you will find supporters of this no-win deal for the Village in the minority.

This is a sweetheart deal for Hudson National. They have sufficient space within their already cleared property to do it. While this is a revenue-generating and cost mitigating project for Hudson National, what exactly do we taxpayers get out of this deal other than eroded hillsides and a clear-cut hillside? What purpose does it serve to renege on the 1999 agreement?

There was an agreement signed off on in 1999 to protect these areas.  
Waiving this agreement is a mistake. Please don't do it.

Respectfully  
Chris Oliver  
5 Alexander Lane



**From:** Arverne Girl **Sent:** Saturday, October 30, 2021 12:09:11 PM  
**To:** Board of Trustees <boardoftrustees@crotononhudson-ny.gov>  
**Subject:** no deforestation at Golf course

Please do not allow them to take down more trees.

The water run off of the cleared lands has increased substantially.

I live along a creek that comes down from that hill and during storms the water level is much higher than it has ever been.

A steep slope is not a place for tree removal, it will cause to silting of the streams, tree loss, and flooding.

Thanks

Sharon Lazarov

**From:** Geoff Hamilton

**Sent:** Saturday, October 30, 2021 4:01:28 PM

**To:** Brian Pugh <bpugh@crotononhudson-ny.gov>; Ann Gallelli <agallelli@crotononhudson-ny.gov>; Len Simon <lsimon@crotononhudson-ny.gov>; Ian Murtaugh <imurtaugh@crotononhudson-ny.gov>; Sherry Horowitz <shorowitz@crotononhudson-ny.gov>

**Subject:** SOLAR

Good afternoon Mr. Mayor and Trustees.

I would like to start off by saying I am absolutely 100% for solar in Croton, and can not think of a better place than a golf course for it.

However I have serious doubts about the current proposal as its presented. The obvious ones are the clear cutting of that many trees and my general skepticism regarding anything HNGC says. I strongly feel much more time and discussion needs to be had before a vote on the current proposal on those issues alone.

That said I don't believe the less obvious issues are being talked about enough.

The current plan appears to alter the scenic hudson views both from the river walk and the river itself.

I think the board should wait to hear from Hudson Valley land trust and other like minded organizations before making a decision.

Also I am concerned that a proper survey was not completed regarding possible protected or endangered flora and fauna by a neutral party. Also a reason to at the very least postpone any decision.

What other locations on HNGC are viable? What about their parking lot and other areas that are already clear of trees. This is a big open golf course after all surely there are more appropriate locations.

What are the real benefits to Croton residents? A 10% reduction in energy delivery costs to less than 200 homes is hardly a community benefit.

I just have very real doubts about this proposal and feel the board should really look hard at it from other angles before voting on it.

I am in contact with a few environmental non profits that specialize in river viewsapes and hopefully will have their opinions before the Nov 3rd board meeting.

Again I applaud this board for trying to to take a real step forward toward solar energy, but I as of now have too many doubts about this particular proposal to get behind it.

Please consider voting no (idealy) or at least vote to delay this approval until all information can be evaluated.

Best of luck on Tuesday.

Geoff

Geoff Hamilton  
Founder,  
Croton Hiking and Outdoors Club



**From:** Anne Sumers

**Sent:** Saturday, October 30, 2021 10:46:29 AM

**To:** Anne Sumers; Board of Trustees <boardoftrustees@crotononhudson-ny.gov> **Subject:** Work with HNGC to use already cleared land. No to deforestation!

Dear Croton-On-Hudson board of trustees-

Please don't trade trees for solar panels. Work with HNGC to use already cleared land.

Trees and forests are critical for soil conservation and wildlife conservation and climate change. Protect our steep slopes!



Thank you!

Anne sumers md  
93 Montrose Station Rd, Montrose, NY 10548

--

Anne Sumers, M.D.

**From:** [Croton-on-Hudson NY via Croton-on-Hudson NY](#)  
**To:** [Manager's Office](#)  
**Subject:** Form submission from: Send Us Comments  
**Date:** Monday, November 1, 2021 11:56:14 AM

---

Submitted on Monday, November 1, 2021 - 11:56am  
Submitted values are:

Choose One: Public Comments for Board Meeting

Please include any questions or comments: Please work with HNGC to relocate the proposed solar field to already cleared land. This will save the environment- trees, erosion, wildlife, in the official non disturbance area. Using existing cleared spaces such as the members parking, maintenance yard and/or maintenance building will provide covered parking while offering locations near to existing power lines that can be tied into. Even if there's a fund to replant, the proposed site would take a century to recover. Please don't trade existing trees for solar.  
==Please provide the following information==

Your Name: Georgiana Mitchell

==Address==

Street: 12 Prickly Pear Hill

City: Croton On Hudson

State: New York

Zipcode: 10520

Organization: Citizens for Responsible Solar



**From:** [Croton-on-Hudson NY via Croton-on-Hudson NY](#)  
**To:** [Manager's Office](#)  
**Subject:** Form submission from: Send Us Comments  
**Date:** Monday, November 1, 2021 7:27:14 PM

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**\*\*\*CAUTION:** External sender.\*\*\*

Submitted on Monday, November 1, 2021 - 7:27pm

Submitted values are:

Choose One: Public Comments for Board Meeting

Please include any questions or comments:

The

Trustees must NOT allow the Hudson national gold course to cut down hundreds of trees on a slope. These trees are serving the important job of preventing erosion. Why not put up the panels on grass ?

Oh the rich get richer.

==Please provide the following information==

Your Name: Christine O' Connor

==Address==

Street: Grand st

City: Croton

State: New York

Zipcode: 10520

Organization:

Phone Number:

The results of this submission may be viewed at:

---

**From:** Kristi Godek

**Sent:** Tuesday, November 2, 2021 7:32:46 AM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>

**Subject:** Hudson National

\*\*\*CAUTION: External sender.\*\*\*

I am writing to ask you to vote No on the Hudson National request to chop down almost 600 trees to put in solar panels. Hudson National does what is best for Hudson National, not Croton, not the environment. The loss of these trees will lead to dangerous erosion and an eyesore for their neighbors. They have gotten everything they have wanted for far too long. Vote NO on the HNGC project.

Thank you.

Kristi Godek

69 Penfield Ave

**From:** Kari Anderson

**Sent:** Tuesday, November 2, 2021 7:25:06 AM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>; Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>; Ann Gallelli <[agallelli@crotononhudson-ny.gov](mailto:agallelli@crotononhudson-ny.gov)>

**Subject:** Hudson National proposed Solar panels

\*\*\*CAUTION: External sender.\*\*\*

Hello,

I am writing in regards to the recent plan to clear and erect 6 acres of solar panels for Hudson National. The area in question is a steep incline. Removing the trees on this embankment will create serious slumping and erosion issues and will cause flooding to the people below. Besides this, it will cause an eyesore which the entire village can see and will lower property values for the neighboring families.

After the recent assault on our village of the "small fireworks display" which villagers were ill informed of, and resulted in the unnecessary death of a beloved pet (which neither HN or the board has even apologized for), it's becoming increasingly apparent that this board cares less about their constituents and the well being of the people they have promised to serve, and more about a golf course and its members who pay hundreds of thousands annually to join.

Please, do what's right and vote no to these proposed solar panels. There are plenty of other options, including covered parking lots which can be utilized which will not take precious resources such as trees and wildlife from our community.

Thank you for your time,  
Karilyn Anderson  
341 Grand Street

Sent from my iPhone



**From:** L.C. Casieri

**Sent:** Tuesday, November 2, 2021 4:14:21 AM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>

**Subject:** No to solar panels at Hudson National Gold Course

We are Village residents for 20 years. We do not support the proposed solar panels project at Hudson National. It is absolutely unacceptable to cut down trees for this project—especially so many trees. We urge the Board to vote No.

Chris and Laurie Casieri

106 Cleveland Drive

**From:** Kate Bellingham

**Sent:** Tuesday, November 2, 2021 4:45:05 AM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>

**Subject:** NO tree removal for solar panels

\*\*\*CAUTION: External sender.\*\*\*

Hello.

I'm writing to encourage you to say NO to HNGC regarding the removal of acres of trees for solar panels. There are many, many locations where those solar panels can go. The trees (and their inhabitants! And the oxygen they give us! And the CO2 they absorb!) must stay.

Their removal for the purpose of installing solar panels would be absolutely ludicrous. PLEASE do anything to stop this.

Thank you

Kate Bellingham

7 Wells Ave COH

Hello.

I can't make the meeting, but I wanted to drop a note to indicate my opposition to this project moving forward. While I am a strong supporter of alternative energy, in particular solar, I am not a supporter of destroying habitat home to over 600 trees, probably thousands of small animals, and millions of insects. Furthermore, what sort of change and harm might come to the remaining land abutting the clear cut area?

I fully support the golf course moving to more sensible energy options. Clear-cutting a forest so that they can do this is not the answer. Once those woods are gone, they can never come back.

Of all of the business entities in Croton, the golf course probably has more money than any other. It probably has more ability to affordably finance development than any other. It also has a ton, an absolute ton, of existing open space. It's a golf course.

It might cost them more to utilize their existing hundreds of acres of open space for sustainable energy options, but they can do it.

This golf course should not be getting special, kid-gloves treatment from the Village. From what I've seen in my 11 years here, it never really does anything of note to benefit the town, anything that is visible at least. From what I've seen, they take existing concessions from the Village and abuse them. Aren't you still debating their abuse of the maintenance area with them? What makes you think this will be only 600 trees? What makes you think they will color within the lines when they've shown a tendency to go outside the lines in the past?

Don't let them destroy a forest. The cost far exceeds the benefit here.

Regards,

Chris Killian  
Glengary Rd



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**From:** Tom Ruth

**Sent:** Monday, November 1, 2021 9:44 PM

**To:** bpugh@crotononhudsonny.gov; Ann Gallelli <agallelli@crotononhudson-ny.gov>; Sherry Horowitz <shorowitz@crotononhudson-ny.gov>; Ian Murtaugh <imurtaugh@crotononhudson-ny.gov>; Len Simon <lsimon@crotononhudson-ny.gov>; Bryan Healy <bhealy@crotononhudson-ny.gov>

**Subject:** Comments on Hudson National Golf Club Solar Farm Project

**\*\*\*CAUTION:** External sender.\*\*\*

To: Croton-On-Hudson Mayor and Village Board

Brian Pugh Mayor 914-374-3960 [bpugh@crotononhudsonny.gov](mailto:bpugh@crotononhudsonny.gov)

Ann Gallelli Deputy Mayor 914-271-4848 [agallelli@crotononhudson-ny.gov](mailto:agallelli@crotononhudson-ny.gov)

Sherry Horowitz Trustee 914-271-5573 [shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)

Ian Murtaugh Trustee 914-271-4848 [imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)

Len Simon Trustee 202-607-9234 [lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)

Bryan Healy Village Mgr 914-271-4848 [bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)

From: Saw Mill River Audubon

Saw Mill River Audubon is a local chapter of the National Audubon Society with 1100+ members, primarily in northwestern Westchester County, including the Village of Croton-On-Hudson. We share a common desire to learn more about birds and other wildlife, and a common belief in the importance of preserving and protecting wildlife habitats.

Per our statement below, and also attached, we strongly support appropriately sited solar powered electric systems, and believe they are best sited to minimize negative impact on natural habitat. We want to learn more to ensure that solar farm installations help protect a healthy local environment.

After reviewing information on the proposed Hudson National Golf Club solar farm project, we strongly support further public comment, better SEQR review, and a complete EIS. The number of trees to be removed and the steep slope of the project are particularly concerning, including the difficulty of maintaining a healthy native plant meadow on the steep slope.

We thank you for the opportunity to offer this message and the attached statement as our comments regarding this project.

Best regards,  
Thomas Ruth  
Vice President, Advocacy Chair  
Saw Mill River Audubon  
917-817-3655

## **Saw Mill River Audubon Statement on Solar Power Project Siting Fall, 2021**

Saw Mill River Audubon strongly supports properly-sited photovoltaic solar power that avoids, minimizes, or mitigates impacts to birds, other wildlife and their habitats.

As with all forms of renewable energy, we expect the planning and approval process to consider potential impacts under the [Migratory Bird Treaty Act](#).

Saw Mill River Audubon strongly affirms the wisest planning approach prioritizes solar power projects sited on existing infrastructure—such as parking lots or building roofs— rather than allowing the loss of existing wildlife habitat and community open spaces.

Of particular concern is the clearcutting of wooded areas. Saw Mill River Audubon strongly affirms the following statement from the Pace University Climate Center:

*Trees are important for sequestering carbon, and also for protecting biodiversity, preventing heat island effects, and providing a healthy environment in urban and suburban areas. Biodiversity is especially difficult to*

*quantify and track, cannot be directly valued against other metrics like carbon reductions, and, as a result, is chronically undervalued, contributing to ecosystem losses. Given that biodiversity is severely at risk and that many decades are required to fully replace all the environmental services provided by mature tree stands, tree removal should only be done sparingly.*

[Source: Pace University Climate Center letter to Town of Mt. Pleasant, June 1, 2021.]

For established solar energy sites, Saw Mill River Audubon strongly encourages up-to-date land management using a native perennial and grass cover rather than a sterile lawn or gravel substrate. This management approach benefits pollinators, birds and other wildlife, reduces the need for herbicides, provides an additional positive climate impact, and requires overall less maintenance.

Saw Mill River Audubon | 275 Millwood Road, Chappaqua, New York 10514

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**Saw Mill River Audubon**  
**Statement on Solar Power Project Siting**  
**Fall, 2021**

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**From:** Faiza Alwy

**To:** [agellelli@crotononhudson-ny.gov](mailto:agellelli@crotononhudson-ny.gov) <[agellelli@crotononhudson-ny.gov](mailto:agellelli@crotononhudson-ny.gov)>; [bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov) <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>; [shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov) <[shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)>; [imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov) <[imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)>; [lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov) <[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)>

**Sent:** Tuesday, November 2, 2021, 11:09:02 AM EDT

**Subject:** Hudson National Golf Club

To the Mayor and the Trustees,

I am a 12-year resident of Croton. I appreciate and admire your service, and vote for the democratic ticket every election. This is the first time I am writing to the Board as the idea of cutting down over 500 trees by the Hudson National Golf Club simply does not make sense to me. I understand that the plan is to put solar panels but that just seems completely backwards. Solar panels should be installed wherever and whenever possible but not at the expense of cutting down mature trees. Can you explain why this idea is even being entertained? Is there a monetary benefit to the village?

Thank you.

Regards,  
Faiza Alwy

4 Arrowcrest Drive  
Croton-on-Hudson

**From:** David Mitchum

**Sent:** Tuesday, November 2, 2021 3:32:53 PM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>

**Subject:** golf course solar project

\*\*\*CAUTION: External sender.\*\*\*

Hello,

I think this project should probably be denied based the applicant's compliance history.

But I am concerned that we might be approving it based on a fear of litigation and the expense of such litigation at a time when the village coffers are empty. If this is a consideration factoring into the decision on whether to approve, I'd appreciate the Board being straight with us about it. It may well be valid a concern and if so it really shouldn't go unstated. Thanks!

David Mitchum

From: Loretta Reilly  
Date: 11/2/21 4:01 PM (GMT-05:00)  
To: Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>  
Subject: HNGC Solar Fields

\*\*\*CAUTION: External sender.\*\*\*

Dear Board of Trustees

I am writing to let you know that I do not approve of Hudson National's plans to build a solar field on their property and cut down 577 trees to do so.

Beyond the astounding environmental impact the project would incur, I am most concerned that Hudson National's track record for doing things without approvals and then pretending that they did not do anything shows that they are not to be trusted.

I am not opposed to solar. In fact, I think solar is a great idea. My concerns are with HNGC's motivations for monetary gains over environmental impact. They could easily give up a portion of the property that is already cleared for the golf course and erect the solar panels there. But instead, they choose to cut more trees down, impact all of their neighbors with water runoff, weaken the hillside, destroy habitat, and do nothing to mitigate the impact the construction of the fields would have on their neighbors.

HNGC has a track record of cutting down trees, carving out the hillside, expanding their maintenance area and then denying they did anything. They do things without permits or permission, and when caught either deny or ask for forgiveness.

The integrity of the hillside and the environmental impact of these fields has not been studied properly and HNGC is not doing their due diligence to fully research the impact and provide a concrete plan.

For these reasons I do not trust them to act ethically and appropriately in regards to this massive project.

Thank you  
Loretta

LORETTA REILLY  
3 Prickly Pear Hill  
Croton on Hudson, NY 10520



From: Marla Pardee  
Date: 11/2/21 5:53 PM (GMT-05:00)  
To: Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>  
Subject: HNGC

We say NO. Don't trade trees for solar! Relocate the HNGC project.

Marla Pardee  
53 Sunset Drive  
Croton on Hudson, NY 10520

**From:** meredith phillips

**Sent:** Tuesday, November 2, 2021 4:44:54 PM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>

**Subject:** Solar proposal: ☞

\*\*\*CAUTION: External sender.\*\*\*

Hello board,

Writing to let you know that I oppose Hudson National's proposal to cut nearly 600 trees in a slope so they can save on energy bills or call themselves « green. » Solar would be great but this plan does not sound good. People choose to live here because of the trees. Hudson National has proved time and again to be a bad, bullying, anti-environmental neighbor with little concern for the people who live here. When I think of some pillars of our community, it's Susan from Baked by or Lisa Moir or the family that owns Robbins pharmacy or the Cappricio's folks: people who work to bring our community up and not down. Please stand up to these bullies. They really care nothing for the residents of C-o-H and their revenue will not sink because of this. If they want to claim to be « green » they can come up with a better plan.

Thanks,

Meredith Phillips

**From:** Bryan Lavery

**Sent:** Wednesday, November 3, 2021 9:41 AM

**To:** Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>; [info@citizensforresponsiblesolar.com](mailto:info@citizensforresponsiblesolar.com); [agalleli@crotononhudson-ny.gov](mailto:agalleli@crotononhudson-ny.gov); Sherry Horowitz <[shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)>; Ian Murtaugh <[imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)>; Len Simon <[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)>; Bryan Healy <[bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)>

**Cc:** H           <[helen@bray.eco](mailto:helen@bray.eco)>

**Subject:** Hudson National Golf Course Proposed Subdivision

Dear Croton Governing Authorities,

I am sorry to say that I missed the public hearing on October 18.

Please reconsider your decision on Hudson National Golf Course (HNGC) proposal to remove 577 hardwood trees over 12.5 acres for the purpose of installing solar arrays. The premise of Hudson National moving to solar power seems admirable on the surface. I recommend that you dig a bit deeper into the impact of a construction project on this grand scale.

Hudson National's application has only been under consideration since October 5, 2020. The 577 trees have been part of Tree City for many more years. Site plan approval 2 acres of solar panels should not require the removal of such a large amount of trees on steep slopes. Hudson National Golf Course has over 260 acres of leased land. Surely they can locate their solar project somewhere on this vast property that does not require remove 577 trees from steep slopes; perhaps next to the clubhouse to demonstrate their commitment to green solar power.

I would like to ask what happens to the hardwood lumber that is cleared? Who benefits from the sale of \$3.6million in lumber? If Hudson National Golf Course is committed to greening the environment, this \$3.6million would be a nice donation to the Arbor Day Foundation

This installation will generate power for only 35 years and will be removed and the area reseed and "return it back to original condition". Will they replace the 577 hardwood trees.

Matrix Solar is a for profit real estate company involved with building solar arrays. Community solar has been around for 4 years. This is not a community solar system if the credits go to Hudson National Golf Course. Why size the 1.37MWh solar is the maximum Con Edison would allow on their grid. Hudson National does not need an array of this size to power. This is not a community benefit, if 60% of the generated power goes to HNGC and we destroy natural habitat in the process.

Destroying 7 acres in a Non Disturbance Zone is not something that should be allowed. Please remember the no disturbance zone (NDZ) means that **there shall not be any alteration of natural vegetation** including, but not limited to, cutting or clearing vegetation, construction, stockpiling materials or dumping organic or inorganic.

Please make a choice for our Village's environment. I am sure Hudson National Golf Course can afford to pay for its green electricity from another provider.

Thank you.

Sincerely,

Bryan Lavery and Helene Bray  
93 Truesdale Drive

From: Domna Candido

To: Brian Pugh; Ann Gallelli; Sherry Horowitz; jmurtaugh@crotononhudson-ny.gov; Len Simon; Bryan Healy; Thomas Morzello; doconnor@crotononhudson-ny.com

Subject: Candido Documents re HNGC Solar Plan for 110321 Board of Trustees Mtg for Posting today

Date: Wednesday, November 3, 2021 11:32:26 AM

Attachments: Candido HNGC Solar Ltr To Bd (1).pdf

HNGC Solar Project FinalPPNC.pdf

To the Mayor Pugh, the Board of Trustees and the Village Manager,

I am a resident of Croton and have been for over 21 years. Attached in connection with tonight's Board of Trustees Meeting for posting on the Village Site today are a letter from me and slides from a PowerPoint in pdf format that I created in support of my request to the Board 1) **Not to take a vote** on the Hudson National Golf Course Plan tonight and putting it off for as long as it takes for the Board to obtain all information and conduct all studies and assessments relevant to this matter upon which fully informed action can be taken; and 2) If and when the Board decides to go forward with taking that vote, I urge the Board to **vote "NO"** because I believe that the HNGC Plan is not environmentally solar responsible and will be damaging to the environment.

Thank You,  
Domna Candido



# *Domna Candido*

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1299 Albany Post Rd, Croton on Hudson, NY 10520

November 3, 2021

The Honorable Brian Pugh, Mayor,  
Village Board of Trustees,  
Village Manager  
Village of Croton-on-Hudson  
1 Van Wyck Street  
Croton-on-Hudson, NY 10520

Re: Hudson National Golf Course ("HNGC") Solar Plan

Dear Mayor Pugh, Board of Trustees and Manager Healy,

I want to add my name to what is now a growing number of voices within Croton in opposition to the HNGC Solar Plan by requesting that the Board of Trustees:

**1) Decline to take a vote on the HNGC Solar Plan** at the 11/3/21 Board of Trustees meeting, putting it off for as long as it takes for the Board to obtain all the relevant information necessary in order to adequately perform its fiduciary duties as elected officials to represent the interests of Croton residents and our Village. It appears, from what I have seen to date, that this vetting process has not been adequate to achieve what is necessary to protect the homeowners and residents of Croton, given the characteristics of the site for which this project was slated, and this has prejudiced the homeowners, residents and Croton community, in general, to be at this point in the process without the requisite information. A more complete review, such as requiring an Environmental Impact Statement, Post-Construction Storm Water Erosion Control Plans, the need for Reforestation Plans, a more thorough Wildlife Habitat Assessment Study, Screening Plans, assessing View Studies to determine the detrimental impact on Croton's scenic views, and other issues as requested by other homeowners and their attorneys and review by their expert, as well as more thorough and closer scrutiny of the representations and submissions made by HNGC are needed before a fully informed vote can be taken; and

**2) To vote "NO" on the HNGC Solar Plan**, if and when the Board decides to go forward with that vote because HNGC's Solar Plan on this particular site in a Non-Disturbance Zone as proposed, appears, on many levels, to be destructive of the environment, outweighing any benefit it purports to be bringing to the environment by virtue of it being a "Solar" project. The lesson here is that not all Solar is "environmentally friendly" unless it is responsible... and from all that I can see, this is NOT responsible solar!

This issue recently came to my attention just within the last week and a half. At first, I thought my immediate concern would be the possible drainage and erosion issues, as I live downhill from the proposed site, and storm water runoff and retention ponds are currently on my property. However, during this time, after reviewing the publicly available documents, talking to neighbors, doing my own research, I found that, in addition to possible drainage issues, I have great overall concerns that I would have regardless of where I would live within Croton ... both as to the plan as submitted by HNGC, but also with how the approval process appears to have been handled for the last 1+ years. As a result, **I am also attaching a pdf copy of a PowerPoint presentation** that I created with my thoughts on the issues of greatest concern with this approval process to date, (with some factual input from John Ealer and Mitchell Bring who have previously given their own comments both in writing and at the public hearing, and give reference to the informative View Study that Susan Ealer previously submitted to this Board showing likely viewshed from HNGC's Solar Plan at various locations in Croton, including along Croton's scenic riverfront (all of which can be viewed on this Village site)). If this Board believes that there is more information that we need in order to make a better assessment of our concerns, then I ask that the Board please pass that along to us, because, thus far, the dots do not seem to be connecting.

Given all the "time is of the essence" urgency created by HNGC's application apparently being fast tracked now in order for the Board to assuage what appears to be an arbitrary deadline put forth by HNGC for its own purposes, to start clearing acres of land as soon as possible in November, which would essentially cause immediate, irreparable harm to one of Croton's valuable environmental resources, I called Village Hall and spoke to several Village officials, including Dan O'Connor. I also called Brian Pugh, both in his capacity as Mayor and Trustee, several times, and left messages... but with no reply.

I wanted to find out, essentially:

- Why all this is appearing to be going forward without the requisite "i's" being dotted and "t's" being crossed that most municipalities would need to proactively do in order to fulfill their stewardship to the irreplaceable and environmentally vital forested land that is and has been in a "Non-Disturbance Zone".
- Why it appears that the burden of due diligence has shifted from the Board to be proactive in vetting HNGC's Solar Plan to whatever group of residents were aware and had great environmental concerns, to shoulder that burden for all of us (both from a time, cost and social benefit perspective) and being forced to do so at a Public Hearing (which is now officially closed) in a strictly limited 5 minute timeframe for comments for each person, when HNGC has been given unlimited time to present and respond... and all this, basically, it appears to me, in order for these Croton residents to have to prove to the Board of Trustees why the Board shouldn't go forward with a vote to approve this sweetheart deal by and for HNGC!
- And, to have to do so by trying to prove to the Board those facts which everyone who read the documents, paid attention to the issues, listened to inaccuracies that were being represented by HNGC, were interested in getting to the truth, and took seriously,



would already know, including the Board who has a fiduciary duty as to stewardship of our environment and safeguarding the resources and quality of life of our Village.

I've done some research over the past week and found that a number of the statements represented by HNGC were completely inaccurate and refutable. Very easy to find in quick searches on Google. Therefore, it is mind boggling to me that after having this matter before it for well over 1+ years that statements such as these are not being addressed by the Board. Very confusing. For example, if HNGC wants to focus on its Solar Plan as being a great contribution to the CO2 issues, then it is incumbent on HNGC to use calculations that are actually founded on fact as to sequestered CO2: 1) Not just submit pictures and charts that leave out of the equation sources of already sequestered CO2 that will be released back into the atmosphere by clear cutting acres of trees and leaving tons of cut trees there to rot; 2) Not misrepresenting to the Board that the mature trees they want to destroy are not continuing to benefit the environment by sequestering CO2, because they do; and 3) Not representing that somehow, somewhere some young seedlings or saplings that will be planted (although NO Reforestation Plan has been submitted or appears to even be considered) will even out the invaluable beneficial environmental role the existing trees in the forest play in combatting climate change, because huge numbers of saplings would need to be planted in order to do so, and there is nothing in the plan that evidences that ... I would like to state the obvious upfront about the general objections to this HNGC Solar Plan, because it is when these points get manipulated that the issues become less clear and vivid than what they really are:

### **1) The opposition is not about people being against renewable Solar Energy**

It's about being responsible to the environment by installing Solar in a responsible way. The HNGC proposed plan does not appear to be responsible Solar; in fact, the opposite is true. If the Board believes the plan to be responsible Solar, then please explain to us why they believe that this plan is not damaging our environment, and do so with documentary support, not with the unsupported assumptions and suppositions peppered throughout HNGC's documents posted on the Village's site where, for example, sections related to the necessity of protective studies or statements are just brazenly crossed out or negated with no explanation as to the basis for doing so, such as Ralph Mastromonaco's designation on the SWPPP, after indicators that issues likely exist, the conclusion "NO POST CONSTRUCTION TREATMENT REQUIRED" is stated.

This plan sounds environmental on its surface, afterall, it does have the word "Solar" in it ... but, in reality, it doesn't seem to be and no one has explained, based on real facts, why they believe that to be so! Should be easy to do, if it were true. But, effectively, destroying the environment in order to say that one is being environmentally conscientious makes absolutely no sense! Many municipalities which early on, eagerly jumped into implementing Big Solar by decimating huge swaths of valuable and irreplaceable forested land, now have serious regrets and are trying to rectify the damage done. In fact, solar-friendly states like Massachusetts are now trying to implement Solar responsible restrictions so that the large Solar fields are sited in parking lots, carports, on roofs, and sides of buildings where the benefits of Solar could be reaped without destroying invaluable forests, because they recognize that both their forests and renewable energy are

needed to be environmentally responsible. (Cites to articles are in attached pdf.) Also, HNGC's proposed Solar Plan seems to have little, if any, real benefit to Croton residents ... according to the plan only 170 Croton resident homes will be able to take advantage of the Solar energy generated getting just a 10% discount on their energy bills! Whereas, HNGC will largely benefit, being entitled to 40% of the energy and will be receiving ongoing revenue from this project and other benefits. But, Croton residents are being asked to bear the burdens and many risks!

It is already apparent that the legacy of going forward with solar without addressing doing so with responsibility to the environment will be a tainted legacy, particularly because at this point in time, it is already known, from the experience in other municipalities, that shortsightedness does not payoff. When already forewarned, one does not have the excuse that one did not know. Croton deserves better!

## **2) It is not about NIMBY...**

In fact, there is no really good reason beneficial to Croton or to the Village itself that the site of the HNGC Solar Plan must be on that particular steep slope forested land. The only real NIMBY argument here may be that HNGC may not really want it in its own real backyard... on other land within the 260 acres that it owns that has the more environmentally responsible and advantageous parking lots, car ports, sides of building and roof tops.

## **3) It is not about "not caring about climate change".**

Fighting to save the irreplaceable, contiguous forested lands that are invaluable to fight against climate change is the environmentally responsible thing to do! And, as we are fighting climate change issues, we should not be exacerbating the issues of increased storms, flooding and drainage by destroying eco and biosystems that absorb water (like our contiguous forested lands) in favor of clear cutting steep slopes unnecessarily when other sites are available and would be preferable, only to later find out that the increased water flowing from the solar farms, like what HNGC has proposed, start to result in mudslides in extreme climate change weather, as has happened in Japan and other places, where installation on steep slopes has been done. We need assurances that the Board has ensured that all necessary assessments and studies are done prior to any approvals are issued, particularly because other better site options are available.

Trust is not built when the perception is that one can only find it if one knows to ask the right question using specific language. Or, when the perception is that it is never clear whether there is more to a story than is being revealed. Or, when standards are changed depending on convenience for the argument being made. The threshold for implementing Non-disturbance Zones or environmentally protected land has not, is not and should not be premised on meeting a standard of extreme harm. If that were the case, then I think anyone who has any interest in protecting the environment should ask themselves how many of the necessary environmental protections would be able to be put into place, and why would that be the new standard for this HNGC project? How extremely affected does the wildlife need to be, to be worthy of our protection in this particular project, when they have been worthy of being protected in that habitat as a Non-Disturbance Zone for years!



In addition, if the issues of destruction or decimation of environmental biosystems and ecosystems is raised, it is not sufficient to address by talking solely about particular components of the system (e.g., responding solely about characteristics or numbers of the trees without addressing how the plan upsets the whole system (e.g., CO2, roots, drainage, insects, animals, habitat). Also, we need to be consistent in the standards being applied. If the issues of clearing acres of forested land in 2021 with what we now know and believe to be the detrimental impact to the environment and climate control as a result of that type of clearing, then referring to the number of times the land might have been cleared under lower standards used 50-60 yrs ago as a basis for doing it again now, is just not relevant. If it were, then why would we be interested in solar at all, or be interested in emissions control? That line of reasoning is so nonsensical because it would open the door to so many other issues, as many undesirable things took place 50-60 years ago that have been in the public discourse of late that we no longer would be comfortable justifying based on its historical existence... and rightly so. So why, when we now have a vital, contiguous forested, protected Non-Disturbance Zone, that's sequestering CO2, producing O2, cleaning air and water and providing habitat to wildlife ... why would we be comfortable going backwards to destroy this resource, fragmenting it, decimating the eco and bio-systems, in addition to possibly causing storm water erosion drainage issues, based on practices that were in effect 50-60 years ago? We should know better. And, to advance that line of thinking really undermines trust.

There is also reason to believe that contrary to the assertions of HNGC that the impact of siting the solar fields on the chosen steep slopes will result in just noticing that some trees are missing, the viewshed will not be minimal. In fact, it appears that what has up until now been Croton's scenic view from the Hudson River, may likely wind up being visual pollution visible from multiple locations including along Croton's riverfront.

The opposition to this particular HNGC Solar Plan on this particular steep slope forested site relates to grave concerns about the fact that it has serious flaws that the residents and homeowners of Croton need the Board and any of the other relevant Village Committees to address before any vote or approval goes forward. Croton, its residents, homeowners, natural resources, and currently protected environment, including its forested areas, wildlife, and scenic views respectfully request and believe that they deserve the Board's advocacy!

Thank you!

Sincerely,

A handwritten signature in cursive script, reading "Domna Candido".

Domna Candido

# The Proposed HNGC Solar Farm is NOT Environmental!



**CHOOSE ANOTHER SITE!!!**



# HNGC's Proposed Solar Farm is NOT Environmental!

- 12.5 Acres of Steep Slope land will become a solar site.
- 6.9 Acres will be deforested. The Ecosystem in the area will be disrupted.
- 577+ Trees, some >100-200 yrs old, performing invaluable ecological functions will be clear cut, destroyed and there is NO reforestation plan.
- Those trees will no longer perform the invaluable ecological task of sequestering CO<sub>2</sub>, providing O<sub>2</sub>, filtering water through the soil, removing pollutants, preventing erosion & providing wildlife habitat.
- The previously sequestered CO<sub>2</sub> will be released into the atmosphere from the tree cutting, the remaining tree stumps and tons of cut tree wood left to rot for years!

**CHOOSE ANOTHER SITE!!!**



# HNGC's Proposed Solar Farm is NOT Environmental!

- A currently forested environmental Non-Disturbance Zone will not only be disturbed, but decimated!
- Contiguous forested land, advantageous to wildlife, will be fragmented, destroying habitats, inhibiting animal movement, lowering quality of possible habitats... and Wildlife will be affected.
- A more complete assessment of area wildlife and habitat needs to be done... the submitted report was done in December!!



**CHOOSE ANOTHER SITE!!!**







# HNGC's Proposed Solar Farm is NOT Environmental!

- The 6+ acres of Solar Panels can increase the temperature in the immediate area affecting the immediate biosystem, types of plants & ecosystem.
- Tree cutting and temperature changes affect the underground network of roots and mycelium (mushrooms) essential for the ecosystem to live and thrive.
- Birds of prey accustomed to the Non-Disturbance Zone may not be able to find their prey due to Solar Panels.
- Birds and waterfowl can be injured or die due to known “Lake Effect” by mistaking the glare of the panels for bodies of water and flying into them.



**CHOOSE ANOTHER SITE!!!**





# HNGC's Proposed Solar Farm is NOT Environmental!

- Information has NOT been presented in a way that is complete and transparent, so that everyone is aware that there are significant consequences if HNGC's proposed Solar Farm is not handled responsibly!
- Approvals should not be rushed... more complete input from the homeowners and Community needs to be heard regarding inappropriateness of Site!
- When other Municipalities have rushed through approvals, haven't given complete consideration to all of these points, or objectives were misguided as is happening in Croton on Hudson, they are now regretting the loss of their valuable forest lands and now trying to put restrictions in place to prevent further loss!

**CHOOSE ANOTHER SITE!!!**



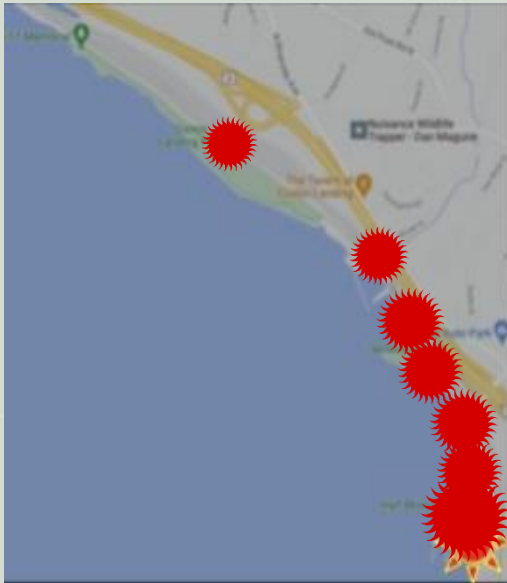
# HNGC's Proposed Solar Farm is NOT Environmental!

- The FACTS, contrary to representations made by HNGC:
  - Old Trees still grow and sequester CO2.
  - Young Trees might grow and sequester faster or more, BUT in order to outweigh benefits of older trees, huge numbers of young saplings **MUST BE PLANTED**, but that is **NOT** in HNGC's plan ... there is no Reforestation Plan!
  - Tree stumps and the tons of cut trees left behind to rot will still emit CO2 into the atmosphere for years, and tree stumps, by virtue of the cutting and continuous rotting of the stump and roots, will **NOT** be a good source of water absorption ... **NOT** a substitute for a Storm Drainage Plan & **NOT** included in presented CO2 Calculations.
  - Wildlife Habitat, and eco and biosystems will be affected ... these Must be considered, **NOT JUST DISMISSED!**

**CHOOSE ANOTHER SITE!!!**

# HNGC's Proposed Solar Farm is NOT Environmental!

- The FACTS, contrary to representations made by HNGC:
  - The HNGC Solar Farm will cause significant Visual Pollution
  - Viewshed of the HNGC Solar Farm will be visible from multiple locations around Croton, among them are the following as reflected on the View Study,\* excerpts of which are shown on the next page:



- The Hudson River,
- Half Moon Bay,
- Riverwalk Trailhead
- Senasqua Park Car Lot
- Senasqua Park Pavilion,
- The Crossining,
- Croton Landing Park

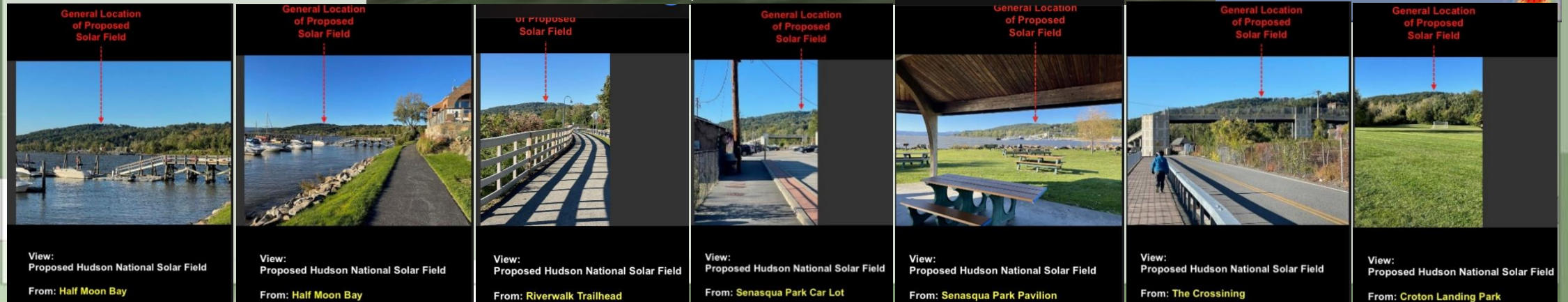
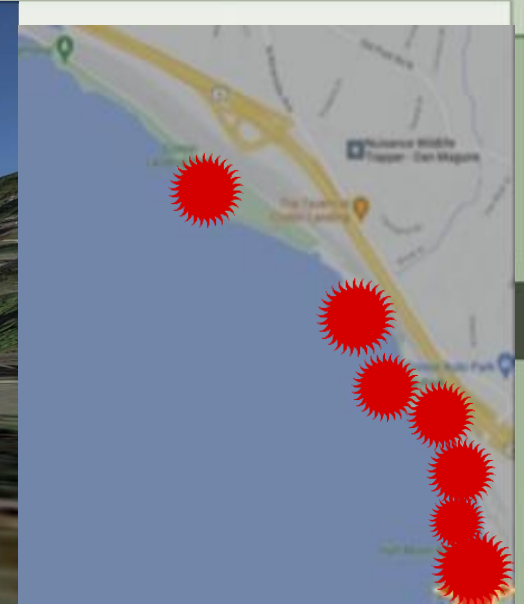
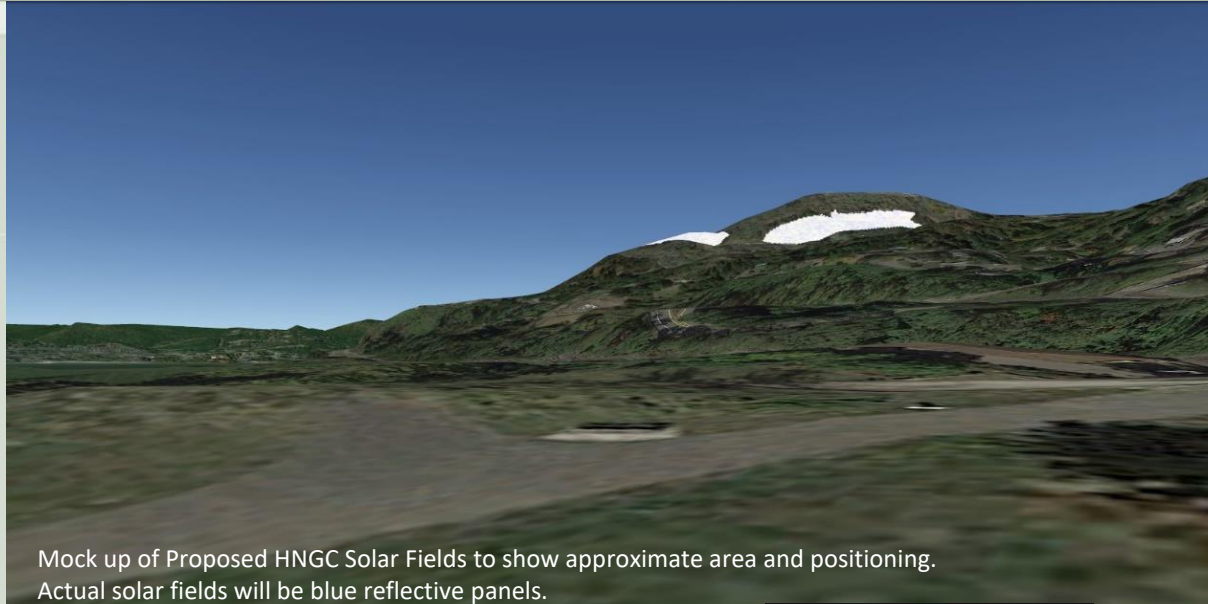
**CHOOSE ANOTHER SITE!!!**



# HNGC's Proposed Solar Farm is NOT Environmental!

Visual Pollution

Widespread  
Viewshed  
Along Scenic  
Croton Waterfront



\*Full View Study can be obtained at [susan@susanealer.com](mailto:susan@susanealer.com)


**CHOOSE ANOTHER SITE!!!**



# HNGC's Proposed Solar Farm is NOT Environmental!

- The Approval Process is being rushed to meet an HNGC deadline without addressing vital concerns of homeowners and the Community.
- If the Board truly shares the underlying values of this Croton on Hudson Community in “**protecting the environment**” which is an essential component of our “**quality of life**” and “**delivering for the residents**” of this Community, then more input from the homeowners and residents of Croton needs to be solicited, heard, considered and advocated for before decisions are made and actions are taken that could cause irreversible damage to our environment and Community!


**CHOOSE ANOTHER SITE!!!**



# Critical Concerns Have NOT Been Addressed: Include Us... Hear Us... Advocate for Us!

- To date, the homeowners believe that they have been prejudiced by an approval process for the HNGC Solar Project that has not been transparent, inclusive, open or fair... and that the approval process has not been in the best interest of the residents of Croton ... All to their detriment!
- More time is needed before the Board holds a Vote to approve the HNGC Solar Project, because the homeowners and Community have not had access to complete and accurate information or the opportunity to have important concerns heard and addressed!
- The HNGC Solar Project offers a minimal benefit to Residents of Croton (10% reduction on electricity for approx. 170 homes)... but for years to come, neighbor homeowners are being asked to bear the risk of possible storm flooding and erosion, and the Croton Community, at large, to bear significant environmental setbacks, ecosystem damage, loss of invaluable currently protected woodlands and wildlife, and a blight on its invaluable, intangible precious scenic views!!

**CHOOSE ANOTHER SITE!!!**




# Critical Concerns Have NOT Been Addressed: Include Us... Hear Us... Advocate for Us!

- Affected homeowners and the Community have been prejudiced, at times, by the insufficient and incomplete documentation that was posted prior to Public Hearings and Board Meetings, making it impossible for the homeowners and Community, at large, to give informed feedback to the critical issues of the proposed HNGC Solar plan.
- Affected homeowners and the Community have been prejudiced by the process that has allowed for HNGC to make ongoing unsubstantiated representations that were not scrutinized by the Board and enabled HNGC to bypass conducting critical studies and testing that would ensure that homeowners and the Community could rely on statements made relating to key aspects of this project.
- Affected homeowners and the Community have been prejudiced by the process of Public Comment, when allowed, by being strictly limited to 5 minutes each person, while HNGC has been given unlimited time, both to present and to refute, often with inconsistencies and inaccuracies, with no ability of the homeowners and Public to re-address or push for clarification!

**CHOOSE ANOTHER SITE!!!**






# Critical Concerns Have NOT Been Addressed: Include Us... Hear Us... Advocate for Us!

- Homeowners have been prejudiced by being denied the ability to have their retained Experts, such as their Civil Engineer, be allowed to speak at Board meetings, and for those experts to be provided with project documents with sufficient time to review them before Public Hearings.
- Homeowners have been prejudiced by Advisory Committees that have glossed over, or simply rubber-stamped, critical, known, inaccuracies made by HNGC regarding impacts of the HNGC Solar Plan on the homeowners and Community, allowing a practice of inaccuracies by HNGC throughout this process to continue to the detriment of the homeowners and the Community.
- Upon information and belief, the homeowners and Community believe they have been prejudiced by the existence of an apparent conflict of interest resulting from relationships within the Conservation Advisory Council and HNGC and an approval for HNGC without recusal of the conflicted individual, which should render CAC's approval of the HNGC Solar Project as compromised.

**CHOOSE ANOTHER SITE!!!**



# Critical Concerns Have NOT Been Addressed: Include Us... Hear Us... Advocate for Us!

- The homeowners from Prickly Pear Hill have been prejudiced by the Board, against its own stated intentions, allowing HNGC to conflate the HNGC Maintenance Yard Project (that was approved earlier this year), with the HNGC Solar Array Project, as these are two separate Prickly Pear Hill projects based on two separate proposals with separate and distinct impacts.
- The homeowners and the Public have been prejudiced as a result of the Board lumping together the HNGC Maintenance Yard and Solar Array Projects, in that by doing so at this late stage, the Board is denying the homeowners and Public the chance for detailed review and discussion of impacts and mitigation strategies. The Solar Array Project is not part of the Maintenance Yard discussion, and thus, despite HNGC's assertions, the impacts of the Solar Array Project need to be discussed, comments taken and remediated in their own forum and not combined.
- In addition, without permission of homeowners from Prickly Pear Hill, survey crews encroached on their properties in order to gain access to take measurements of the site.

**CHOOSE ANOTHER SITE!!!**



# Responsible Solar in Croton is Choosing a more Responsible Site for HNGC Plan!

- Many municipalities are now rethinking prior decisions that allowed deforestation and clear cutting for Big Solar!
- Massachusetts and other states are now establishing tighter restrictions to require consideration of Solar installations on buildings, carports, parking lots, etc., as this is more Responsible Solar than continuing the decimation of valuable and irreplaceable wooded lands.

# Responsible Solar in Croton is Choosing a more Responsible Site for HNGC Plan!

## Links: Responsible Solar

- **The Green Roller Coaster**

Companies like Six Flags are cutting down trees to make room for solar panels—and missing part of the point of environmentalism.

<https://slate.com/technology/2016/06/going-solar-isnt-green-if-you-cut-down-tons-of-trees.html>

- **Down to Earth: A Choice: Forest or Solar Panels**

<https://www.gazettenet.com/which-to-choose-forests-or-solar-20732082>

- **Utility-Scale Solar VS Trees: A Fight That Shouldn't Exist**

<https://earthtechling.com/utility-scale-solar-vs-trees-a-fight-that-shouldnt-exist/>

- **Planning for Utility-Scale Solar Energy Facilities**

<https://www.planning.org/pas/memo/2019/sep/>

- **Trees or Solar Panels: Environmentalists Question Georgetown's Solar Farm**

<https://wamu.org/story/19/02/07/trees-or-solar-panels-environmentalists-question-georgetown-s-solar-farm/>

- **Environmental Effects of Solar Energy: Harm to Wildlife Biodiversity**

<https://sciencing.com/effects-solar-power-farms-environment-13547.html>

- **Seven Keys to Developing Environmentally Friendly Solar Power in the Chesapeake Bay Region**

<https://www.cbf.org/issues/land-use/solar-power.html>





# Responsible Solar in Croton is Choosing a more Responsible Site for HNGC Plan!

## Links: Trees and Forests

- **Underground Networking: The Amazing Networks Beneath Your Feet**

<https://www.nationalforests.org/blog/underground-mycorrhizal-network>

- **Why You Should Plant Oak Trees**

[https://www.nytimes.com/2021/03/31/realestate/oak-trees-why-you-should-plant.html?mc=aud\\_dev&ad-keywords=auddevgate&gclid=EALalQobChMliMmM\\_7X28wlVsYpaBR1Xjwp8EAMYASAAEgJi1vD\\_BwE&gclsrc=aw.ds](https://www.nytimes.com/2021/03/31/realestate/oak-trees-why-you-should-plant.html?mc=aud_dev&ad-keywords=auddevgate&gclid=EALalQobChMliMmM_7X28wlVsYpaBR1Xjwp8EAMYASAAEgJi1vD_BwE&gclsrc=aw.ds)

- **The Hidden Life of Trees: What They Feel, How They Communicate – Discoveries From A Secret World**

[https://www.amazon.com/Hidden-Life-Trees-Communicate\\_Discoveries-Secret/dp/1771642483/ref=tmm\\_hrd\\_swatch\\_0?encoding=UTF8&qid=1635743315&sr=8-3](https://www.amazon.com/Hidden-Life-Trees-Communicate_Discoveries-Secret/dp/1771642483/ref=tmm_hrd_swatch_0?encoding=UTF8&qid=1635743315&sr=8-3)





# HNGC's Proposed Solar Farm is NOT Environmental!

- Critical and, as of yet unanswered, questions and concerns relating to the HNGC Solar Project remain.
- Notwithstanding this, if the Board still decides to continue going forward with HNGC's plan despite the significant environmental and other issues, rather than looking for guidance from those municipalities that have determined that the better course is to direct siting away from valuable forest lands and to more suitable sites, in order to obtain the benefits of both the Solar renewal energy and the invaluable forests, then the homeowners are requesting the following so that a thorough assessment can be made and that the homeowners are then allowed to review and make comments in a more participatory and thorough manner:
  - That this plan be denoted as a **TYPE 1** action under SEQRA, necessitating a **full Environmental Assessment Form** (not the short form that was submitted) and a **full Environmental Impact Study** and that the homeowners and the Public will be able to review and comment at a hearing.
  - That any approved plan adequately addresses Erosion and Storm Water Drainage, with a **Post-Construction Storm Water Erosion Control Plan** put into place, and that the homeowners' own civil engineer should be given the opportunity to review all such finished plans and to submit comments, including in person at Board and other meetings, prior to any of the plans being approved.



# HNGC's Proposed Solar Farm is NOT Environmental!

- That a **full, updated tree survey of the entire HNGC property** is conducted, with notification and approval before any additional trees are removed.
- That the Solar Farm should be required to be screened from the Public's and neighbors' view on all sides through installation of a **Screening Plan** consisting of berms, heavy and dense vegetation, trees (at least 10' tall) and wooden (not chain link) fencing allowing for movement of animals, in a buffer that's a minimum of 50' and wooden (not chain link) fencing, with sufficient wildlife corridors placed throughout the array fields for ease of the animals crossing. The Screening Plan, including all such screening, fencing and corridors, will be backstopped by a **maintenance bond** sufficient to maintain and replace the screening, fencing and corridors for the life of the solar farm, with the sufficiency of such bond to be **reassessed for adequacy every 5 years**, and will be binding on the current and future solar farm owners.
- That a comprehensive **Reforestation Plan** at least to the level of pre-Solar Plan level, **Decommissioning Plan** and **Safety fire plans** be created in accordance with all regulations and that all such plans, including the Post-Construction Storm Water Erosion Control Plan adequately backstopped by **maintenance bonds** sufficient to maintain and replace for the life of the solar farm with the sufficiency of such bonds to be **reassessed for adequacy every 5 years** and will be binding on the current and future solar farm property owners. And, that an **additional maintenance bond** to cover any possible **remediation of impact to the viewshed, to wildlife and birds**, etc. will be required.
- That the homeowners' experts be given the **opportunity to review** all such finished plans and to submit **comments**, including in person at Board and other meetings, prior to any of the plans being approved.

**CHOOSE ANOTHER SITE!!!**

# HNGC's Proposed Solar Farm is NOT Environmental!

If HNGC's application is approved and a final permit is issued, the homeowners request strict and regular enforcement of all terms of the final permit, in light of HNGC's past history of renegeing on other commitments. The resources, property and risks to the homeowners are considerable and far outweigh any benefits to them, and the homeowners and Community are looking to the Board to ensure that if it does decide to approve HNGC's application, that the Board will put into place sufficient oversight to ensure diligent and timely performance from HNGC.



**CHOOSE ANOTHER SITE!!!**



**From:** John Ealer

**Sent:** Wednesday, November 3, 2021 12:57 PM

**To:** Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>; Bryan Healy  
<[bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)>

**Cc:** Susan Ealer

**Subject:** HNGC Solar Project Consistency Review

Dear Mayor Pugh and the Board of Trustees,

Please find attached very important items to consider as you approach tonight's meeting.

Since the Board indicated that public comment could be given after the public hearing was closed, I respectfully ask that this be added to the record of the public hearing.

Thanks again for all your support and service,

Best,

John Ealer

JOHN EALER  
5 PRICKLY PEAR HILL ROAD  
CROTON-ON-HUDSON, NY 10520  
[john@johnnealer.com](mailto:john@johnnealer.com)  
310.403.5646

Dear Mayor Pugh and the Board of Trustees,

The critical question as you perform the Environmental and Consistency Review of the HNGC Solar proposal is the one put to you, in Part Two of the EAF, as lead agency under SEQRA (clipping of form below, highlighting is mine):

**Part 2 is to be completed by the Lead Agency.**

Answer all of the following questions in Part 2 using the information contained in Part 1 and other materials submitted by the project sponsor or otherwise available to the reviewer. When answering the questions the reviewer should be guided by the concept "Have my responses been reasonable considering the scale and context of the proposed action?"

This burden of responsibility is high, considering the scale and context on the proposal and it's powerful impact on the land, our neighborhood and the community as a whole.

So, as you make your review and answer the form's questions like, "*Will the proposed action create a material conflict with an adopted land use plan or zoning regulations?*" I respectfully submit that you have no choice, under the law, but to indicate at least a moderate impact. Below is a clipping of at least five questions that merit a "moderate to large impact" response. (check marks are, of course, mine.)

	No, or small impact may occur	Moderate to large impact may occur
1. <u>Will the proposed action create a material conflict with an adopted land use plan or zoning regulations?</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. <u>Will the proposed action result in a change in the use or intensity of use of land?</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. <u>Will the proposed action impair the character or quality of the existing community?</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. <u>Will the proposed action result in an increase in the potential for erosion, flooding or drainage problems?</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. <u>Will the proposed action create a hazard to environmental resources or human health?</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

At this point, it's no longer acceptable just to accept the applicants misstatements about the environmental impact, let them slide, or even correct them. Misstatements like the applicant's assertion, in their Part 1 of the EAF, that there would be no change in the predominant character of the built landscape, that there would be no storm runoff onto adjacent properties, or that the types of habitats on the site are just suburban – ignoring the fact that that the area is a forested non-disturbance zone (clippings of form below).

6. Is the proposed action consistent with the predominant character of the existing built or natural landscape?	NO	YES
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

14. Identify the typical habitat types that occur on, or are likely to be found on the project site. Check all that apply:
<input type="checkbox"/> Shoreline <input type="checkbox"/> Forest <input type="checkbox"/> Agricultural/grasslands <input type="checkbox"/> Early mid-successional <input type="checkbox"/> Wetland <input type="checkbox"/> Urban <input checked="" type="checkbox"/> Suburban

17. Will the proposed action create storm water discharge, either from point or non-point sources?	NO	YES
If Yes,	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. Will storm water discharges flow to adjacent properties?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Will storm water discharges be directed to established conveyance systems (runoff and storm drains)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If Yes, briefly describe:      A Stormwater Plan is provided		

And It's no longer acceptable for the village's review bodies to simply correct misleading statements by the applicant, as occurred in the WAC review of the LWRP. The bar of responsibility under SEQRA is far too high so simply change the applicant's assertions of "no" impact to "yes." (clippings below, with my highlighting):

**Page 2:**

**C. COASTAL ASSESSMENT:**

1. *Will the proposed action be located in...* "NO" should be changed to "YES"
- b) *Scenic resources of local or statewide significance?* "NO" should be changed to "YES" because the scenic resources are of local significance.

**Page 3:**

- 2b: **Will the proposed action have a significant effect upon:** *Scenic quality of the coastal environment?* "NO" should be changed to "YES"

**Page 4:**

**4. Project**

d) *Does the present site offer or include scenic views or vistas known to be important to the community?* “NO” should be changed to “YES”.

g) *Does any mature forest (over 100 years old) or other locally important vegetation exist on this site which will be removed by the project?* “NO” should be changed to “YES”.

It's time, as the law directs us, to be “reasonable considering the scale and context of the proposed action.”

Otherwise, we will all pay the penalty for decades as the applicant's assertion of “no impacts” become indelibly clear “yes”-es on our landscape, on our runoff, on our viewshed and on our community as a whole.

We need a full Environmental Impact Statement. It's not too much to ask – it's, in fact, what the law requires.

Thanks for all your diligent service to the community,

A handwritten signature in blue ink, appearing to read 'J. Ealer', with a stylized, cursive script.

John Ealer



Submitted on Wednesday, November 3, 2021 - 1:47pm

Submitted values are:

Choose One: Public Comments for Board Meeting

Please include any questions or comments:

Hudson National Golf Club should not be granted a special permit for the proposed solar farm. The benefit to Croton is sketchy at best and to trade 477 mature trees does not make sense.

As a homeowner in Croton I applied for the lousy \$10 off my bill only to be buried in details. Exactly what is the benefit to HNGC versus the 200 homeowners that may apply in the future.

Some entity will make a lot of money and it will not benefit the Village of Croton.

Step up and deny the special permit.

George Wieland 41 E

==Please provide the following information==

Your Name: George Wieland

==Address==

Street: 41 Elmore Ave

City: Croton on Hudson

State: New York

Zipcode: 10520

**From:** Samantha Moeller

**Sent:** Wednesday, November 3, 2021 2:46 PM

**To:** Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>; Ann Gallelli <[agallelli@crotononhudson-ny.gov](mailto:agallelli@crotononhudson-ny.gov)>; Sherry Horowitz <[shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)>; Ian Murtaugh <[imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)>; Len Simon <[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)>; Bryan Healy <[bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)>

**Subject:** Please reconsider

To the Village Board,

I urge you to deny Hudson National Golf Course's attempt to demolish 12 acres of trees in an attempt to build solar panels. They already have plenty of land that is leveled and can be used for solar panels. They have parking areas that can support solar panel carports. They have a 22,000 sq ft clubhouse that can support solar panels.

There is no logical reason to deforest the area just to add solar.

It only makes the Village residents think that the Croton Board is receiving some extravagant kickbacks to pass this through.

As seen in the past few weeks, one man has made quite an impact on the people of this village, and has single handedly taken many votes away from the Mayor and Trustees. I believe, you will see a much larger portion of the population turn on you in the next election if you let Hudson National get away with this deforestation.

Sam

**From:** Sioux Madden

**Sent:** Wednesday, November 3, 2021 3:19 PM

**To:** Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>; Ann Gallelli <[agallelli@crotononhudson-ny.gov](mailto:agallelli@crotononhudson-ny.gov)>; Sherry Horowitz <[shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)>; Ian Murtaugh <[imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)>; Len Simon <[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)>; Board of Trustees <[boardoftrustees@crotononhudson-ny.gov](mailto:boardoftrustees@crotononhudson-ny.gov)>

**Subject:** HNGC

Dear Mayor and Trustees,

As a 10+ year resident of beautiful, green Croton-on-Hudson, I request that the Board vote **no** or relocate the HNGC project. I do not support hundreds of trees being clear cut by Hudson National Golf Course for solar panels. The very idea is abominable.

Thank you,

Sioux Madden

67 Maple St

**From:** Catherine Harris-Konkol

**Sent:** Wednesday, November 3, 2021 3:20 PM

**To:** Bryan Healy <[bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)>; Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>; Sherry Horowitz <[shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)>; Ian Murtaugh <[imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)>; Len Simon <[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)>; Ann Gallelli <[agallelli@crotononhudson-ny.gov](mailto:agallelli@crotononhudson-ny.gov)>

**Subject:** 3 November meeting - Harmon Parking and the golf Course Solar Project

Dear Major, Trustees, and Manager,

1. Harmon Parking - We live on Benedict, near Hastings, Why were Benedict residents not consulted in the parking survey and permit process? While the parking isn't bad, and I support parking for the businesses to have easy access to customers vs people parking all day, the documents seem to ignore the potential spill over effects to our street (plus probably Oneida). Further, there are occasions where it is hard for us to see because of cars parked out front all day, or hard for the bus and trucks/garbage truck to get through, or fewer spaces for delivery vehicles. It looks like it is a done deal with the permits, but I really think you should be including the residents of the surrounding streets in any parking discussions because the immediate impact of any restrictions on Hastings and Young will be on our street.

2. The proposed solar project at the golf course appears to be a terrible plan. I read the initial proposal and didn't take much notice of it, because it seemed so big and out of touch with the area and Croton's "pro-environment" values. Cutting down so many trees, on a steep hillside, above houses, does not seem very environmentally conscious. Further, if community comments are true, they don't appear to be a very good community stakeholder. Why can't they install solar over existing areas, such as rooftop carparks or their buildings? I would like to add my voice to their proposed solar project not going forward with the current scale and size.

Thank you,  
Catherine

121 Benedict



**From:** Jeff Blazek

**Sent:** Wednesday, November 3, 2021 3:25 PM

**To:** Brian Pugh <[bpugh@crotononhudson-ny.gov](mailto:bpugh@crotononhudson-ny.gov)>

**Cc:** Ann Gallelli <[agallelli@crotononhudson-ny.gov](mailto:agallelli@crotononhudson-ny.gov)>; Sherry Horowitz <[shorowitz@crotononhudson-ny.gov](mailto:shorowitz@crotononhudson-ny.gov)>; Ian Murtaugh <[imurtaugh@crotononhudson-ny.gov](mailto:imurtaugh@crotononhudson-ny.gov)>; Len Simon <[lsimon@crotononhudson-ny.gov](mailto:lsimon@crotononhudson-ny.gov)>; Bryan Healy <[bhealy@crotononhudson-ny.gov](mailto:bhealy@crotononhudson-ny.gov)>

**Subject:** Opposition to HNGC Solar Plan -- Please Delay Today's Vote

Brian,

As a resident of the Village and the Arrowcrest subdivision, I would like to request that you please delay today's vote regarding the HNGC Solar Plan. I also serve as HOA President for Arrowcrest, and have received a number of inquiries of concern regarding this proposal. There are a number of questions about environmental impact, runoff implications, and the impact the solar installment would have on ruining views from a number of points in our community.

I hope that you choose to allow further time for discussion and completing more work to understand this significant project by delaying the vote, and look forward to discussing further.

Regards,  
Jeff



The International Corporate Center, 555 Theodore Fremd Avenue, Rye, NY 10580

Telephone: 914.381.7600 · [www.dorflaw.com](http://www.dorflaw.com) · Facsimile: 914.381.7608

November 3, 2021

**VIA E-MAIL**

Mayor Brian Pugh and Members  
of the Board of Trustees  
Village of Croton-on-Hudson  
One Van Wyck Street  
Croton-on-Hudson, NY 10520

**Re: Hudson National Golf Club/Matrix Development -Solar Project**

Dear Mayor Pugh and Trustees:

I represent the residents of Prickly Pear Road adjacent to the Hudson National Golf club. I am writing in connection with your ongoing review of the above captioned proposed project and your role as lead agency under the State Environmental Quality Review Act (SEQRA).

The submissions by the applicant thus far are woefully inadequate for you to make a proper determination as to the viability of this project or to ascertain any benefits for the community in return for permitting the destruction of almost 7 acres of land in a previously designated no disturbance area.

Your designated consulting engineers, The Chazen Companies submitted a memo to your Board identifying numerous substantial deficiencies in the current submissions. In addition, your staff submitted a memo on “application completeness status” that indicates the application is substantially incomplete.

The Chazen memo comments raise serious questions about this proposed project.

Comments #3 and 4 requires grading which thus far has not been provided. Steep slopes are present and impacted which are required to be evaluated under SEQRA. Applicant has ignored this entirely.

Comment #9: What are the foundations of the proposed panels? What are the stormwater runoff impacts and the visual impacts of hundreds of these foundations?

Comments #11 and 14: Erosion controls not properly identified, no SWPP submitted or whatever was submitted is incomplete.

The Habitat Assessment is virtually non-existent. No serious effort was made to identify local species and evaluate the impact on them. Denuding a large forest of 7 acres of trees will impact local wildlife and exacerbate stormwater runoff problems. This needs to be analyzed in far greater detail than provided so far.



In spite of the Golf Club's desire to rush this through the approval process, this is a big project with significant environmental issues. We believe this warrants a positive declaration under SEQRA which would then require a draft environmental impact statement that would provide you as lead agency with all the information you will need to make an informed decision. A DEIS will have to analyze ALL the environmental impacts and propose mitigation measures to address them. That process would both provide the applicant with clear direction and protect the community at the same time. At a minimum a long form EAF should be required along with a proper and thorough analysis of the issues Chazen raised in its October 29, 2021 memo.

We appreciate that the Club will derive significant revenue from the lease and will get the benefit of the cheaper electricity if it materializes. We cannot fathom what possible benefit derives to the community as a result of the destruction of 7 acres of trees and resulting damage to the scenic vistas, local wildlife and nearby properties who will all bear the burden of this proposal.

Please make this letter a part of the public hearing record on this application.

Thank you for your consideration.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'P. Noto', enclosed in a rectangular box.

Paul J. Noto

HALLIE FLANAGAN WOLFE

*Gardens, Ltd.*

1380 Spring Valley Road  
Ossining, New York 10562  
(914) 941-5331

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2021 NOV -3 PM 3:49

CROTON-PT-HUDSON N.Y.

November 2, 2021

Cutting trees on a steep slope. A very bad idea.

These are not just trees, they are a community of plants, insects and animals; a biome. Killing the trees will destroy that biome and it is that community which is holding back erosion, not merely the tree roots.

The leaves which fall from the trees in the autumn create water bars in a heavy rain, redirecting the water so that it does not create a straight channel down the hillside. The leaves, broken down by insects and worms provide nutrient for understory shrubs and plants whose roots also prevent erosion. The reptiles, birds and mammals who feed on plant materials and find shelter under the leaf mould also provide nutrients to the soil through their leavings.

Removing those trees, even if the roots are left, exposes the soil to erosion with the first rain since the protective canopy no longer exists and since the heavy machinery needed to remove the trees will churn up the soil.

Plant a meadow as a replacement? Planting a meadow requires first applying massive amounts of weed killer to the area before force seeding the now bare ground. This was recently done on Croton Point and it would be worthwhile checking out what that cost. Further more, at Croton Point there is already a system in place for capturing toxic run off. How would that be handled in Croton?

Once a meadow is planted it requires twice yearly mowing and constant monitoring for invasive weeds such as mugwort which can overgrow it in a few years. Lastly, meadows require full sun, how successful would it be growing under acres of solar collectors?

Cutting hundreds of trees to provide a space for solar collectors will create an environmental disaster that the village of Croton will regret and very possibly pay for for years to come.

Sincerely,



Hallie Flanagan Wolfe