

TOWN OF YORKTOWN CONSERVATION BOARD

Town of Yorktown Town Hall, 363 Underhill Avenue, Yorktown Heights, New York 10598, Phone (914) 962-5722

MEMORANDUM

To: Yorktown Town Board

From: Yorktown Conservation Board

Date: August 21, 2024

Re: Proposed Solar Law Changes

The Conservation Board has reviewed the proposed changes to the solar law and offers the following comments:

- The Conservation Board currently reviews all tree permit applications. The proposed solar law refers tree permits solely to the Tree Conservation Advisory Commission. The Conservation Board should be included as a mandatory referral.
- The Conservation Board has consistently recommended that these industrial projects be limited to already disturbed parcels, such as abandoned farm fields, with proper screening in order that the viewshed is not impacted. The wholesale removal of acres of trees, to site these systems, poses significant environmental impacts to wildlife, watersheds, and increases the fragmentation of forested lands. While the proposed changes have addressed setbacks and screenings, addressing limiting large scale, ground-mounted solar systems to previously disturbed parcels has not been mentioned in the revised proposal.
- The law doesn't require a rigorous enough analysis of the loss of forested woodlands. The function of woodlands is more than the sum of the trees, in replacement for carbon sequestration. Little attention is given to the broader impacts of environmental loss of woodlands in an ever-encroachment of open space. Mitigation in the form of payment into a tree fund is not a substitute for a forest that provides shelter and food for wildlife, connectivity of green spaces, and ecosystem services, the ability to filter water supplies, control floods and erosion, sustain biodiversity and genetic resources.

Respectfully submitted,
Phyllis Bock
Conservation Board Co-chair

Cc: Conservation Board Members