

Since this letter was written the Village Board of Trustees has continued to ignore public opinion, coddle the Hudson National Golf Club representatives and preparing to vote saying there would be no significant impact. *That vote could take place tonight December 20th at 7PM* paving the way for them to approve the project on January 4th.

Your comments, and attendance at tonights meeting are critical to stopping this fiasco.

Click tis link for more information <https://bit.ly/3yF1INn>

TRADING TREES FOR SOLAR IS THE WRONG CHOICE - FOR THE ENVIRONMENT AND FOR YOUR POCKETBOOKS.

To make space and light for a solar field, Hudson National Golf Course and its developers propose to cut down nearly 600 hundred healthy, mature trees. Trees that are already sequestering carbon every year!

In return for that sacrifice, yes, clean power will be generated. But the Hudson National Golf Course will get most of it. In the Croton community, under 200 customers will get a tiny discount on their monthly power bills. The rest of us could be stuck with paying for the impacts of this ill-conceived project for decades.

Because almost all of the benefits of this project go to an elite private establishment that pays almost no taxes compared to local homeowners. Meanwhile, the profound impacts of the project - on the environment, on wildlife habitat, on our landscape - are borne by the community at large.

Moreover, the Village Board has not asked for a full Environmental Impact

Statement (EIS), as is their right - and, for a project this size, and potential damaging impact, duty - to demand. There are environmental red flags all over this project that should trigger an EIS, but none is forthcoming. And, in fact, **the Village's own Conservation Advisory Council voted not to endorse this project by 6 -0.**

It's time to stop the greenwashing and realize the only thing green in this project is the money Hudson National will make from it.

1. NEARLY 600 TREES TO BE CUT DOWN FROM A HEALTHY FOREST

Trees sequester CO2 - it's one of their most important ecological functions.

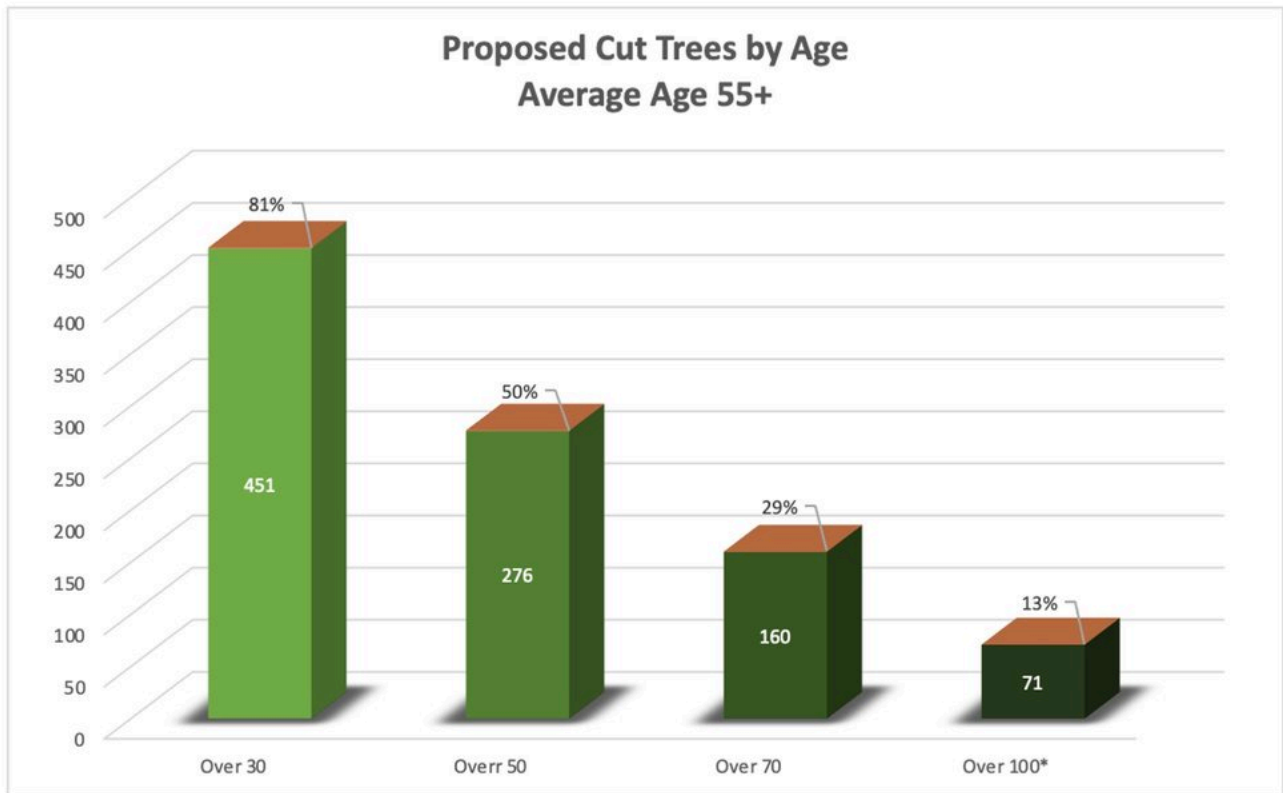
While solar power will reduce carbon in the atmosphere as well (yes, we admit, the panels will "save" more carbon than the forest over the long run) - **choosing between forests and solar is a FALSE CHOICE - and the WRONG CHOICE.**

There are acres of parking lots, roof tops, and already cleared land available not only at the Golf Course but throughout Croton for "win-win" solar development.

More importantly, **the developers of this solar site have routinely mischaracterized the area** to be cleared as an unhealthy, dying scrub forest, when in fact the ecosystem is doing just fine, with many mature trees over 100 years old - and one tree over 200 years old.

Finally, to date the developers have not provided the required plan on how they'd restore the forest when the solar facility is decommissioned.

Here's a breakdown of the trees that will be cut down if the project moves forward. The average age of the trees is over 55 years. Far from a "scrub forest." (FYI - it's not an old-growth forest, which basically don't exist anymore on the East Coast. This is a second-growth forest like most of the forests in Westchester, New York State, and the Eastern U.S., filled with native hardwoods.)



2. THE TREES ARE IN A NO-DISTURBANCE AREA

Hudson National Golf Course was created in 1999 to protect this scenic hillside from large-scale development, a wise move by the Village Board to protect the rural identity of our community. In 1999, As part of the permit and environmental management plan that authorized the golf course development, the area where the solar field is now proposed was designated a NO-DISTURBANCE area.

What does that mean? The original permit language is very clear: "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."

Now, twenty years later, after the Hudson National has expanded its footprint with a new driving range, lodging and a long-unpermitted maintenance yard (a situation they've rectified), they now asking the village to roll back the No-Disturbance protection of the environment that was an essential part of their Environmental Management Plan in the first place.

This kind of incremental development will erode Croton-on-Hudson's unique personality as Tree City, U.S.A., until we become "Anywhere-on-Hudson."



3. THE AREA IS NOT WITH WILDLIFE

The proposed solar field is in the heart of one of the most environmentally sensitive parts of Croton-on-Hudson. It's adjacent to Audubon-protected areas and is near Brinton Brook Sanctuary, as well as the Jane E. Lyle Arboretum.

What kind of wildlife have we witnessed in the area? **Bald Eagles. Bobcats. Hawks. Owls. Wild Turkeys. Snakes. Herons. Deer.** Just to name a few.

By the way, Westchester lists the bobcat as an animal of "special concern" on its endangered animals website.

Plus, the trees to be cut down are potentially critical habitat to **the endangered Indiana Bat.**

					HERONS BUTTERFLIES BOBCATS FOXES WILD TURKEYS CHIPMUNKS EAGLES DEER SWANS SNAKES TURTLES GROUNDHOGS OWLS FROGS SQUIRRELS

Stop The Destruction of Croton's Wildlife Habitat on Prickly Pear Hill !

Tell the Village Board not to let HNGC Build in a No-Disturbance Zone

**ALL PHOTOS TAKEN ON SITE - COURTESY OF YOUR FRIENDS ON PRICKLY PEAR HILL

The upshot: solar that fractures important wildlife habitats is not environmentally sound.

4. OVER HALF THE SITE IS ON VERY AND EXTREMELY STEEP SLOPES

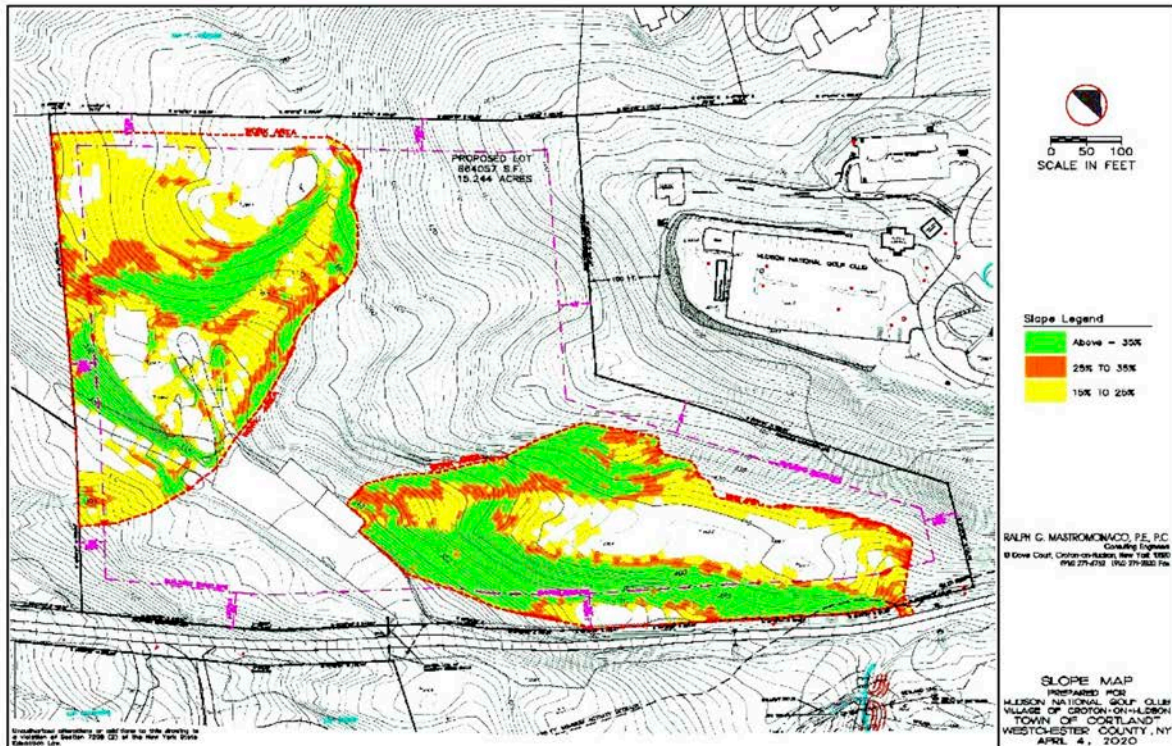
Steep slopes matter. A lot! The trees on them naturally help stabilize the soil, control stormwater runoff and erosion. Take those trees away and stormwater flows can skyrocket as can erosion, leading to mudslides, especially as climate change throws bigger storms at us.

The Hudson National's current plan is to cut down the trees, leaving the rootballs in place to stabilize the steep slopes. Once those trees are dead, those roots, like the rest of the tree, decay, and their grip on the soil diminishes.

This solar field is planned to be in place for at least 25 years. How much soil erosion will those decayed tree roots be preventing then? It's not clear to us that anyone knows for sure, but common sense suggests very little.

The Village - and its taxpayers - will then be left footing the bill to respond to the drainage and erosion nightmare this will cause in the stormwater system.

The map below indicates the two areas (circled in red) to be developed into the solar site. **All the colored areas on the map below are steep slopes.** For a point of reference. New York State's own Solar Guidebook for Local Governments stipulates as its first design consideration the "avoidance of steep slopes.



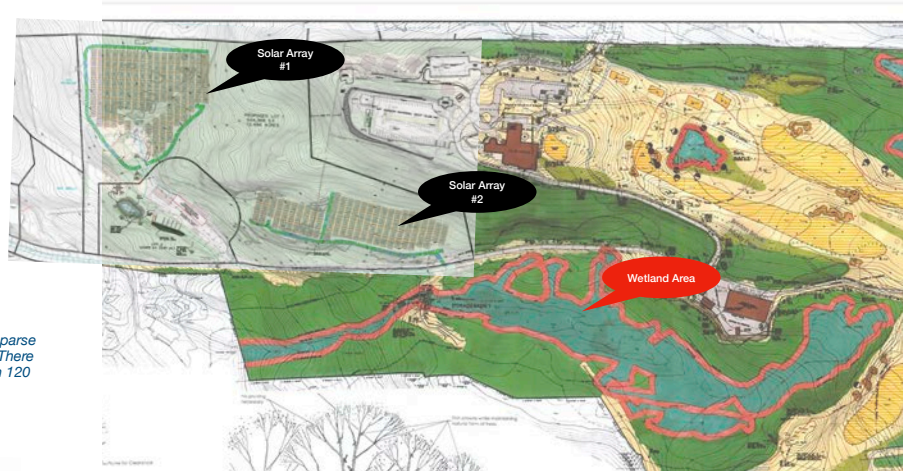
3. THE SITE IS ADJACENT TO CRITICAL WETLANDS

The solar arrays are in very close proximity to critical wetland areas that help support the rich variety of wildlife in the area. Hudson National claims that it doesn't matter because the wetlands are not within 120 feet of the solar fields. But without a full Environmental Impact Statement, the impact of torrential downpours and increasingly fierce storms flowing down steep steep slopes after cutting nearly down nearly 600 hundred tree near the wetland areas remains unknown. Our wildlife deserves better.

Proximity of Solar Array #2 to Wetland Area

Hudson National Golf Club Limited Activities

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 for the construction and apportion of The Hudson National Golf Club.



Matrix LLC/Hudson National Golf Club SWPPP/Storm Water Protection Plan, Jan. 25, 2021

"The site is fully wooded with some sparse open areas with good ground cover. There are no wetlands on the site nor within 120 feet of the proposed installation."

General Notes:

All restricted activities areas relate to the existing course layout as shown on this plan. Changes to the course layout or maintenance procedures may involve additional areas of limited activity. These may require Village review. See EMP pg. 106.

- Legend:**
- Tees, greens and chp zones
 - Fairways
 - Rough, native grass, etc. See EMP pg. 18.
 - Wetland divides (1)
 - Rilled edge (see graphics) See EMP pg. 89.
 - Water Quality Basin
 - Water Quality & Storage Basin
 - Water Control Collection/Regulated Area
 - Wetlands/Waterbody/Watercourse
 - 20' R. Restricted Buffer See EMP pg. 18, 22, 91 & 97.
 - 25' R. Registered Hole Strip See EMP pg. 18, 21, 83 & 86.
 - 100' R. Limited Activities Zone

- Legend:**
- No Disturbance**
These are areas in which the natural process of succession to a mixed hardwood forest shall be allowed to progress unimpacted by golf course activities. Wildlife habitats shall develop and evolve unaltered and unimpeded.
 - Upland
 - Wetland
 - These areas consist of terrain and vegetation which have not been directly impacted by the golf course construction as well as areas which have been cleared or reggraded and replanted as part of the remediation and mitigation upon which the golf course construction approvals were conditioned.
 - These areas shall receive no maintenance activities without prior Village Planning Board or WCC approval, as applicable. There shall be no partial or complete removal of vegetation such as brushing, thinning, pruning, limbing, or topping, except as illustrated within these areas. See graphics.
 - No play areas designated on the course by green-topped stakes. Balls landing in these areas are to be left. Ball removal shall take place only during the regularly scheduled January and August maintenance periods. See EMP pages 18 and 99.

- Legend:**
- Limited Disturbance in Wetland Playover Areas**
These areas shall receive periodic maintenance on an as needed basis only. Maintenance shall be for the purpose of retaining the necessary lines of sight between the tees and the landing areas of holes where play crosses wetlands. See graphics.
 - Pruning and limbing criteria within designated playover areas has been designed to allow two or more seasons of growth between necessary maintenance. Pruning heights shown in the activities sketch indicate the removal of obscuring growth four feet below the maximum allowable height. Each plant shall be pruned to a natural shape, rather than sheared to a fixed height. All maintenance shall be done with hand tools. See EMP page 18.
 - Partial Maintenance within Wildlife Corridors**
These are narrow strips of vegetation between fairways and areas adjoining large blocks of vegetation. Their ecological function is to provide pathways along which wildlife can move in relative safety from predators and human disturbance. They also function as rest stops for wildlife crossing fairways. However, due to the proximity of play areas and the consequent need to maintain a level of playability, these areas will have limited maintenance.
 - These areas are outside of the normal roughs, but remain within the bounds of play. They will be maintained as native grass areas and mowed once or twice each year. This will effectively prevent woody shrubs and trees from becoming established here. The trees, both canopy and understory or ornamental species will receive only limited maintenance. This shall be restricted.

6. THE APPLICATION FOR THE PERMIT IS FILLED WITH INACCURACIES AND MISLEADING STATEMENTS.

There's a reason we don't trust the information from the developer and double check everything ourselves. Both written documents and in-person comments are replete with false and misleading information.

Below are some simple questions that the applicant answered incorrectly on their Environmental Assessment Form, potentially to understate the impact of the solar field on the environment.

#6 asks simply if the development is consistent with the existing landscape. The developer answered yes. Seriously?

#14 asks the habitat types on the site. The applicant indicated suburban. A forested no-disturbance zone adjacent to wetlands is anything but suburban.

#17A asks if stormwater discharges will flow to adjacent properties. The developer answered no, even though the site is directly uphill from a large number of local homes.

On other forms, we've found math errors and miscalculations that downplay the area of steep slopes to be disturbed.

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? If Yes,	NO	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)? If Yes, briefly describe: A Stormwater Plan is provided	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7. A VIEW TO BE KILLED?

At first Hudson National said the solar fields would not be seen, it would just look like some trees were missing. Then they insisted that the solar field will only be seen from a few places in town. Because their other documentation has proven to be less than robust, we've asked the Village for a 3D model of the proposed site to verify impacts on the view shed. Since we're still waiting on a final answer on that request, we had a licensed architect look for other places where the solar field will be visible.

Guess what - anyplace between Croton Point and Senasqua Park will likely see the solar fields even though they are some distance away from those spots. But

considering the original reason for the creation of the Hudson National was to PROTECT THE RIDGELINE around Prickly Pear Hill, the significant adverse impacts on the scenic views are important and worth serious consideration and shouldn't be brushed under the rug since they affect **the entire community!**



Hudson National's obfuscated rendition of the view from Croton Point Park.



The same view with the solar arrays highlighted to better illustrate their visual impact.

8. THE CLOCK IS TICKING

This proposal and application for a special permit will soon come before the Village Board of Trustees for approval. Understandably and admirably, the Village wants to promote solar in our community. And so do we.

While solar is an admirable goal and worth sacrificing important things for, it's important to not that the Golf Course reaps all of the benefits and none of the impacts of this development. There are areas on the property that could easily accommodate solar generation, but instead they choose to exploit a no-disturbance zone.

In sum, solar:

That destroy's the environment

That tears apart the fabric of a habitat

That exposes the Village to long-term remediation costs

That benefits the golf course far more than anyone else

That hasn't been fully vetted according to the standards suggested by New York State law

That's been shrouded in inaccuracies

That will impact of landscape for generations

is not environmentally sound. We need to stop it - now.

Submitted by:

www.CrotonDeservesResponsibleSolar.org