

Ranger Power, since you were not able to attend the Cohoctah Township Planning Commission meeting of August 7, 2025, where your application was to be reviewed and discussed, and because you have not followed up on numerous items you promised to provide on July 29, 2025, (for example the 1,000 page glare study), the Planning Commission has put in writing questions they had for answer at our September 4, 2025 planning commission meeting, where your application will again be reviewed.

Question 1

Atwell Memo: Solar Array Runoff – Effects from Change in Land Use / Ground Cover

1. Can you provide a document from the LCDC that shows their concerns for the project area?
2. Does the LCDC agree with your proposed stormwater management approach?

Question 2

Atwell Memo: Solar Array Runoff - Water Quality Compliance via Impervious Disconnection

1. "A preliminary plan would summarize the specific criteria to be included in the final design to meet WQ compliance, based on guidelines set forth by one of the referenced state agencies. The preliminary plan will include a project map identifying areas of specific concern to the Drain Office (nearby residences or drains with substandard capacity), and areas where runoff should be analyzed during final design to mitigate potential increases (proposed parking, buildings, substation equipment areas, etc.). "
- Do we have this preliminary plan? If so, please direct us to it.
2. Is this memo stating that if we simply "disconnect" long rows of panels the land will not experience a problem with run-off?

Question 3

Glare Study

We are not able to open the link. We still are waiting for 15 flash drives and one paper copy of the glare study for our clerk.

Question 4

Emergency Response Plan. Please provide an amended plan to include all new proposed equipment and detailed response from EMS to Headland Solar's plans, if any exist.

Question 5

Fire Response

- 1) Is there an evacuation plan? If so, what is the radius?
- 2) How long does it take to shut off the power if there is a fire? Can we get a detailed timeline?
- 3) What kind of chemicals will be used? Will they be what the fire department needs to combat the fire?

Question 6

Stray Voltage Assessment: Is there one? If yes, please direct us to it.

Question 7

Noise. Sound mitigation. 271 homes within ½ mile of the project with only 2 participating parcels. Meaning, 269 non-participating parcels are affected. 20 of the 271 houses are within the 52 to 55db. What are the specific plans to be a good neighbor and reduce these sound levels? Will Headland commit to reducing the maximum sound level to 45db?

Question 8

Cultural Significance

Regarding the memorandum to Ms. Martha Macfarlane-Faes, Deputy State Historic Preservation Officer. It states that two cultural resources within or near the project's footprint were identified. Please identify the cultural resources, and locate on prints in regards to distance and proximity to the project proposed footprint or where this is located in your application.

Was there a response from the DSHP Office? Or was there any follow up attempted that's not listed within this application?

Question 9

In section 2: Solar Energy Facility Siting Certification Application, page 21 (of 50), subsection 6, Submit a Pre-construction Sound Monitoring Protocol in accordance with the guidance, it is stated in the summary that: "The nearest inverter to a non-participating residence is approximately 415 feet." Can you please:

1. Identify the property of the non-participating residence at 415 feet from an inverter?
2. Identify said property on the prints included in Exhibit A-1.1 06 through 23
3. Identify said property in Exhibit A-1.7: Sound Report and Modeling Protocol
 - a. Locate property and correlating Receptor Number

- b. Locate property by receptor number in Appendix B: Predicted Noise Levels in Graphs B-1 through B-8
 4. Identify said property by Receptor number in Appendix C: Predicted Noise Levels Contour
 - a. Including corresponding Print number regarding prints C-1 through C-6
Looking at Exhibit A-1.7: Sound Report and Modeling Protocol, while cross referencing the receptor locations, the predicted Noise Levels of Appendix B and the inverter distancing in Exhibit A-1.1 prints 06 through 23, I am confused at the following:
 1. Receptor # 459 is
 - a. 1011 feet from an inverter according to Exhibit 1-1.1print #07
 - b. 53 dB according to Exhibit A-1.7 Appendix B graph B-6
 2. Receptor #260 is
 - a. 992' from an inverter according to Exhibit 1-1.1 print # 09
 - b. 55 dB according to Exhibit A-1.7 Appendix B graph B-5
 3. Receptor # 77 is
 - a. 758 feet from an inverter according to Exhibit 1-1.1 print # 08
 - b. 55 dB according to Exhibit A 1.7 Appendix B graph B-2

In summary, the distance between receptors # 459 and #260 from an inverter is a difference of 19 feet resulting in a 3 dB difference between receptors # 459 and # 260. The distance between receptor #260 and # 77 from an inverter is a difference of 234 feet resulting in 0 difference of dB, between receptors # 260 and #77, both sitting exactly at 55db, which is the highest allowable dB at an outside wall of any non-participating residence required by Public Act 233.

My questions are:

1. Can you explain the discrepancy between the distancing of receptors from inverters and resulting dB inconsistencies.
2. How can you do a sound analysis without identifying the inverter brand?
3. Will Ranger Power commit to using inverters, similar to what you are doing in your Calhoun project as described by Toby?

Question 10

Removal of all buried cables, conduits, and foundations is required according to your application to restore the land during decommissioning. At Conway Township's meeting you indicated a property owner could agree to leave the cables, conduits, and foundations in the ground below three feet. You indicated to the Cohoctah Planning Commission, this would only occur if we're given leniency. Will you actually remove all cables, conduit, and foundations as stated in your application?

Question 11

Why has Ranger Power not looked at building a solar facility on Brownfields first?

Question 12

You stated at the July 29 special meeting that if this project causes flooding on nonparticipating property, you would take care of it. Where will this be stated in your application?

Question 13

At the July 29 Planning Commission Special Meeting you stated that Ranger Power is not in the business of buying property, to a question whether Ranger Power would buy a property at fair market value if it could not be sold. Does Ranger Power, Headland Solar, or any other entity it owns or has a controlling interest in, own any property in the Headland Solar development area or within one-half mile of the development?

Question 14

How can you return the land to its original condition during decommissioning if you have not done a soil analysis before construction? A soil analysis is required to do so.

Question 15

I have a concern regarding the insufficient detail provided in the Headland Solar permit application related to drainage and runoff management within the proposed industrial solar facility.

Reference: Section 30, Exhibit A-6.4, Stormwater Mitigation Plan

Reference: Drawing sheet 1 of 11, storm water run-off areas

Reference: Drawing Sheet 29, Crossings and Access Road Details

Reference: email from Headland Solar dated 08/08/25

Atwell memos

- o Solar Array Runoff - Effects from Change in Use/Ground Cover
- o Water Quality Compliance via Impervious Disconnection.

From the additional information provided by Atwell/Ranger Power, I understand that a correction factor is being applied based on soil composition and the planned pollinator plantings within the facility. However, key details remain unclear and prevent a full assessment of the site's impact on water flow and surrounding land.

To better assess the potential impact, I request clarification on the following:

Solar Panel Coverage

Could you please provide the approximate number of panels planned for the entire facility, and more specifically for the Cohoctah portion of the project?

· Each panel measures 2.55 m² (27.5 sq ft)

- I used a baseline of 1,500 panels per acre in preliminary calculations
- The Cohoctah section is referenced as having a capacity of 107 MW

Using those assumptions, I performed a basic calculation of the surface area covered by the proposed solar panel arrays. Based on recent data from WeatherUnderground.com, several one-inch+ rainfall events occurred in 2024:

- June 5 – 1.04"
- June 19 – 1.26"
- June 21 – 1.56"

A 1" rainfall event could potentially channel 4 million gallons or more from the solar panel surfaces alone in Cohoctah Township. Regardless of tilt direction, the panels will shed water similarly to gutters, leading to channelized flow throughout the facility. In addition, a comparable volume of runoff is expected from the Conway Township portion of the industrial solar facility. This water will enter the shared drainage system and ultimately contribute to the total stormwater runoff affecting Cohoctah, compounding the overall impact.

Access Roads

Using the provided specs:

- 27,123 linear feet x 20 feet wide x 8" depth of compacted 21-AA gravel
- Total surface area: approx. 542,460 sq ft

Even with partial absorption accounted for, my conservative calculations suggest that a 1" rainfall event could add another 300,000 gallons of runoff from these roads alone—due to their impervious nature compared to farmland or planted vegetation.

Formal Request for Documentation

Given these calculations, I find the drainage and water management sections of the current application to be incomplete. I am formally requesting that Ranger Power provide the following:

1. A detailed runoff calculation assessing water volume from 1", 1.5", and 2" rainfall events, must include the total water volume estimates for both townships.
2. A site plan or engineering drawing clearly showing the locations and capacities in gallons of retention ponds, drainage infrastructure, or other measures intended to manage stormwater runoff from solar panel arrays and access roads.

Thank you for your attention to these critical issues. I look forward to a prompt and thorough response, including documentation that fully addresses these concerns and clarifies how stormwater will be effectively managed across the project site.

Question 16

I am writing to express concern regarding the incomplete information provided about the potential presence of Blanding's Turtle habitat within the proposed solar array area in Cohoctah Township.

Reference Section 28, Exhibit A-6.2: Environmental Compliance Report

Blanding's Turtles are listed as a Species of Special Concern by the Michigan Department of Natural Resources (MDNR). Although not currently listed as endangered, they are under increasing threat, and their populations continue to decline. In fact, the U.S. Fish and Wildlife Service is expected to make a determination in 2025 on whether to add the Blanding's Turtle to the federal endangered species list.

Livingston County is a significant location for this species, with 27 documented occurrences as of 2024, making it the third highest county in the entire state of Michigan. Notably, the oldest known Blanding's Turtle in Michigan—recorded at 90 years old (3R11L)—was found in Livingston County, Pinckney Area.

Given these facts, I find the information in the Headland Solar permit application to be insufficient in addressing whether the proposed development area includes suitable habitat for the Blanding's Turtle. Furthermore, if such habitat is present—which I believe to be the case—there appears to be no risk mitigation plan included in the application.

I am formally requesting that Ranger Power provide the following:

1. A comprehensive assessment—conducted by a qualified biologist or ecologist—confirming whether or not Blanding's Turtle habitat exists within the proposed project area.
2. If such habitat is confirmed, a clear and detailed risk mitigation plan outlining how potential impacts to the species and its habitat will be avoided or minimized during and after construction.

Thank you for your attention to this matter. I look forward to a response and updated documentation from Ranger Power addressing these concerns.

<https://mnfi.anr.msu.edu/species/description/11490>

<https://mnfi.anr.msu.edu/species/description/11490/Emydoidea-blandingii>

<https://www.whmi.com/news/article/blandings-turtle-u-of-m-edwin-george-reserve-pinckney>

Question 17

Groundwater analysis. Application does not appear to contain groundwater analysis. Headland Response: The Project will not complete a groundwater analysis as this requirement exceeds the requirements as defined by PA 233.

Question: How does this requirement exceed PA 233, in light of Section 223(3)(a), which states in part that “[a]n affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance”?

Question 18

Security plan. Application does not appear to include a formal security plan.

Headland Response: The Project will not complete a security plan as this requirement exceeds the requirements as defined by PA 233.

Question: How does this requirement exceed PA 233 “[a]n affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance”??

Question 19

Statistical Data. Site plan does not appear to include the following required information: total number of structures, total number of units, total square feet, total gross and usable floor area, total carports or garages, employees by shift, the percent of area being developed, the percent of area used for structures, the percent of area left undeveloped. Site Plan does not appear to include the name of the public school district serving the site. Headland Response: The Site Plan submitted to the Township includes all required information and requirements as defined by PA 233.

Question: This information is still required. “An affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance.” Section 223(3)(a).

Question 20

Contour Intervals. Site plan does not reflect two-foot intervals, referenced to USGS datum. Headland Response: A site plan was prepared for the Project using the latest edition of USGS maps, GIS mapping, and preliminary ALTA surveys and includes all required information and requirements as defined by PA 233.

Question: This information is still required. “An affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance.” Section 223(3)(a).

Question 21

Registered Designs Application does not appear to contain signatures and/or seals for drawings, engineering estimates and special cost estimates. Headland Response The

Site Plan submitted to the Township is preliminary, and therefore, not certified. Details on engineering estimates and special cost estimates are outside of the Project's application requirements as defined by PA 233.

Question: This information is still required. "An affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance." Section 223(3)(a).

Question 22

Decommissioning and land reclamation. The decommissioning plan and proposed decommissioning agreement do not appear to provide evidence of proposed commitments with property owners. Headland Response Details regarding proposed commitments with property owners are confidential. The Project's proposed Decommission Plan is provided in Exhibit A-13.1 of the application and sufficiently addressed the decommissioning requirements as defined by PA 233.

Question: This information is still required. "An affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance." Section 223(3)(a).

Question 23

Indemnification. Application does not appear to include required attestations of indemnification. Headland Response This exceeds the requirements as defined by PA 233 and will not be provided.

Question: How does this exceed PA 233. This information is still required. "An affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance." Section 223(3)(a).

Question 24

Manufacturer's directions or instructional manual. Application does not appear to include these materials. Headland Response This exceeds the requirements as defined by PA 233 and will not be provided.

Question: How does this requirement exceed PA 233. This information is still required. "An affected local unit may require other information necessary to determine compliance with the compatible renewable energy ordinance." Section 223(3)(a).

Question 25

Construction hours do not comply with Township Solar Ordinance. Provide documentation for compliance.

Question 26

Provide where in the application the wildlife corridors for every fenced area?

Question 27

What discussions have you had with DTE on siting a connection to the grid? What discussions have you had with MISO on siting a connection to the grid. Are you able to share with us your application and all correspondence?

Question 28

ITC is proposing a switching station in our overlay district on Gannon Road, between Fleming and Antcliff. What would this do to your proposed interconnection location?

Question 29

Does Ranger Power have any information, or been in contact with ITC on the route the new power lines will take to connect to the new switching station? What would this do to your proposed project?

Question 30

How will Headland Solar protect the eagles in the project area?

Question 31

Noise pollution is a major concern, especially for those nonparticipating parcels. Your sound analysis shows 202 parcels with decibel levels of 46 to 55 decibels. We hear often that the industry wants to work with communities. Reducing the decibel levels for nonparticipating parcels and improving the visual impact would go a long way in establishing a good neighbor relationship. Is there any way that Headland Solar could achieve sound mitigation by establishing an open-air sound barrier using acoustic absorbing sound panels around the inverters and power generating equipment? The same for better screening options to reduce the visual impact? As I understand from our Supervisor, Headland Solar has stated they are not willing to do any sort of mitigation because PA 233 says you can. I would hope that you could do better to be a good neighbor in our community.

Question 32

Exhibit A-1.6 Changes. Maps do not clearly show precise locations of proposed changes. Please provide location for each change.

Question 33

Several of the proposed changes contain language like "The Application may consider the option of removing the section of panels, as shown below, for construction feasibility." This depends, as is explained in the change, if the project can achieve its target energy capacity. See changes, 2-7. So, do you know if this change is currently necessary? When would you know? Is this proposed change premature?

Question 34

Change 8 speaks of discussions with various parties, which included representatives from a solar energy project that is proposed in close proximity to Headland Solar. What was the discussion about and with what various parties? We know that DTE is one of these parties. What was the decision made with these discussions? Where will the interconnection point for this application? What project is proposed in close proximity to Headland Solar?

Question 35

Changes 9-12 states that many changes require confirmation of the regulatory status of wetland from EGLE for those wetlands not regulated by EGLE will be minimized to the extent practicable? What exactly are you saying here? Have you taken into account Cohoctah Townships regulations for non-regulated wetlands?

Question 36

Fire Safety: At the Conway Township meeting you indicated that you would be installing at your own cost an 8-inch hydrant along Owosso Rd.

1. Is this correct?
2. How close will this be to your proposed building in the development?
3. Will your proposed project meet or exceed the standards in 855 of the NFPA?
4. Will the fire safety standards provide 24/7 monitoring of the proposed project either on-site or remote?
5. Will the project provide access to both Howell and Fowlerville Fire Departments to allow depowering of the facility or specified sections, to allow fire fighters to fight any fires or other emergencies?

Question 37

As you are aware, sound is a big problem for nonparticipating property owners. Although PA 233 sets a standard of 55 dB at the outer wall of a house, DTE in Iosco

Township is proposing a standard of 45 dB at the fence line. Would Ranger Power, in the interest of being a good neighbor, be willing to provide a sound level of 45 dB at the outer wall of a nonparticipating house? What are you willing to do so that the 202 parcels above 45 dBs are not impacted with health issues?

Question 38

Complaint process: Provide procedures for regular reporting of each complaint, and how each complaint was resolved to either the township or the MPSC?

Question 39

Environmental Questions: Based upon the MPSC response of August 1, 2025 to the Acceleration Solar application being incomplete, # 27-35, please update your application to provide the information listed as missing by the MPSC in writing to the planning commission.

Question 40

No project labor agreements are provided. Please provide.

Question 41

Your application fails to provide soil analysis so that when the land is decommissioned it can be restored. Please provide a current soil analysis.

Question 42

There is no mention on the manner of the financial guarantee for decommissioning. Please provide.

Question 43

Given the lack of information in your application to both townships, see our letters of May 30, 2025 incompleteness of the application, and based on the incompleteness of your Acceleration Solar Application to the MPSC and the missing information in that application, and further, that to submit an application to the MPSC that is different than the application you submitted to us for review, would be patently unfair and unethical, would Ranger Power be willing to withdraw their application and then resubmit when you have the required completed application and information? Are you willing to extend the date for a final decision to December 5, 2025?