

May 22, 2025  
3641 Union Ridge Road  
Penrod, KY 42345

Case # 2024-00406  
Kentucky Siting Board  
211 Sower Blvd.  
Frankfort, KY 40602

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COMMISSION

To Whom it may Concern:

I am Roy Douglas Mallory residing near the proposed solar farm in SE Muhlenberg. I am concerned about misleading statements filed by Lost City Renewables LLC with the PSC.

**Visibility Study**

While only 17 residents from a 911 caller list were charted in Lost City's Visibility Analysis of 5/09/25, I was NOT one of the residents listed. I could easily view one of the proposed solar fields from my property before the leaves came out.

According to Lost City's explanation, "leaf-on conditions are assumed." With this parameter, the study would not be reliable for approximately six months of the year during leaf-off conditions.

Additionally, one would ask how the 2,000 ft radius was determined. Where is the center of this project that is not circular? Does the 2,000 ft radius mean the distance from the residence to the nearest solar panel, or the distance to the 6 ft fence with three strands of barbed wire marking the boundary of the solar farm? Yes, a 2,000 feet radius sounds good but what does it mean exactly? Is it something to placate both residents and the KY Siting Board?

Other questionable data inputs in the study include the heights of screens for Lost City's proposed plantings of 15 feet. Lost City reports this as a conservative estimate since these trees should mature from 15-80 feet in height. However, trees providing screen planted during construction of the project are expected to reach 15' for an 8-10 year growth period. In other words, during the first decade, the plantings will certainly fail to provide a 15' screen. As a result, the visibility study would not be reliable until 8-10 years later and that would be IF all trees and plantings survive and thrive.

It is no surprise that Lost City only charted 17 residents as having a view of less than 10% of the solar array. However, one would ask, 10% of what? 10% of the total acres in solar panels is quite large. But smaller numbers sound great. Were these numbers less than 10 charted to placate residents and please the KY Siting Board? This "new study" of visibility, the ArcGIS Spatial Analysis, commissioned by Lost City is a questionable tool for selling a 250 megawatt solar farm to the Penrod/Dunmor people. It should also be thoroughly reviewed if used to qualify for a construction permit.

Also included in this Visibility Study is the argument referenced to Richard Kirkland that solar panels should blend well in a rural setting. Mr. Kirkland contends that their height of 10 ft and their function to catch the sun's rays make solar projects comparable to greenhouses. Mr. Kirkland also claims that since greenhouses are accepted in rural settings, 10' tall solar arrays should also be accepted as part of the viewscape. This illogical comparison begins with the generally accepted premise that greenhouses are built in rural/residential areas and welcomed as part of the viewscape. However, the comparison fails in logic from there. Greenhouses do not cover 1,412 acres. Greenhouses are not composed of black silicon or plastic. Greenhouses do not replace acres and acres of native trees, grasses and crops. They do not destroy the natural beauty of the area as do 1,412 acres of solar panels. While greenhouses are welcome, huge solar farms are not.

### **Displaced Wildlife**

Another attempt to mislead is Lost City's claim that any results to displaced wildlife from the 1,412 acre project surrounded by a 6 ft fence with 3 rows of barbed wire at the top will be "MINIMAL."

According to the January 29, 2025 Application for Certification of Construction, Section 3M, Appendix M, Wildlife Concerns Analysis, "Any results on deer are expected to be temporary and for a short duration (less than a year)." Following this prediction, Lost City continues to advise landowners if they should have problems with displaced deer on their property how they can get legal permission to harvest the deer. Additionally, Lost City predicts that the project may disperse a few coyotes but there will be "No noticeable impacts." Without fact checkers for these claims, any adjoining resident who hears the coyotes at night or sees the deer gather in mass during the day, these arguments are unacceptable. Even the harvest numbers for deer in Muhlenberg County from KY Fish and Wildlife do not adequately represent the number of live white-tail deer on the property. Southeast Muhlenberg is one of those areas of the state where deer are more densely populated. Displacement will be detrimental to both deer and residents.

Respectfully,



Roy Douglas Mallory

