



Headland Solar, LLC
320 N Sangamon St. #1025
Chicago, IL 60607

September 3, 2025

Cohoctah Township
Attn: Planning Commission Chair Buttermore,
10518 Antcliff Rd.
Fowlerville, MI 48836

Re: List of Requested Questions from Cohoctah TWP Planning Commission

Planning Commission Chair Buttermore,

In response to your letter sent on August 28, 2025 via email, related to the Planning Commission's questions offered during the August 19, 2025, meeting, we offer the response below.

Sincerely,

Headland Solar, LLC



Cohoctah Township Question 1	<p>Solar Array Runoff</p> <ol style="list-style-type: none"> 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?
Headland Response	Refer to Summary of Agency Consultation in Exhibit A-4.4 for summary of coordination with LCDC.

Cohoctah Township Question 2	<p>Solar Array Runoff</p> <ol style="list-style-type: none"> 1. 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?
Headland Response	Refer to the Minimize, Mitigate, and Repair Plan in Exhibit A-1.3 for a summary of measures implemented to minimize / avoid stormwater impacts. Additionally, this plan describes Headland Solar’s plan for mitigation in the event of damage during construction

Cohoctah Township Question 3	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.
Headland Response	15 flash drives of the glare study have been sent to the Township.

Cohoctah Township 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.
Headland Response	<p>All information regarding the Emergency Response Plan required of PA 233 at this time is listed in the application, Exhibit A-1.9.</p> <p>Please also refer to the Summary of Agency Consultations in Exhibit A-4.4.</p>



Cohoctah Township Question 5	<p>Fire Response</p> <ol style="list-style-type: none"> 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?
Headland Response	<p>All information regarding the Fire Response Plan required of PA 233 at this time is listed in the application, EXHIBIT A-1.9 – Emergency Response Plan and Exhibit A-1.10 - Fire Response Plan</p> <p>A detailed timeline regarding power shutoff is not available at this time.</p>
Cohoctah Township Question 6	<p>Stray Voltage Assessment: Is there one? If yes, please direct us to it.</p>
Headland Response	<p>The project will not complete a stray voltage assessment as this requirement exceeds the requirements as defined by PA-233.</p>
Cohoctah Township Question 7	<p>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?</p>
Headland Response	<p>Headland will not exceed 55 decibels (average hourly) at the nearest wall of nonparticipating properties, in accordance with MCL 460.1226(8)(a)(iv) noise limits.</p>
Cohoctah Township Question 8	<p>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.</p> <p>Was there a response from the DSHP Office? Or was there any follow up attempted that’s not listed within this application?</p>
Headland Response	<p>Please clarify what exactly is being requested.</p> <p>The extent of the available correspondence with DSHP Office is included in the application.</p>



Cohoctah Township Question 9	<p>My questions are:</p> <ol style="list-style-type: none"> 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?
Headland Response	<p>Please clarify what discrepancies you are referring to. Refer to Exhibit A-1.7 - Executive Summary Final inverter selection has not yet been determined.</p>

Cohoctah Township Question 10	<p>Will you actually remove all cables, conduit, and foundations as stated in your application?</p>
Headland Response	<p>The project will comply with all required decommissioning obligations.</p>

Cohoctah Township Question 11	<p>Why has Ranger Power not looked at building a solar facility on Brownfields first?</p>
Headland Response	<p>Please refer to Exhibit A-1.5 – Alternatives.</p>

Cohoctah Township Question 12	<p>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?</p>
Headland Response	<p>A Complaint Resolution Process for the site has been established and is detailed in Exhibit A-1.16</p>

Cohoctah Township Question 13	<p>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?</p>
Headland Response	<p>Please clarify what this request pertains to as it related to Headland’s application.</p>



Cohoctah Township 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.
Headland Response	The site restoration section details steps to return the land to a state similar to its pre-construction condition, following PA 116 requirements.

Cohoctah Township Question 15	<p>Could you please provide the approximate number of panels planned for the entire facility, and more specifically for the Cohoctah portion of the project?</p> <p>I am formally requesting that Ranger Power provide the following:</p> <ol style="list-style-type: none"> 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. <p>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.</p>
Headland Response	<p>There are approximately 500,015 PV modules included in the Project’s site plan, of which approximately 230,000 (46%) are in Cohoctah Township.</p> <p>Detailed stormwater calculations have not yet been prepared for the Project, given its preliminary nature.</p>

Cohoctah Township Question 16	<p>I am formally requesting that Ranger Power provide the following:</p> <ol style="list-style-type: none"> 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.
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	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.
Headland Response	Please refer to Exhibit A-6.2 – Environmental Compliance Report.

Cohoctah Township Question 17	Groundwater analysis. 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”?
Headland Response	A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).



Cohoctah Township Question 18	Security Plan. 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”?
Headland Response	A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).



Cohoctah Township Question 19	Statistical Data. 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”?
Headland Response	A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).



Cohoctah Township Question 20	Contour Intervals. 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”?
Headland Response	A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).



Cohoctah Township Question 21	Registered Designs Application. 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”?
Headland Response	A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).



Cohoctah Township Question 22	Decommissioning and land reclamation. 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”?
Headland Response	A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).



Cohoctah Township Question 23	<p>Indemnification.</p> <p>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”?</p>
Headland Response	<p>A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).</p>



Cohoctah Township Question 24	<p>Manufacturer’s Direction or instructional manual.</p> <p>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”?</p>
Headland Response	<p>A compatible renewable energy ordinance “means an ordinance . . . , the requirements of which are no more restrictive than the provisions included in section 226(8).” MCL 460.1221(f) (defining compatible renewable energy ordinance). Section 226(8)(a) contains limited requirements for setbacks, fencing requirements under the National Electric Code, solar panel height, sound, and dark-sky friendly lighting solutions. MCL 460.1226(8)(a). An ordinance requiring items more restrictive than those contained in Section 226(8) is not a compatible renewable energy ordinance. This request for information is neither helpful nor necessary to determining compliance with the requirements set forth in Section 226(8). The Application is fully compliant with Section 226(8). An energy facility that is compliant with Section 226(8) “does not present an unreasonable threat to public health or safety.” MCL 460.1226(7)(g).</p>
Cohoctah Township Question 25	<p>Construction hours do not comply with Township Solar Ordinance. Provide documentation for compliance.</p>
Headland Response	<p>This request exceeds the requirements as defined by PA-233.</p>
Cohoctah Township Question 26	<p>Provide where in the application the wildlife corridors for every fenced area?</p>
Headland Response	<p>This request exceeds the requirements as defined by PA-233.</p>



Cohoctah Township 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?
Headland Response	Headland Solar established Queue Position J2139 in the MISO Interconnection Queue in July 2021 and is in the DPP-2021-East-ITC study Cluster. The Project will interconnect to the MISO transmission system at the METC-owned 345 kV Blackfoot-Madrid Line, the Point of Interconnection (“POI”).
Cohoctah Township Question 28	ITC is proposing a switching station in our overlay district on Gannon Road, between Fleming and Antcliff. What would this do you your proposed interconnection location?
Headland Response	This request exceeds the requirements as defined by PA-233 and is irrelevant to the Township’s evaluation of Headland’s application.
Cohoctah Township 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?
Headland Response	This request exceeds the requirements as defined by PA-233 and is irrelevant to the Township’s evaluation of Headland’s application.
Cohoctah Township Question 30	How will Headland Solar protect the eagles in the project area?
Headland Response	Please refer to Exhibit A-6.2 – Environmental Compliance Report.



Cohoctah Township Question 31	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.
Headland Response	Headland will not exceed 55 decibels (average hourly) at the nearest wall of nonparticipating properties, in accordance with MCL 460.1226(8)(a)(iv) noise limits.
Cohoctah Township Question 32	Exhibit A-1.6 Changes. Maps do not clearly show precise locations of proposed changes. Please provide location for each change.
Headland Response	The map and description of known potential modifications or variations in the proposed Site Plan that are being considered in EXHIBIT A-1.6 are in compliance with PA-233.
Cohoctah Township Question 33	See changes, 2-7. So, do you know if this change is currently necessary? When would you know? Is this proposed change premature?
Headland Response	Changes will be finalized prior to the commencement of construction.
Cohoctah Township Question 34	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?
Headland Response	Please refer to Exhibit A-1.6, 8.0 for details regarding potential changes to the Project's point of interconnection.



Cohoctah Township 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?
Headland Response	Further coordination with EGLE is required to determine the regulatory status of wetlands throughout the Project area, which may impact the current site plan.

Cohoctah Township Question 36	<p>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.</p> <ol style="list-style-type: none"> 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?
Headland Response	<ol style="list-style-type: none"> 1. Yes 2-5. Further details regarding the Project's proposal to install a hydrant have not yet been determined, as this will require additional coordination with each respective fire department prior to the commencement of construction.

Cohoctah Township Question 37	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?
Headland Response	Headland will not exceed 55 decibels (average hourly) at the nearest wall of nonparticipating properties, in accordance with MCL 460.1226(8)(a)(iv) noise limits.



Cohoctah Township 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?
Headland Response	Please refer to Exhibit A-1.16 – Complaint Resolution Process .

Cohoctah Township 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.
Headland Response	Please clarify what question or information is being requested.

Cohoctah Township Question 40	No project labor agreements are provided. Please provide.
Headland Response	Headland Solar will enter into a Project Labor Agreement with one or more labor organizations prior to the commencement of construction. Headland Solar will provide a copy of the Project Labor Agreement once it is finalized.

Cohoctah Township 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.
Headland Response	Refer to the Soil and Economic Survey Report available in Exhibit A-6.1 .

Cohoctah Township Question 42	There is no mention on the manner of the financial guarantee for decommissioning. Please provide.
Headland Response	Please refer to Exhibit A-13.2 through A-13.3 .

Cohoctah Township Question 43	Are you willing to extend the date for a final decision to December 5, 2025?
Headland Response	The mutually agreed-upon final decision date is September 18, 2025. No further extensions will be offered or entertained by Headland.