

February 9, 2025

Dear Chairman Lee and Town of Ulster Planning Board Members,

On February 11<sup>th</sup> you are scheduled to hear another presentation by Lightstar Renewables about their proposed project on the ridge above Route 9W.

As you are aware, on January 8, 2025, the County Planning Board deemed the project “problematic” and issued [a number of recommendations](#). In addition, they recommended a [moratorium on solar farms](#) until our zoning could be revisited, as well as so we have a chance to update our 1-year-old [Town of Ulster comprehensive plan](#) to include policies for solar farms since the term is never mentioned. (Lightstar’s own [EAF application](#) states that “a portion of this project may be located within a recommended ridgeline protection area” within the comprehensive plan.)

We strongly urge you to reject this proposed plan and recommend that the Town of Ulster Town Board reject it as well.

Even if Lightstar Renewables manages to modify their plan to be in compliance with the County’s recommendations, our comprehensive plan literally outlines why you, as the Town of Ulster Planning Board, should reject the proposal based on the ridgeline protections, as well as the following:

- [On page 34](#), the comprehensive plan stresses the importance of “reviewing potential adverse impacts.” As the town grows, the town needs to “pay closer attention to the protection of natural resources such as steep slopes, wetlands and water sources,” as well as “care must be taken” to protect important vistas to retain rural character.

Lighstar’s visual impact studies don’t include a glare analysis or vistas from farther down Route 209 heading east and looking Northeast. They have also admitted arrowheads were found on the site.

- [On page35](#), one of the key goals of the plan is to “avoid disturbance of environmentally sensitive areas, vistas” and to “give a guide to growth in areas best suited for development.” The plan details the topography of the town and warns about “destabilization of banks and erosion on steep slopes.” “Development on steep slopes should be avoided to mitigate erosion” and can mean higher construction costs, unstable soils, drainage and sewage disposal problems.

- [On page 36](#), the plan stresses that steep slopes are prevalent between, Route 32 and Route 9W and it warns against removing trees. “Development on steep slopes makes alignments and safe intersections difficult because of erosion and icing problems in the winter.”

- [On page 37](#), the plan highlights our water resources and calls out our limestone ridges between Rt. 32 and Route. 9W. “This area is characterized by small valleys, rocky outcroppings, wetlands and has a high water table and is **not suitable for development**. The town should take proactive protective measures with wetland and wellhead buffer zones. Protecting wetlands is most critical due to their extreme sensitivity to development. Wetlands help to reduce peak flows of run off during spring thaw and major storms.”

Plus, the plan says, “The Town of Ulster Planning board should be aware of DEC and Federal wetland inventory protected by the *Federal Clean Water Act* and must ensure all applicants adhere to standards.” Just this past January 2025, the [Freshwater Wetlands Act](#) passed giving special protections to freshwater wetlands that meet just 1 of 11 criteria.

The wetlands on this parcel meet 5 of the 11 criteria, including:

1. Located within a watershed experiencing significant flooding. (Lower Esopus Watershed)
2. Situated within or adjacent to an urban area, as defined by the US Census Bureau. (Kingston)
3. Provides critical habitat for essential behaviors of endangered, threatened, or special concern species, or species of greatest conservation need. (An eagle’s nest and various threatened bat species were found on or nearby the project site.)
4. Previously mapped by the department on or before December 31, 2024. ([See EnviroMapper](#))
5. Holds local or regional ecological significance (see comp plan notes above and below)

The plan also talks about erosion potential and soil quality, stating that, “the limestone ridges between Route 9W and Route 32 create complicated areas with poor drainage.” Lightstar’s own study shows that, “Type D Soils have a very low infiltration rate and high runoff potential when thoroughly wet. These soils consist chiefly of clays that have high shrink-swell potential, soils that have a permanent high water table, soils that have a clay pan or clay layer at or near the surface, and soils that are shallow over nearly impervious material. These soils have a very low rate of water transmission.”

In addition the project site’s slope is considered very steep at 35%. This means high runoff potential into the Esopus Creek and minor tributaries increasing our risk of being added to the [Impaired Bodies of Water](#) list by the DEC, of which the Upper Esopus is already included.

- [On page 42](#), the plan details forestland which defines our rural character, important wildlife habitat, and scenic vistas. Later in the plan, this specific Route 9W ridgeline is called out again as worth protecting from “**inappropriate development.**”

As you can see, regardless of whether the zoning changes in our Town, given the topography of this ridge, the studies that were conducted on this area back in 2007 are unequivocally resolute about safeguarding and protecting them for various reasons; whether that is for quality of life, safety or biodiversity.

Once again, our community asks you to deem this project ineligible to move forward and to make the recommendation to the Town Board to vote “no” when it comes up for a vote on the floor.

Thank you for your consideration,

Caylin Sanders  
Town of Ulster Resident /  
Esopus Creek Neighbors

cc: Town of Ulster Town Board