

February 17, 2025

Dear Town of Ulster Planning Board -- I wanted to address some of the claims that the representatives from Lightstar Renewables made at the Town of Ulster Planning Board meeting on February 11th, as well as some questions the board did not ask the applicants.

1. The Lightstar reps claimed that there would never be significant impacts to wetlands and wildlife as long as they create a 600-foot border. The DEC didn't factor in forest recharging of the water table or the fact that the site sits on a 35% grade, which our Town's Comprehensive Plan warns about. Was the DEC's own criteria of "the importance of the impacted environmental resource to the community" taken into account before issuing a determination? It doesn't appear so.

The Town Planning Board didn't ask them how the project will affect the soil, erosion or the water table - all things our Town's Comprehensive Plan outlines as sensitivities and needing protection on this very site.

The board asked them for a letter from the State Historic Preservation Office, but given verifiable arrowheads were found on the site, even if they pass Phase 1, it is imperative that a PHASE 2 study take place and that an excavation be done to remove any potential Indigenous remains, glyphs or other archeological finds that could be lost. It is entirely possible that the site could be considered a historic district under SHPO's Criterion D.

2. The Lightstar rep claimed that there would be "no visual impact," however they failed to show a visual long distance view from farther west on Rt. 209, heading east and looking northeast on 209 up to the ridge.

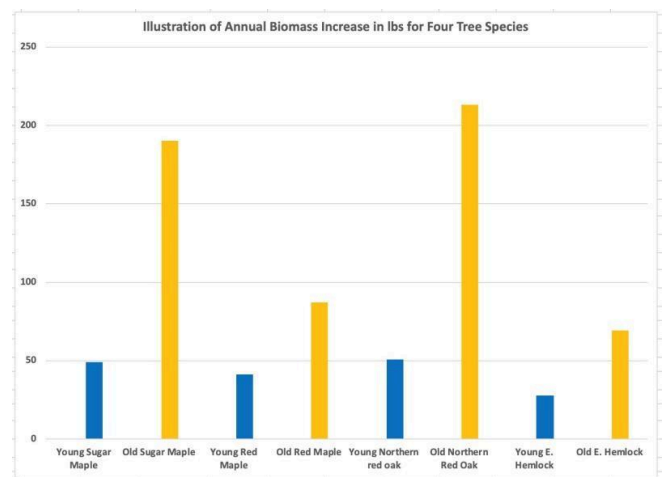
Also, one of the comments from the County Planning Board was that they wanted a visual study from the proposed 9W housing project onto the solar array, because they propose to go 4 stories high on the adjacent parcel. What the Lightstar reps failed to mention was that there are homes (or will be) within 100 feet of the proposed solar array that are within view.

According to [CEDS](#), "property prices for homes lying within 0.1 mile from a solar installation fall by 7.0%, compared to houses further away."

3. The Lightstar rep said that their project would offset the carbon equivalent of planting 55,000 saplings in an attempt to make a case for deforestation. That is a misleading claim.

To be very clear, saplings are NOT THE EQUIVALENT of old growth forest trees. Old growth trees like the red oak, can [sequester up to 8.8 times MORE carbon](#) than young saplings.

At 100 trees per acre, in a healthy old growth forest such as this, there are an estimated 2630 trees within those 26.3 acres. When the array is decommissioned in 25 years and if 2630 saplings are planted in its place, it will take 75-150 years for those trees to sequester the same amount of carbon that those trees sequester right NOW. We can't wait 150 years.



4. Plus, why should the Town or its citizens bear the cost of replanting trees when Lightstar profits off of selling energy back to us for 25 years? If this project got approved, Lightstar should be required to plant 55,000 saplings contiguously within our Town when they leave.

The Lightstar rep mentioned paying into the tax base but on the calculation above, they would need to find 550 flat acres of contiguous land in the county to purchase to plant those trees, just to have the same effect. Surely, paying into the tax base on 550 acres would cost more than what they propose to pay into the tax base on a mere 26-69 acres?

The rep said Lightstar would issue a bond with the town and an agreement with the owner to decommission the array after 25 years but the board did not ask - how much the bond is for? Shouldn't it be enough to cover the costs above?

5. He said there would be no demands on services within the Town as opposed to OTHER projects that could go there. This is misleading, because our comprehensive plan literally warns about building anything on that parcel, so there is no relevance here.

6. The rep said there was no need for a solar farm moratorium because "the site had already been approved for a major road" and that there were no other factors of concern – that is also a misleading claim.

In 2010, the Hudson Valley Mall successfully sued the Town of Ulster for not obtaining proper Environmental Impact Statements before designating this potential road as a "transportation district." And THAT is the basis of our argument here: ENVIRONMENTAL IMPACTS.

Plus, in recommendation letters and in suggesting a solar moratorium, Ulster County's reasoning included:

- That there should be a 100ft. set back but the proposed project only calls for a 50ft. set back
- The proposed project at 26.3 acres, 6+ acres larger than the typically recommended max of 20 acres.
- Nowhere is "solar" mentioned in our Town's Comprehensive Plan
- Every town in the county EXCEPT for the Town of Ulster has a solar policy and updated zoning

7. The Lightstar rep mentioned that they would offer tons of discounts for cheaper energy as a benefit. That is an exaggeration. Currently Central Hudson customers can choose from a number of farms in the county for discounted rates or they can opt to install solar on their own roofs, but given the agrovoltaic movement to locate solar farms on farmland, coupled with the movement to take Central Hudson public, cheaper energy costs from other, better sited solar farms are already expected long-term.

Once again, I urge you to categorically reject this proposal and recommend that the Town of Ulster Town Board vote "no" on this project, based on my previous letter's concerns of misalignment with our Town's Comprehensive Plan and the misleading claims and explanations offered by Lightstar Renewables at the February 11th Town of Ulster Planning Board Meeting.

Sincerely,
Caylin Sanders
Town of Ulster Resident /
Esopus Creek Neighbors

cc: Town of Ulster Town Board