



May 22, 2025

Dear Members of the Town of Yorktown Board,

As a non-profit 501(c)(3) environmental organization partially situated within the Town of Yorktown, Teatown Lake Reservation offers the following comments on the proposed amendment to the Town of Yorktown Zoning Code Section 300-81.4 Solar Power Generation Systems and Facilities. We wish to express concerns with the proposed prohibition of large-scale solar energy systems on parcels located in residential zones.

As we are all aware, New York communities need to transition away from fossil fuels in order to mitigate climate change and meet the State's goal of achieving 70% renewably-sourced electricity by 2030. This requires extensive installation of renewable energy infrastructure across communities, but appropriately siting these installations can be tricky. In terms of solar energy infrastructure, the ideal location for these installations is clearly on existing impervious surfaces and built areas like on rooftops and over parking lots. However, we're finding that limiting solar projects to these areas is not always feasible or nearly enough to transition to renewables within the necessary timeframe.

There are many trade-offs involved in the transition to renewable energy sources, and several actions that help mitigate climate change can harm natural resource conservation and biodiversity. There are also climate mitigation actions that can simultaneously offer benefits to biodiversity, or even offer both biodiversity and social benefits. Hitting all three benefit areas – climate mitigation, biodiversity conservation, and social equity – is considered the best-case scenario when it comes to sustainable infrastructure. While we understand that the proposed amendment to Section 300-81.4 is well-intended to serve both the Town's residents and environmental goals, we are concerned that the proposed amendment, by prohibiting large-scale solar energy systems in residential zones, will too severely limit opportunities for well-designed renewable energy infrastructure projects that can provide these multiple benefits.

Siting a solar facility within an existing high-quality forest area or other ecologically intact habitat should clearly be avoided. But, not all green spaces are equal. While we do have expanses of high-quality forests and other habitat areas throughout Westchester County, we also have plenty of highly degraded undeveloped lands – dominated by invasive species and offering low habitat value and other ecological functions – and these spaces often occur within residential zones. Ecological restoration is a powerful tool to bring back native habitat and environmental function to highly degraded lands, but due to limited financial resources for restoration work, these highly degraded sites are typically passed over in favor of sites with fewer barriers to restoration success. We are therefore left to think about the highest and best use of these highly degraded undeveloped sites, taking into consideration the existing conditions and future land use possibilities. Given the urgency of the transition away from fossil fuels and the degraded nature of these low ecological integrity lands, a highest and best use could very well be conversion to sites of solar energy generation *so long as elements of ecological restoration and biodiversity enhancement are integrated into the projects*. Such elements could include invasive species removal, replanting with native pollinator-friendly plant species around solar photovoltaic panels, and planting native trees and shrubs within perimeter woodlands or along steep slopes. Under this scenario, an ecologically degraded site would be transformed in a way that not only mitigates climate change, but also supports native plant and pollinator communities and other ecosystem services. But, by putting a blanket restriction on large-scale solar energy systems in areas zoned for residential use, these opportunities for multiple environmental and community benefits will be lost.

We are concerned that the proposed amendment will become an obstacle to siting renewable energy installations in reasonable locations, further slowing the necessary transition away from fossil fuels. As an alternative, we suggest allowing for consideration of large-scale solar energy systems in each zoning area on a case-by-case basis *along with a requirement that elements of ecological restoration and biodiversity enhancement be incorporated* into solar energy installations proposed in existing undeveloped areas. The measurement and analysis of several site-specific conditions ought to also be required before making a determination that a well-designed renewable energy project is a desirable use for an undeveloped site, such as the carbon sequestration value of existing vegetation and other existing



environmental values like habitat provisioning, stormwater absorption, temperature regulation, steep slope stabilization, and rare species presence, as well as anticipated impacts on local residents. Additionally, a requirement could call for a percentage of anticipated income from renewable energy generation be put back into the ecological restoration of the project site. This would result in a win for climate mitigation, biodiversity conservation, and social benefits derived from these enhanced ecosystem services.

Rather than create a blanket restriction on large-scale solar energy systems in residential zones, these recommendations would create an opportunity for the design and implementation of best practices in solar energy system installation while still allowing for consideration of local impacts to residents.

Thank you for your consideration of our comments, and we welcome any further discussion.

Sincerely,

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