Case No. 2024-00406

Thank you for your comments on the application of Lost City Renewables LLC. Your comments in the above-referenced matter have been received and will be placed into the case file for the Commission's consideration. Please cite the case number in this matter, 2024-00406 in any further correspondence. The documents in this case are available at <u>View Case Filings for: 2024-00406 (ky.gov)</u>.

Thank you for your interest in this matter.

From: KY Public Service Commission Public Comments <psc.comment@ky.gov>
Sent: Saturday, March 15, 2025 10:34 PM
To: PSC Public Comment <PSC.Comment@ky.gov>
Subject: Public Comments for Case: 2024-00406 - Lost City Renewables LLC

Public Comments for Case 2024-00406 submitted by Saturday, March 15, 2025 at 10:34 PM

on

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Comments: Case #2024-00406 March 15, 2025 Dear Public Service Commission Board, I was greatly perturbed to hear of a proposed 1425 acre solar generating facility. This is due to multiple reasons, the first being the area's infrastructure. Forgy Mill Rd., one of the proposed access roads, is a small one-lane road that area residents rely on daily for travel. The road is just big enough for two cars to meet comfortably. When meeting a school bus, one must pull over to wait for it to safely pass. When receiving large shipments in the past, my family had to meet the semi truck delivering the shipment on a main road due to the semi not being able to safely navigate Forgy Mill. In places, the road is already washed out or riddled with potholes due to the elements. How will large equipment safely be able to navigate Forgy Mill Rd., as proposed by Lost City Renewables LLC.? How will area residents be able to navigate safely to their homes and farms with the influx of construction vehicles taking up already-limited road space? Forgy Mill is not the only road affected—Free Lane and Mason Poyner Road are also identified as roads that will be used. Free Lane is another one-lane road, and Mason Poyner is an incredibly small, curvy road—it would be impossible for two regular-sized vehicles to meet without one having to pull to the side. A regular-sized vehicle comfortably meeting a semi or large vehicle is not a possibility. On March 12, 2025, two large trucks met on the nearby Penrod Bridge, and the result was a shattered driver'sside glass on one of the trucks, with the driver possibly injured from the broken glass (source: Muhlenberg Watch). The Traffic Impact Study for Lost City Renewables LLC states an influx of 20-35 semis per day on the forementioned roads as well as 431, which would include additional traffic on the nearby Penrod Bridge. Additionally, the study states 300-400 workers may enter the site daily, traveling on 431, 949, Mason Poyner, Free Lane, and Forgy Mill. Given the width of key roads and the improbability of semis meeting on roads surrounding the area, one must wonder—is this safe? School buses utilize these roads daily, and one must ponder whether this added traffic will allow for travel to school that is safe and timely. And is it feasible to have this many semis and workers nearby without disturbing residents' ability to safely travel? Another concern is the lack of experience that Lost City Renewables LLC has in large scale solar projects. Several local community members became concerned of this lack of experience after an October 2024 community meeting where the project developer and environmental specialist were unable to answer the community's most basic questions (such as where they would access the project and what the environmental impacts may be). Upon further communication with the project developer after the meeting, the developer was unable to answer questions about past projects because there have been none completed by him. One of the developer's other proposed projects in Plantersville, SC, received severe pushback from residents concerned about the ecological, environmental, and health impacts—all concerns regarding the proposed Dunmor and Penrod project as well. Ecologically, the proposed site at Dunmor and Penrod boasts diverse wildlife. Endangered bats, deer, coyotes, and bald eagles call the area home. Upon reading through the environmental impact studies, I was disappointed to see what seems to be a lack of transparent numbers. The study seemingly relied on the harvest data to estimate how many deer would be impacted by the proposed project, but in reality, the number of deer within the 1425 acres is likely much higher. The environmental impact study cited a study from the Kentucky Department of Fish and Wildlife Resources, but they failed to include that "the population reconstruction model employed by KDFWR is extremely conservative." They also advised that "statewide and county information should be considered as a starting point," something it seems the

environmental impact study failed to do (source: 2023-2024 Kentucky White-Tailed Deer Harvest and Population Report from the Kentucky Department of Fish and Wildlife Resources). The environmental impact study also states the 1425 acres is only home to 1-2 coyotes—another inaccurate estimate, given that those in nearby areas hear and observe numbers much greater than this on a regular basis. In fact, the landowner of the proposed site formerly leased the acreage to hunters, publicly boasting of the diverse wildlife that could be found on the land (video available upon request). Deforestation would occur for this proposed project to become reality, with approximately 1000 acres of hardwood forest being cleared. This deforestation would undoubtedly drive the animals (such as deer and coyotes) living there from their current home to nearby farms and roadways. The Kentucky Department of Fish and Wildlife study also states that: "Overabundant deer populations may result in agricultural and landscape damage, be detrimental to forest health and regeneration, pose safety to deer-vehicle collisions, and serve as vectors for the transmission of diseases." Driving animals from their homes not only creates an issue for nearby farmers, but for the safety of drivers on many nearby roads. In fact, one study partially cited by Lost City Solar's website states, upon further investigation, that: "...blocking off 20 to 35 acres of land in the middle of an ecosystemespecially forestland—can be detrimental to wildlife." 1425 acres is a grave difference from 20-35 acres, so it stands to reason that as the number of acres blocked off rises, so does the detriment to wildlife (source: Lost City Solar's Frequently Asked Questions page that lists the "Making Solar Wildfire-Friendly" study). Of course, the loss of animal habitat is not the only concern when so much land is being deforested. Water runoff and contamination is a great concern for local residents as well. Water from this area eventually flows into the Green River, which is home to another set of diverse animals, including rare mussels. In 2023, two species of freshwater mussels formerly found in the Green River were declared extinct. The reason according to Fish & Wildlife is: "habitat loss and the introduction of invasive species and diseases by humans" (source: WBKO). On Lost City Solar's website, they cited parts of a study from Clean Energy Results. Upon closer inspection of the parts of this study not directly quoted by Lost City, it was written that: "Use of land for the purpose of solar photovoltaic power generation should be compatible with most other types of land usage. However, DOER strongly discourages designating locations that require significant tree cutting because of the important water management, cooling and climate tree benefits trees provide. DOER encourages designating locations in industrial and commercial districts, or on vacant, disturbed land" (source: Lost City Solar's Frequently Asked Questions page that lists the "Clean Energy Results" study). If the Department of Energy Resources believes that cutting so many trees will be detrimental, it makes sense to place solar generating facilities on barren land—the kind of land that the proposed site is not. Flooding is already a great concern in the Dunmor and Penrod region. Recent storms flooded fields and left water

standing over roadways, including many roadways surrounding and adjoining the proposed solar site (video footage and photos available upon request). Some of the land comprising the proposed solar site was also underwater. If these flooding issues are occurring at the project site now, where there are trees, undergrowth, and naturally occurring land elevation changes, what will happen when the trees are clearcut, hills graded, and topsoil removed? Water runoff mitigation is not something that area residents take lightly, especially given Western Kentucky's volatile weather patterns. The proposed site for this solar facility is also intrusive to the current landscape and to the surrounding area. Dunmor and Penrod are small, residential areas with many homes and farms adjoining or nearby the solar site. Many area residents have raised grave concerns about their property values and their mental and physical wellbeing if this project comes to fruition. Property owners being surrounded on three sides of their land by solar panels (with a staging area proposed extremely close as well) is unacceptable. Also unacceptable are substations 500 feet from residential homes. Area residents highly value the peaceful enjoyment of their property, something that would be lost both during construction and after construction, given reports and video footage that solar farms generate noise up to a half-mile away from the inverters, once operational. An additional concern raised by residents is the fire risk. Residential areas completely surround this proposed site—homes, fields, and farms make up Penrod and Dunmor. There is not yet sufficient data that displays the commonality and severity of solar facility fires, but solar farm fires are not a rare occurrence. Dunmor has a very small volunteer fire department—about six volunteers make up the team, with most having other fulltime careers. Dunmor and Penrod are not equipped with a fire department that is staffed to combat such a fire, should it occur. Additionally, putting out a solar fire takes special equipment and specific training-neither are had by the Dunmor Volunteer Fire Department. Lost City Solar's website quotes parts of a study from The Nature Conservancy titled "Making Solar Wildfire-Friendly: Creating solutions to maximize conservation benefit from solar production." Page two of the study lists six practices developed using the best available science. Those are: "1. Avoid areas of high native biodiversity and high-quality natural communities"—both things that Dunmor and Penrod offer. "2. Allow for wildlife connectivity, now and in the face of climate change. 3. Preferentially use disturbed or degraded lands"—which Dunmor and Penrod does not offer. "4. Protect water quality and avoid erosion"—the ability for this to happen is a major concern for residents. "5. Restore vegetation and grasslands. 6. Provide wildlife habitat" (source: Lost City Solar's Frequently Asked Questions page that lists the "Making Solar Wildfire-Friendly" study). While community members raised concerns throughout the October 2024 public meeting and after the meeting, these concerns have largely gone unnoticed and unanswered by the company. At the October 2024 public meeting, many questions were not sufficiently answered. The Lost City Renewables LLC

project manager promised a second community-wide meeting (video available upon request), but there has since been no communication from the company to adjoining or nearby landowners. Additionally, the environmental impact studies the project developer promised to provide were not available directly after the meeting as promised. Those impact studies came weeks later, showing that the project developer and environmental specialist themselves did not possess full knowledge of the project going into the public meeting. Interactions (or lack thereof) with this company and its staff have left many area residents concerned for the reputability and reliability of this company. At the October 2024 meeting, the project developer spoke of his desire to "be a good neighbor." Despite these words, serious concerns from residents have been ignored or diminished by Lost City Renewables LLC. The full 1000 foot setback from property boundaries might help diminish (though certainly not eliminate) impacts and protect the integrity of neighboring land, yet Lost City Renewables LLC. has moved forward with plans to build 150 feet from neighboring properties—not nearly enough of a buffer to provide noise relief to residents or to mitigate flood or fire risks. Lack of infrastructure, lack of roadway safety, ecological impacts, deforestation, flooding, water runoff, fire risk, property value reduction, and loss of peaceful enjoyment for nearby residents are just a few of the concerns many in the Dunmor and Penrod areas have raised over this proposed solar facility. Also troubling is a lack of transparency, knowledge, and honesty from the company when interacting with the community thus far. Discrepancies on the website, like differing figures and numbers on different pages, cast additional doubt. Additionally, Lost City Solar's own FAQ page on their website lists many studies that, upon deeper inspection, contains additional points that further verify that Dunmor and Penrod are not ideal for a project of this size. I strongly encourage the Public Service Commission to consider these concerns and to reject this foreign-based company's request to greatly impact a highly rural, residential area. Thank you for your time. Mara Cobb

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