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December 31, 2025

Town of Ancram Planning Board
1416 County Route 7
Ancram, NY 12502

RE: Comments on the Visual Impact Assessment for Ancram Solar

Dear Town of Ancram:

At your request, we reviewed the Visual Impact Assessment (VIA) for the proposed solar farm at 3333 State Route 82. You have asked us to evaluate the quality, accuracy and adequacy of materials found therein, as well as to provide an opinion regarding using those materials to assess the visual impacts of the proposed project. These are our findings.

Summary of Findings

The VIA understates the visual impact of the proposed action. We also have questions regarding the data and methods used to produce it. It is our opinion that these materials should not be used by the Town or the public to assess the visual impact of the proposed action.

The Visual Impact Assessment

The VIA is dated September 2025 and was produced by wendel. It briefly describes the proposed project, setting, and how the viewpoints for analysis were selected. It includes aerial imagery, photographs and simulations of those photographs, line-of-sight profiles and viewshed maps.

Photographs and simulations

Even though the VIA states the site was visited three times—and one of those visits was in March, when there would be no leaves on the trees—all photographs were taken during leaf-on conditions. When assessing visual impacts using photosimulation, the analysis should show reasonable-worst case visibility conditions, which typically means leaf-off, no snow conditions, with the leaf-off conditions being the primary concern. Simply, much of the screening deciduous trees provide will be gone during the winter months, and if the goal is to show reasonable worst-case conditions, then the photography needs to occur during leaf-off conditions.

Additionally, the applicant used a consumer grade camera to capture the photographs. While such equipment may be used for this type of work, care needs to be taken since the camera's sensor size is small, and a crop factor needs to be applied to convert the lens used into a 35mm equivalent. This information is necessary to communicate when the image is telephoto, wide-angle, or normal,

which is critical information to understanding the image. Typically, most photographs in VIAs will be captured using a normal, or 50mm lens using a full frame digital camera. In consumer grade cameras, however, a 50mm lens would be a telephoto image because the sensor size is smaller. The VIA has no detailed information on the image, like the time/date the image was taken. The lens used to take the image is described as "standard lens." We don't know what a standard lens is, nor is it described. Each image should include the date and time the photograph was taken and the 35mm lens equivalent used to capture the image. These are not trivial omissions, but since all the images should be retaken to reflect reasonable worst-case conditions, the applicant should be sure to include this information in any future submission.

Simulations

There appear to be serious problems with the simulations that go beyond the photography, but there is no discussion of the method used to produce these images, so it is impossible to state if they are simulations or if they are artist renderings that use photograph as media. The Town should require images that have a scientific basis and use a 3D model of an image rendered from the same location/time of day and lens used to take the photograph. This rendering is then merged with the existing conditions photograph to produce the simulation. At minimum, there must be a discussion on how the simulations were produced. The applicant may benefit from reviewing how such simulations should be produced.[1]

Line of sight profiles

The line-of-sight (LOS) profiles would benefit from additional data beyond a digital elevation model (DEM). If LiDAR data (discussed below) is available for this area, it would provide a more accurate basis for these profiles. We note that the representation of trees in the profiles is out of scale. It is acceptable to exaggerate vertical elements in a LOS profile, but the exaggeration should be noted as a part of the profile so the reader can understand the image.

Viewshed maps

The VIA states that the viewshed maps use a DEM from NYS GIS Clearinghouse with "the centroid of the proposed solar site designated as the observer feature." While not a major issue, viewsheds are not typically made using DEMs anymore. Rather, we now use a Digital Surface Model (DSM) as DSMs are now widely available from the United States Geological Survey (USGS) in the form of LiDAR[2] models. LiDAR captures not only the ground elevation but buildings and vegetation. We don't yet have 100% LiDAR coverage in New York State, but it is

[1] Our office published a primer on the production of photosimulations, which can be found online here. The National Park Service has published a much more exhaustive manual, which includes a primer on how to analyze simulations for decision-making, which can be found here. We are also happy to answer questions. These methods are not proprietary; they are standard industry practice.
[2] LiDAR is Light Detection And Ranging, which is a method for capturing large amounts of geographic data using pulsed laser light to measure distances to create precise 3D models.

getting close, and if DSM data exists for this area, it is better than a DEM for viewshed mapping.

Further, a single point located at the centroid of the panels is not sufficient to analyze visibility of a site with an area of disturbance of 9.45 acres. There should be many points representing the panels in the viewshed mapping. A single point would be used for something like a cell tower, not a solar farm. There are also no visual resources shown on the viewshed map. A VIA is often accompanied by an inventory of visual resources within the study area and are shown in a viewshed map. The NYS DEC provides instruction on identifying visual resources in Assessing and Mitigating Visual and Aesthetic Impacts. If there are any listed Visual Resources in the study area, they should be noted.

Finally, we would not characterize the zones of theoretical visibility as "minimal," as the VIA does. The maps in the VIA show a significant area with theoretical visibility. The text explaining the analysis needs to match with the output of the analysis.

Area for further consideration

Glare analysis

There is no glare analysis. Glare analysis is normally required when panels are proposed near airports or highways because panels can produce glare that can be dangerous in these environments. But glare can also disturb nearby residents. The Town may wish to see a glare analysis to assess the potential of glare on neighbors.

Close

We are attaching reproductions of two viewpoints and our comments on them. These are not exhaustive comments but rather they are representative of our comments on the materials in the VIA.

Again, it is our opinion the materials found in the VIA should not be used for your decision-making as they do not fully disclose the impact of the project.

Please contact us should you have questions or require further information.

Sincerely,

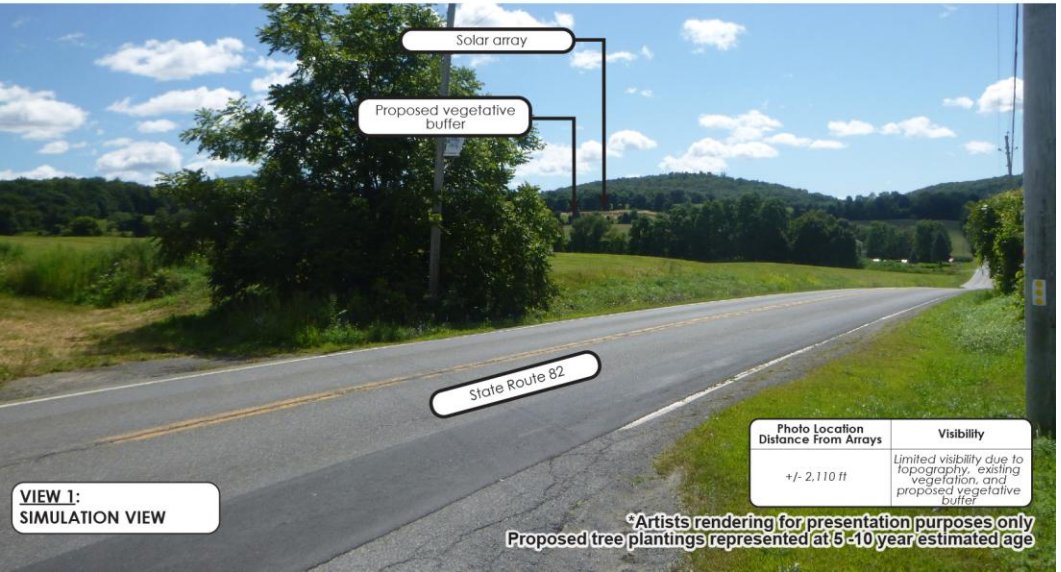
George M. Janes, AICP
George M. Janes & Associates

S. Alihan Polat
George M. Janes & Associates

Attachment: Comments on simulations and viewshed maps

Photosimulation – View 1

LINE OF SIGHT DIAGRAM:

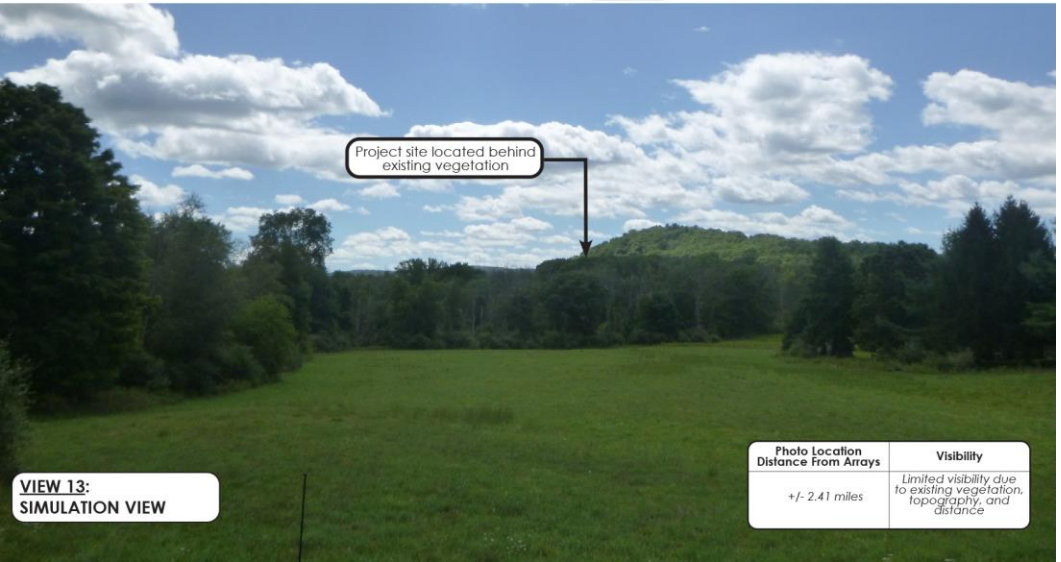


GMJ&A comments:

1. The existing conditions photograph is taken during leaf on conditions.
2. There is no meaningful information about the date/time of the photograph and the lens of the camera used
3. The tree in the foreground could have been avoided if the photograph would be taken from the other side of State Route 82 or a few feet down the State Route 82
4. There will be more visibility during leaf off conditions from the existing vegetation
5. The notation on the simulation interferes with the ability to understand and use the simulation to evaluate the change the project brings
6. There will be significantly more visibility if the photosimulation was done with no landscape mitigation or at the time of planting

Photosimulation – View 13

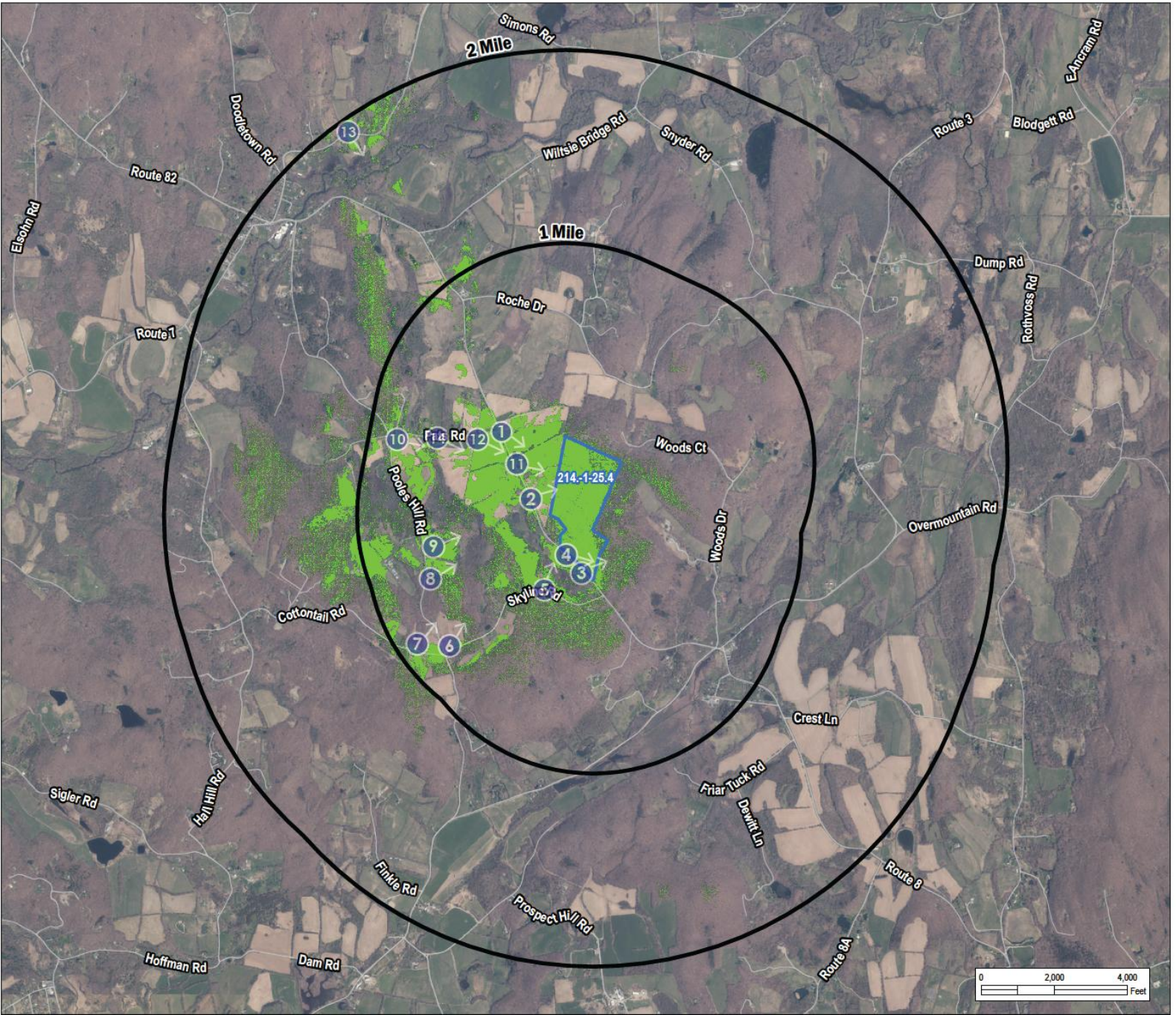
LINE OF SIGHT DIAGRAM:



GMJ&A comments:

1. The existing conditions photograph is taken during leaf on conditions
2. There is no meaningful information about the date/time of the photograph and the lens of the camera used
3. The photograph has high contrast / pure exposure, which is not ideal
4. Illustrative trees shown on LOS profile are not correctly scaled
5. LOS profile obscures part of existing conditions photograph making a direct comparison impossible
6. LOS profile suggests topography blocks the view, while the annotation states that existing vegetation limits visibility
7. Annotation on the image interferes with the understanding of the image. If an image needs to be explained, it can be explained with an additional image showing annotation

Viewshed



Ancram Solar
Viewshed Analysis- Project Parcel
3333 NY-82
Ancramdale, NY 12503
SBL: 214.-1-25.4

LEGEND
- Project Parcel Radii
- Project Parcel (SBL Labeled)
- Zone of Theoretical Visibility from Project Parcel

GMJ&A comments:

- Viewshed analysis shows visibility on wooded areas, which indicates the viewshed is only done with elevation features (DEM). DSM would have likely produced different results
- There are no visual resources shown on the viewshed map. The VIA does not describe if there are any within the map extent
- The viewshed color is not clearly distinct. The underlying aerial imagery and viewshed's green shades are not easy to distinguish
- 1- & 2-mile radius area seem to be based on the parcel not from area of disturbance

wendel
WPN 607153
Map Created: September 2025