

The logo for SWCA is positioned on the left side of the page. It consists of the letters 'S', 'W', 'C', and 'A' stacked vertically in a large, light blue, serif font. The 'S' and 'W' are partially cut off by the left edge of the page.

Rouget Road Solar Farm

Exhibit A-1.2 Area Land Use Information MPSC
Requirements

Lenawee County, Michigan

SEPTEMBER 2026

PREPARED FOR

Rouget Road Solar Farm, LLC
353 N Clark St.
30th Floor
Chicago, IL 60654

PREPARED BY

SWCA Environmental Consultants
200 W 22nd St.
Suite 220
Lombard, IL 60148

EXHIBIT A-1.2 – AREA LAND USE INFORMATION

A-1.2.(a) – Exhibit A-1.2 maps must show, at a minimum, the following information within the proposed facility (including all components and ancillary feature(s)) and within 1,000 feet of the proposed facility (including all components and ancillary feature(s)). The applicant should ensure that all items provided are clear and legible which could entail providing some of the requested items on separate layers, separate portable document format (pdf) maps, or by showing some areas on another scale.

The area land use maps for the proposed Rouget Road Solar Farm Project (“Project”) include all required details within and surrounding the leased parcel boundary up to 1,000 feet (for the purposes of the following responses, the “Project Area”), including all components and ancillary features. Specific items have been provided on separate layers, individual PDF maps, different base maps, or at different scales as necessary to ensure clarity and legibility. The area land use maps were created using the latest edition of USGS maps and GIS mapping.

1. Municipal boundaries and taxing jurisdictions, at a scale sufficient to determine and demonstrate relation of facilities to those geographic and political features

Figure 1, Municipal Boundaries Map, and Figure 2, Site Location Map, in **Appendix II Exhibit A-1.2** illustrate, in relation to the Project Area, at sufficient scale: (i) the municipal boundaries, including township, county, and city boundaries; (ii) U.S. Geological Survey topographic quadrangle boundaries; and (iii) taxing jurisdictions (the Project is entirely within Palmyra Township).

2. Proposed land uses within the facility and surrounding area including, but not limited to, the identification of land being utilized for agriculture including the cultivation of specialty crops according to publicly available data.

The review for proposed land uses did not identify any publicly known proposed uses for the land on which the Project is sited. A review of the National Land Cover Database, confirmed by field surveys, determined that most of the Project Area currently consists of agricultural land. No specialty crops were identified within the Project Area or within 1,000 feet. Refer to Figure 3, Existing Land Use Map, and Figure 4, USDA Cropland Data, in **Appendix II Exhibit A-1.2**.

3. Farmland, including, but not limited to, prime farmland within the facility and surrounding area within 1000 feet of the perimeter.

Figure 5, Prime Farmland Map, in **Appendix II Exhibit A-1.2** illustrates the farmlands within the Project Area including the 1,000-foot buffer.

4. Existing overhead and underground major facilities for electric, gas, and telecommunications transmission.

Figure 6, Existing Utilities Map, in **Appendix II Exhibit A-1.2** illustrates overhead and underground existing utility lines within the Project Area.

5. A map of all properties upon which any component of a facility or ancillary feature would be located must show the current land use, tax parcel number and owner of record of each property, and any publicly known proposed land use plans for any of these properties. Also, identify any parcels within the project boundaries participating in farmland development rights agreements under Michigan’s Farmland and Open Space Preservation Program (PA 116).

Figure 3, Existing Land Use Map, in **Appendix II Exhibit A-1.2**, is a series of maps illustrating the current land use. Figure 7, Parcels Map Series, in **Appendix II Exhibit A-1.2** is a series of maps that illustrate the current zoning, tax parcel number, and owner of record of each participating property that will host Project facilities in the Project Area. The Figure 7 maps also reflect parcels within the Project participating in farmland development rights agreements under Michigan's Farmland and Open Space Preservation Program (PA 116). The Applicant is not aware of any known proposed land use plans for the area other than the proposed Project.

- i. **For wind facilities, all properties within 2,000 feet of such facilities must be shown.**

This Project is not a wind facility and therefore Exhibit A-1.2.(a).5.i is not applicable.

6. Existing local zoning districts.

Figure 7, Parcels Map Series, in **Appendix II Exhibit A-1.2** is a series of maps that illustrate the participating parcels that host Project facilities in the Project Area as well as the local zoning districts.

7. Designated coastal areas, inland waterways, groundwater management zones, designated agricultural districts, flood-prone areas, and coastal erosion hazard areas.

Figure 8, Flood Hazard and Wellhead Protection Map, in **Appendix II Exhibit A-1.2** illustrates flood zones and wellhead protection areas within the Project Area. According to the Palmyra Township website zoning map, there are no designated agricultural districts in the Project area. As noted on Figure 8, there are no designated coastal areas, inland waterways, groundwater management zones, or coastal erosion hazard areas within the Project Boundary or within 1,000 feet.

8. Recreational and other land uses that might be affected by the sight or sound of the construction or operation of the facility, interconnections and related facilities. Identify any wild, scenic, and recreational river corridors, open spaces, known archaeological, geologic, historical, or scenic areas, parks, designated wilderness, forest lands, scenic vistas, conservation easement lands, federal or state designated scenic byways, nature preserves, designated trails, public-access fishing areas, major communication and utility uses and infrastructure, and institutional, community, and municipal uses and facilities.

Figure 9, Water Resources Map, and Figure 3, Existing Land Use Map, in **Appendix II Exhibit A-1.2** illustrate land uses that might be affected by the sight or sound of the construction or operation of the facility, interconnections, and related facilities. Field review did not show any affected areas that have current recreational uses other than perhaps private uses (e.g. private trails, private hunting uses). No other land uses within the 1,000 buffer are anticipated to be impacted.

As noted on Figure 1, Municipal Boundaries Map, in **Appendix II Exhibit A-1.2**, within the Project Area, there are no known:

- Wild, scenic, or recreational river corridors;
- Open Spaces;
- Geological, historical, or scenic areas;
- Parks;

- Designated wilderness, forest lands, or scenic vistas;
- Federal or state designated scenic byways;
- Nature preserves;
- Designated trails;
- Public-access fishing areas;
- Major communication or utility uses or infrastructure;
- Institutional, community, or municipal uses or facilities.

As noted on Figure 7, Parcel, Zoning, and PA116 Map, in **Appendix II Exhibit A-1.2**, there is an existing Conservation Reserve Program easement on parcel PA0-120-2800-00. The Applicant is currently coordinating with the U.S. Department of Agriculture regarding the easement.

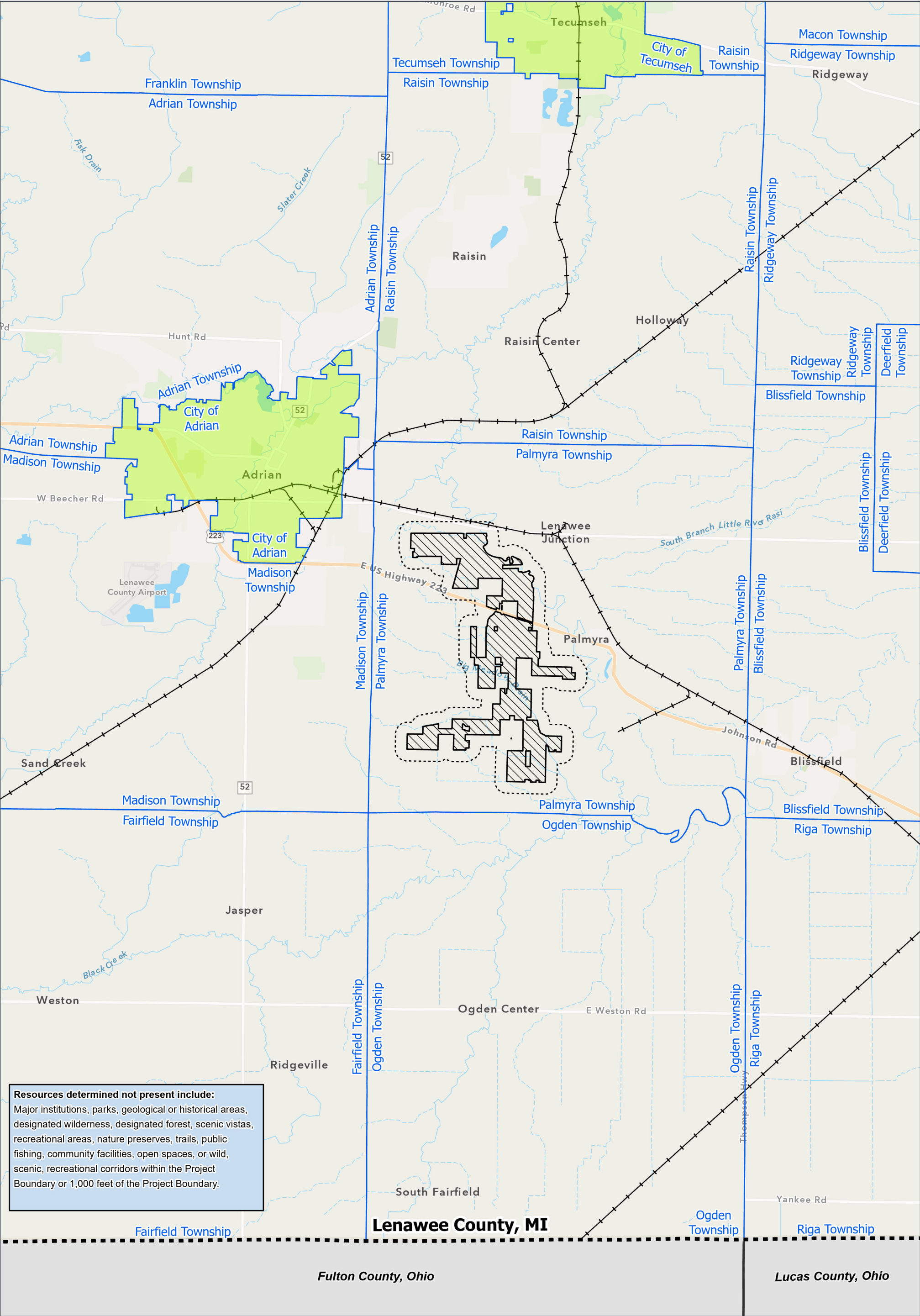
- 9. Depict the proposed facilities, adjacent properties, all structures within participating and adjacent properties, property lines, and the projected sound isolines along with the modeled sound isolines including the statutory limit and any limits that have been adopted in administrative rules by the MPSC (not applicable at this time).**

Figure 7, Parcel, Zoning, and PA116 Map, in **Appendix II Exhibit A-1.2** illustrates the proposed facilities, adjacent properties, all structures within participating and adjacent properties and property lines. The Sound Report included as Appendix A-1.7 provides the sound isolines.

- 10. Depict the area that will be impacted by shadow flicker for wind facilities, including isolines indicating areas expected to experience 30 hours or more per year of shadow flicker and locations of occupied structures.**

This Project is not a wind facility and therefore Exhibit A-1.2.(a).10 is not applicable.

For more information regarding the Area Land Use Information, see also **Appendix I, Exhibit 2**, Direct Testimony of Carol Mcknight (“C. Mcknight”), at pp. 5-7.



Resources determined not present include:
Major institutions, parks, geological or historical areas, designated wilderness, designated forest, scenic vistas, recreational areas, nature preserves, trails, public fishing, community facilities, open spaces, or wild, scenic, recreational corridors within the Project Boundary or 1,000 feet of the Project Boundary.

ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 1
Municipal
Boundaries Map

- 1,000-foot Buffer
- Leased Area / Project Boundary (~2,133 acres)
- Railroad
- City Limits
- Minor Civil Division
- County Boundary

Palmyra Twp,
Lenawee County, MI

NAD 1983 UTM Zone 17N
41.8541°N 83.9755°W

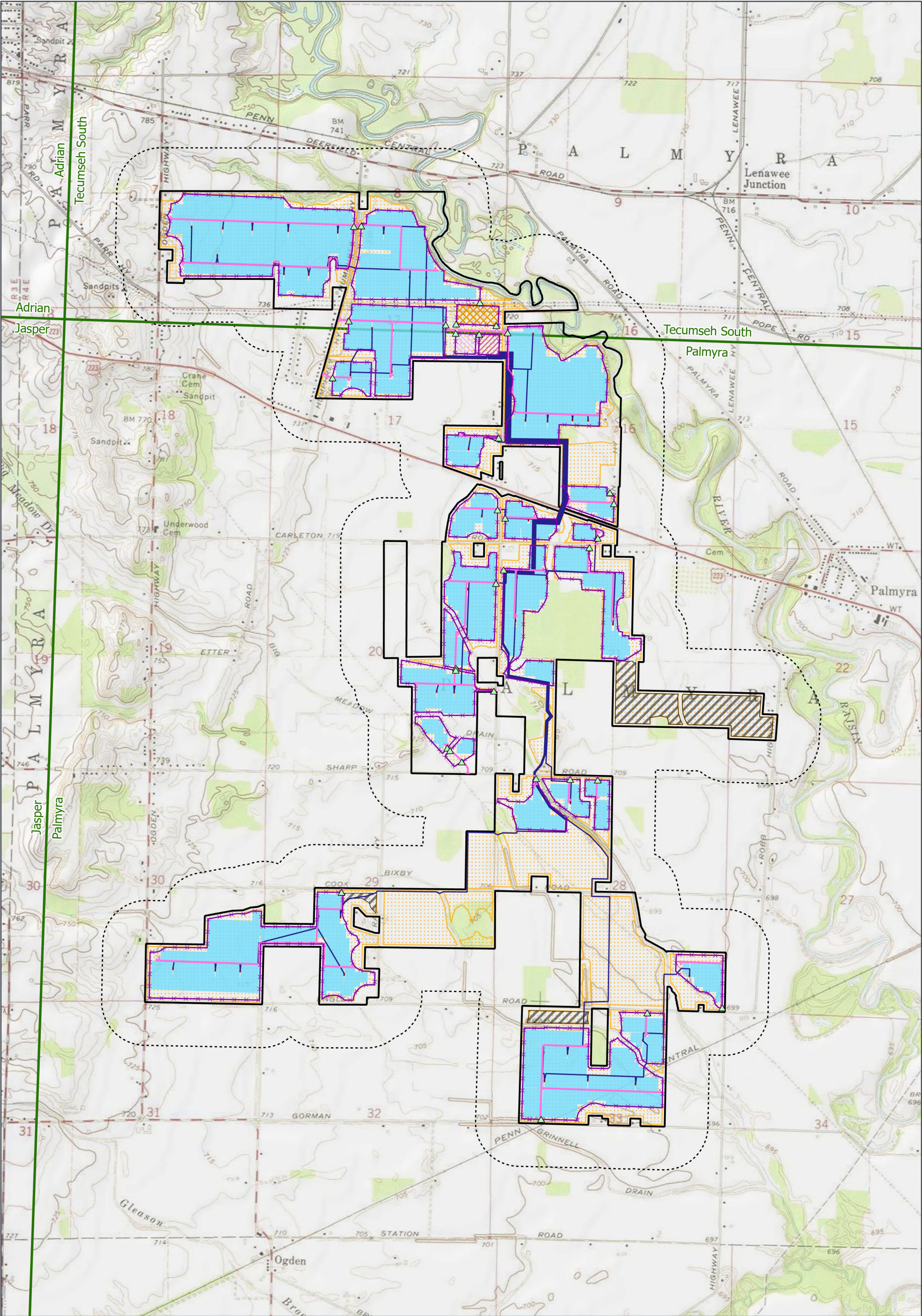
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accessed August 2025
Updated: 8/21/2025
Project No. 78878
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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 2
Site Location Map
USGS 1:24000

- Proposed Layout**

 - Gate
 - Fence
 - Access Road
 - Underground Cable
- Inverter
 - Solar Panel
 - Laydown Area
 - O&M Pad
 - Substation Pad
 - Switchyard Pad
- Site Plan Boundary (~1,606 acres)
 - Leased Area / Project Boundary (~2,133 acres)
 - 1,000-foot Buffer
 - 7.5-Minute Quadrangle Boundary

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8546°N 83.9658°W

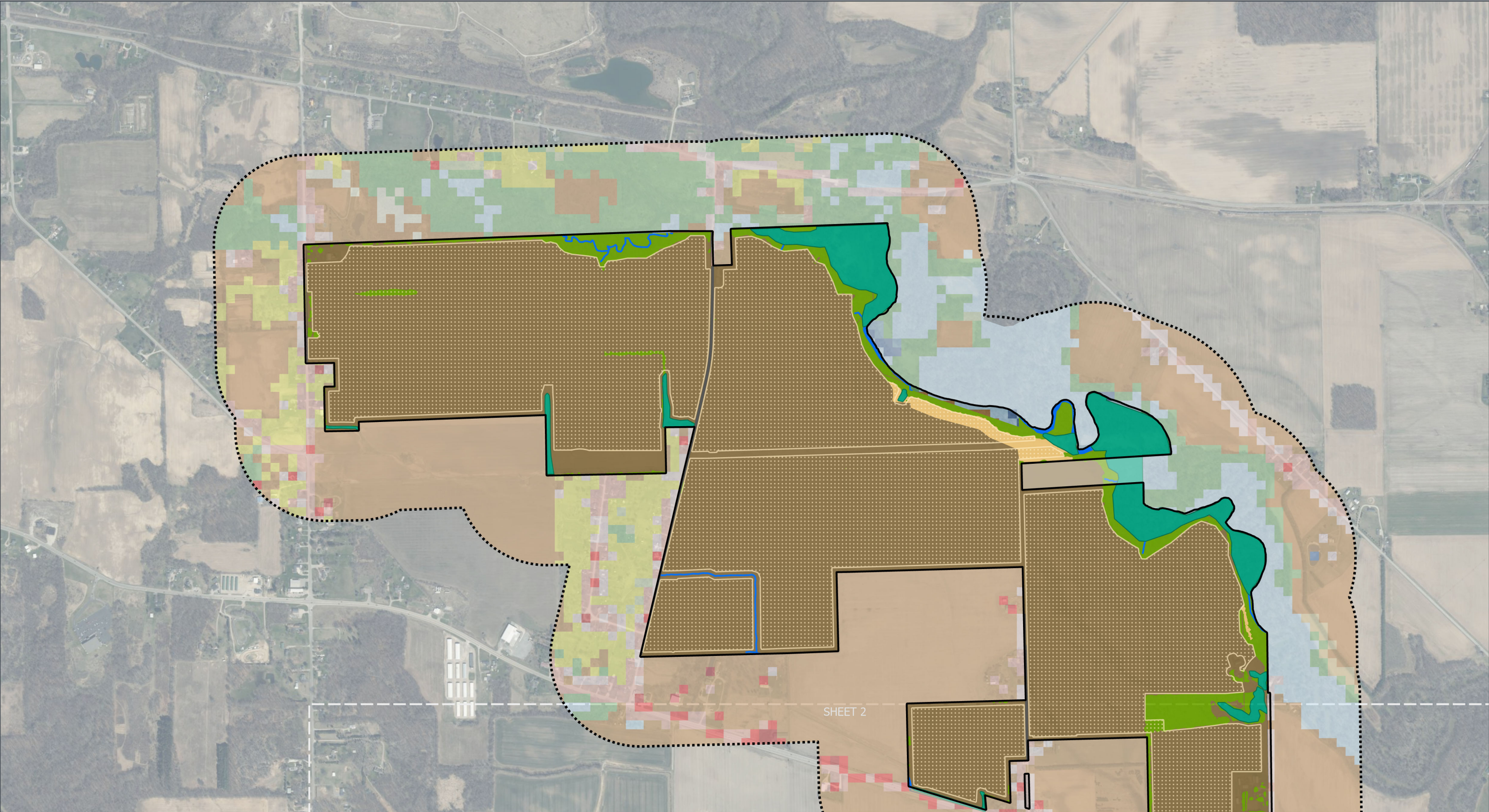
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Project No. 78878
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Meters Feet

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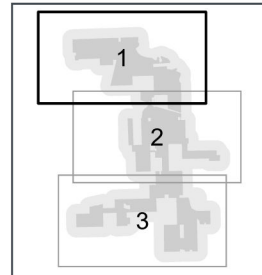
ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 3
Existing Land Use
Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)

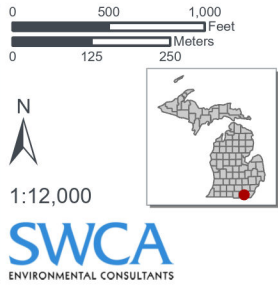
- Land Cover Type (Field-Verified within Project)
- Agriculture
 - Forest
 - Herbaceous
 - Road
 - Stream
 - Wetland

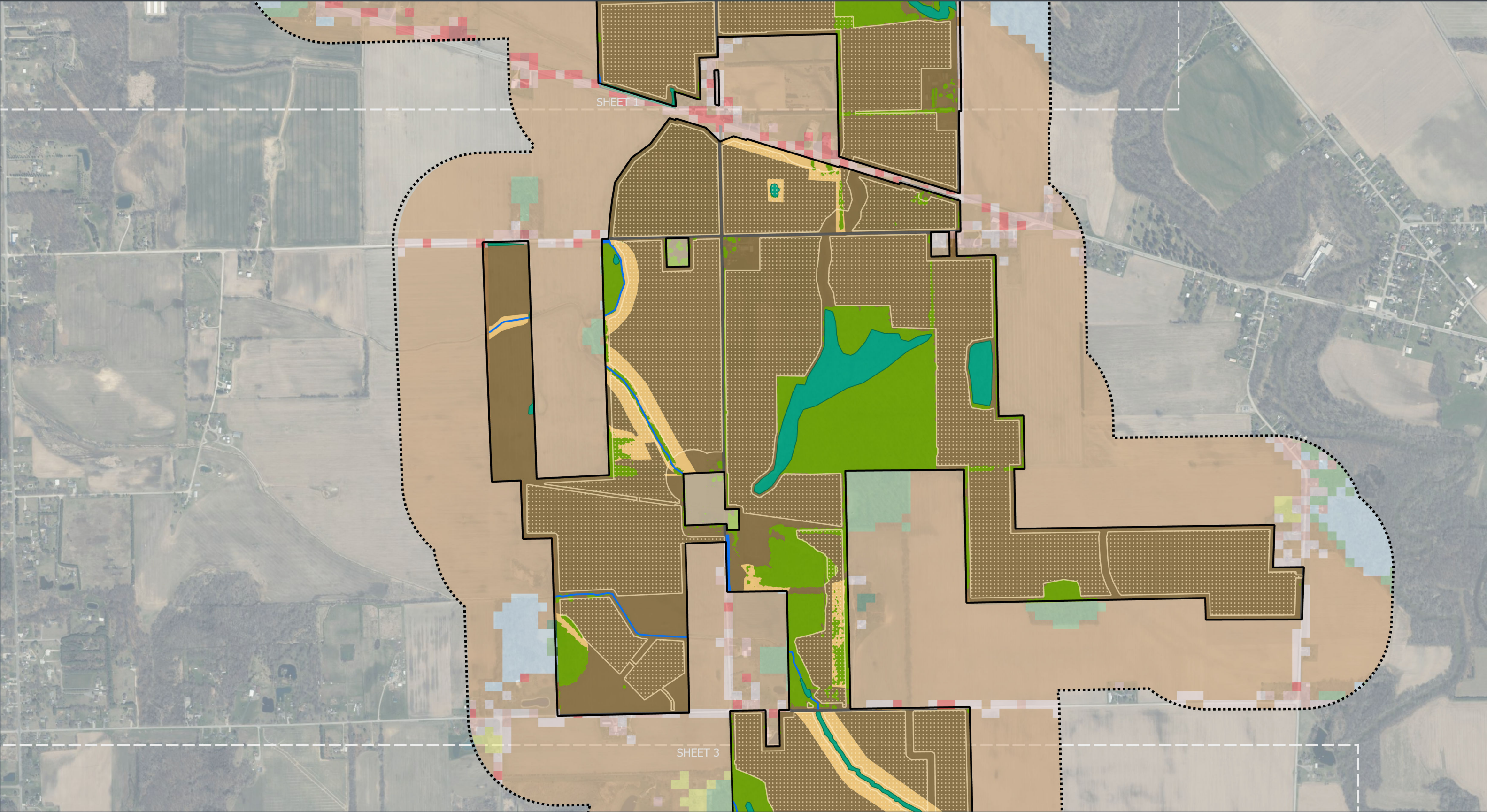
- NLCD Type (Outside of Project)
- Cultivated Crops
 - Deciduous Forest
 - Developed, High Intensity
 - Developed, Low Intensity
 - Developed, Medium Intensity
 - Developed, Open Space
 - Emergent Herbaceous Wetlands

- Hay/Pasture
- Herbaceous
- Mixed Forest
- Open Water
- Shrub/Scrub
- Woody Wetlands



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8782°N 83.9744°W
Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
ExhibitA_1_2_fig3_landUse_Series
Aprx: 78878_Rouget_Permitting





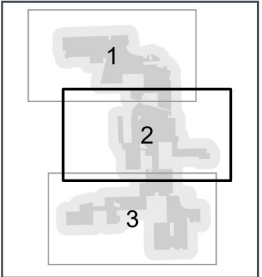
ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 3
Existing Land Use
Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)

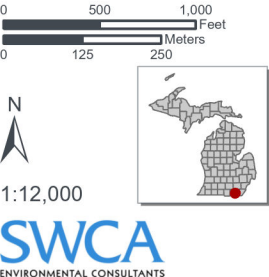
- Land Cover Type (Field-Verified within Project)
- Agriculture
 - Forest
 - Herbaceous
 - Road
 - Stream
 - Wetland

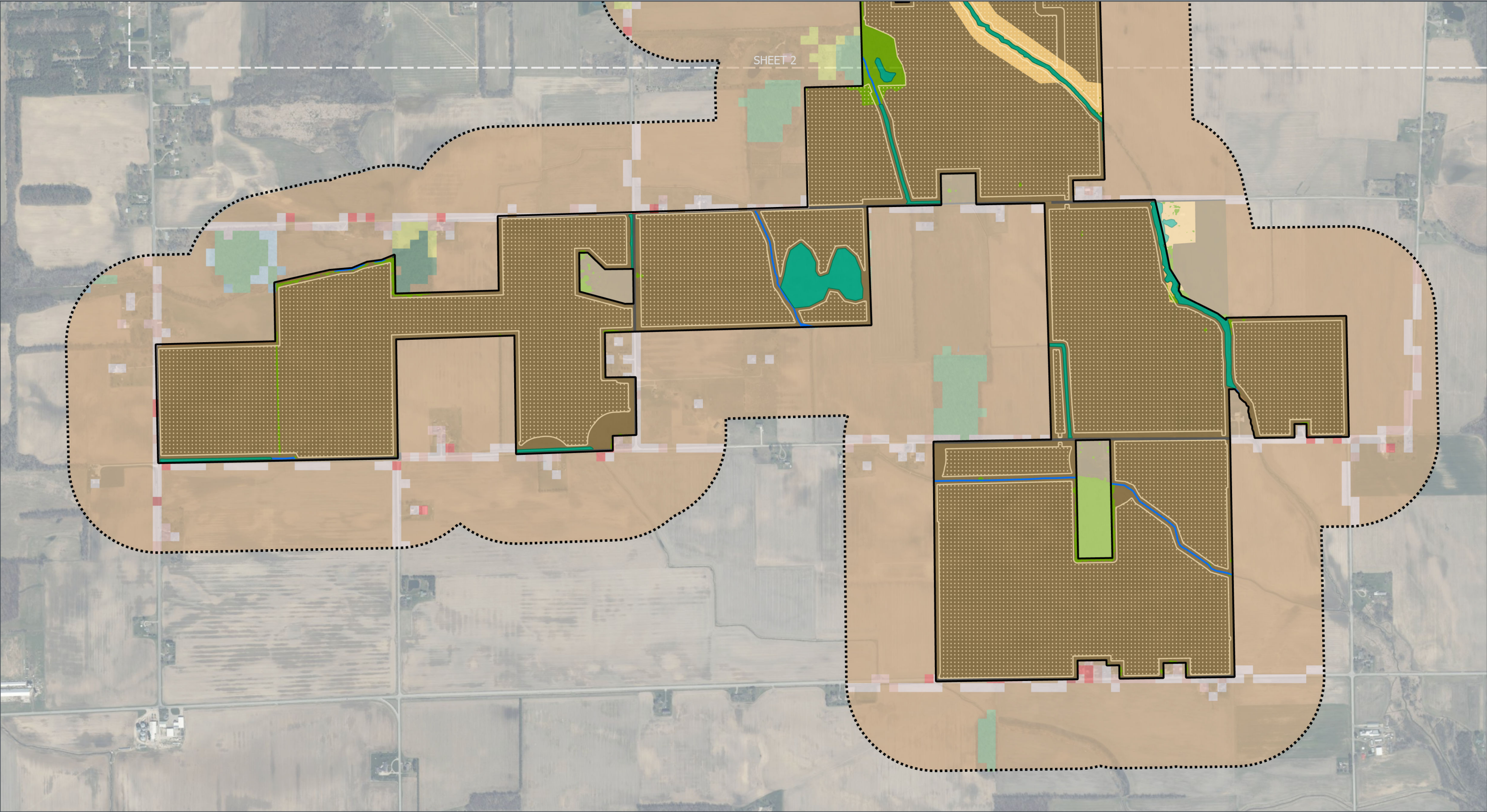
- NLCD Type (Outside of Project)
- Cultivated Crops
 - Deciduous Forest
 - Developed, High Intensity
 - Developed, Low Intensity
 - Developed, Medium Intensity
 - Developed, Open Space

- Evergreen Forest
- Hay/Pasture
- Open Water
- Shrub/Scrub
- Woody Wetlands



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8568°N 83.962°W
Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
ExhibitA_1_2_fig3_landUse_Series
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 3
Existing Land Use
Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)

Land Cover Type (Field-Verified within Project)

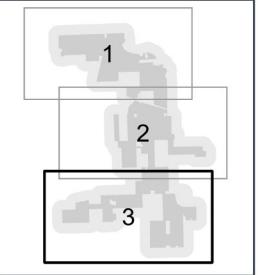
- Agriculture
- Forest
- Herbaceous
- Road
- Stream
- Wetland

NLCD Type (Outside of Project)

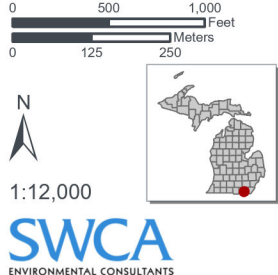
- Cultivated Crops
- Deciduous Forest
- Developed, High Intensity
- Developed, Low Intensity
- Developed, Medium Intensity
- Developed, Open Space

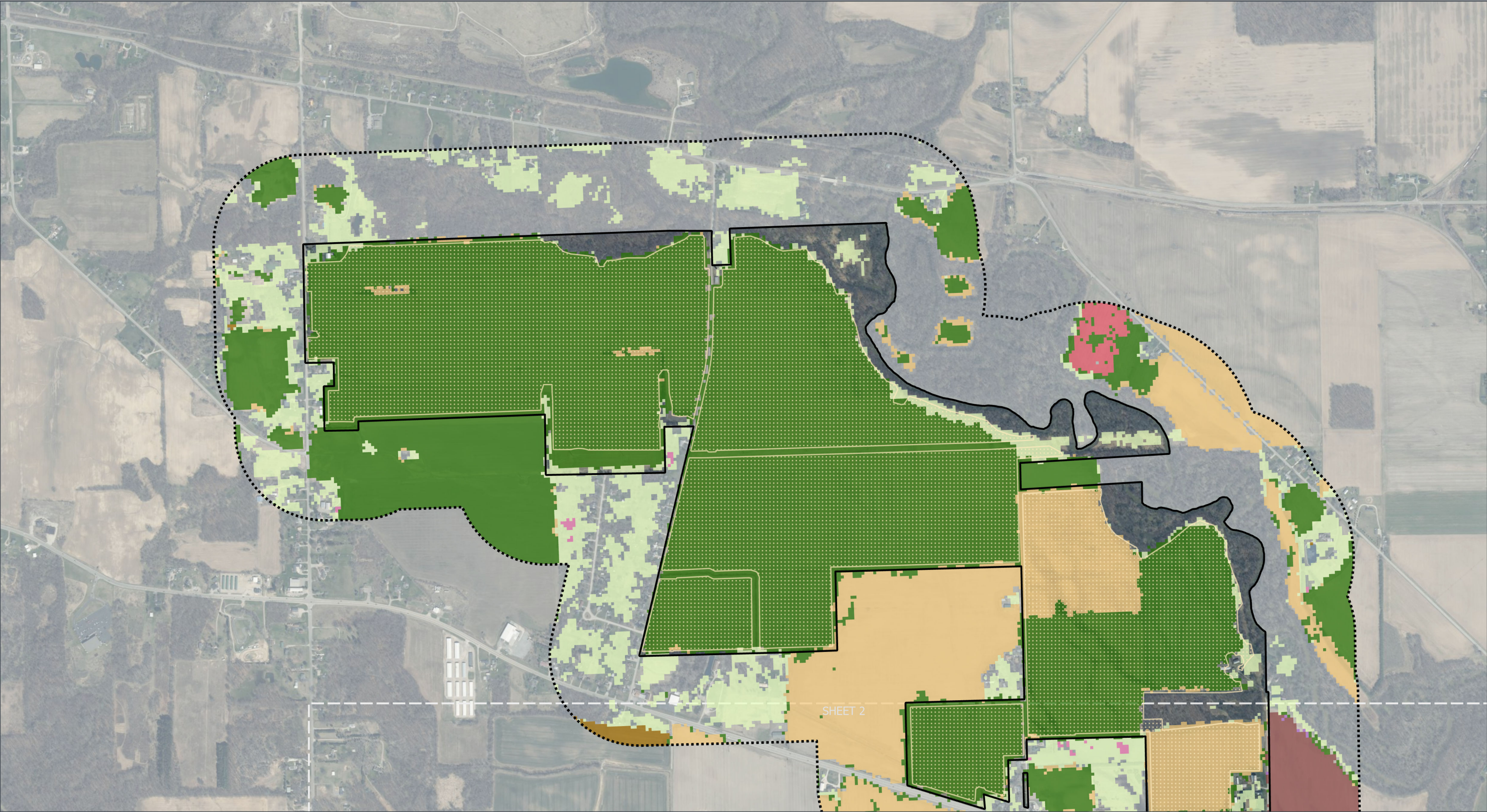
Emergent Herbaceous Wetlands

- Evergreen Forest
- Hay/Pasture
- Shrub/Scrub
- Woody Wetlands



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8341°N 83.9674°W
Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
ExhibitA_1_2_fig3_landUse_Series
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM

Exhibit A-1.2

Figure 4

USDA Cropland Data

Site Plan Boundary (~1,606 acres)

Leased Area / Project Boundary (~2,133 acres)

Primary Crops

Alfalfa	Pumpkins
Corn	Soybeans
Grassland/Pasture	Tomatoes
Potatoes	Winter Wheat

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8782°N 83.9744°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
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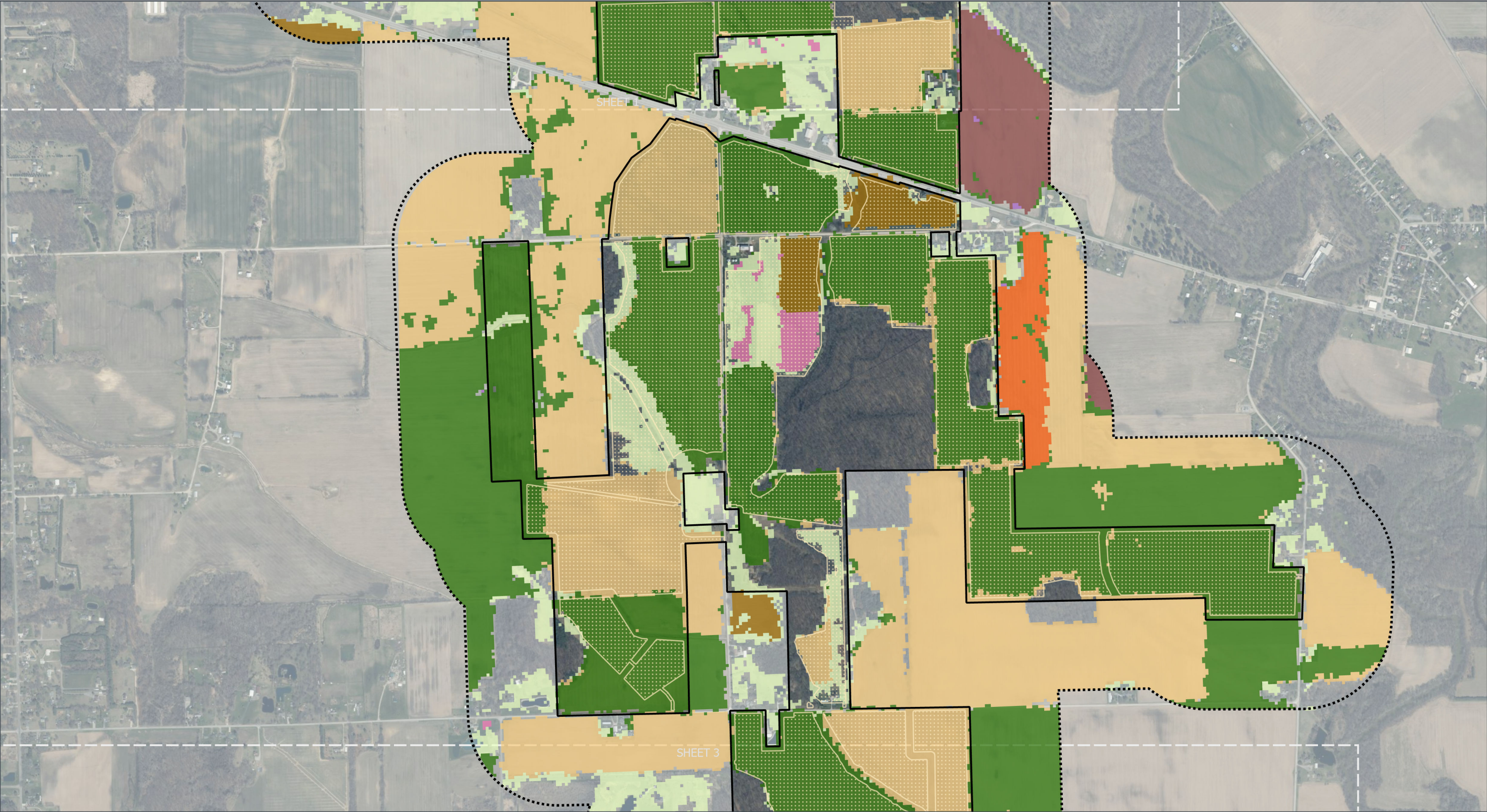
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ROUGET ROAD SOLAR FARM

Exhibit A-1.2

Figure 4

USDA Cropland Data

Site Plan Boundary (~1,606 acres)

Leased Area / Project Boundary (~2,133 acres)

Primary Crops

Alfalfa	Potatoes
Corn	Soybeans
Grassland/Pasture	Tomatoes
Peppers	Winter Wheat

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8568°N 83.962°W

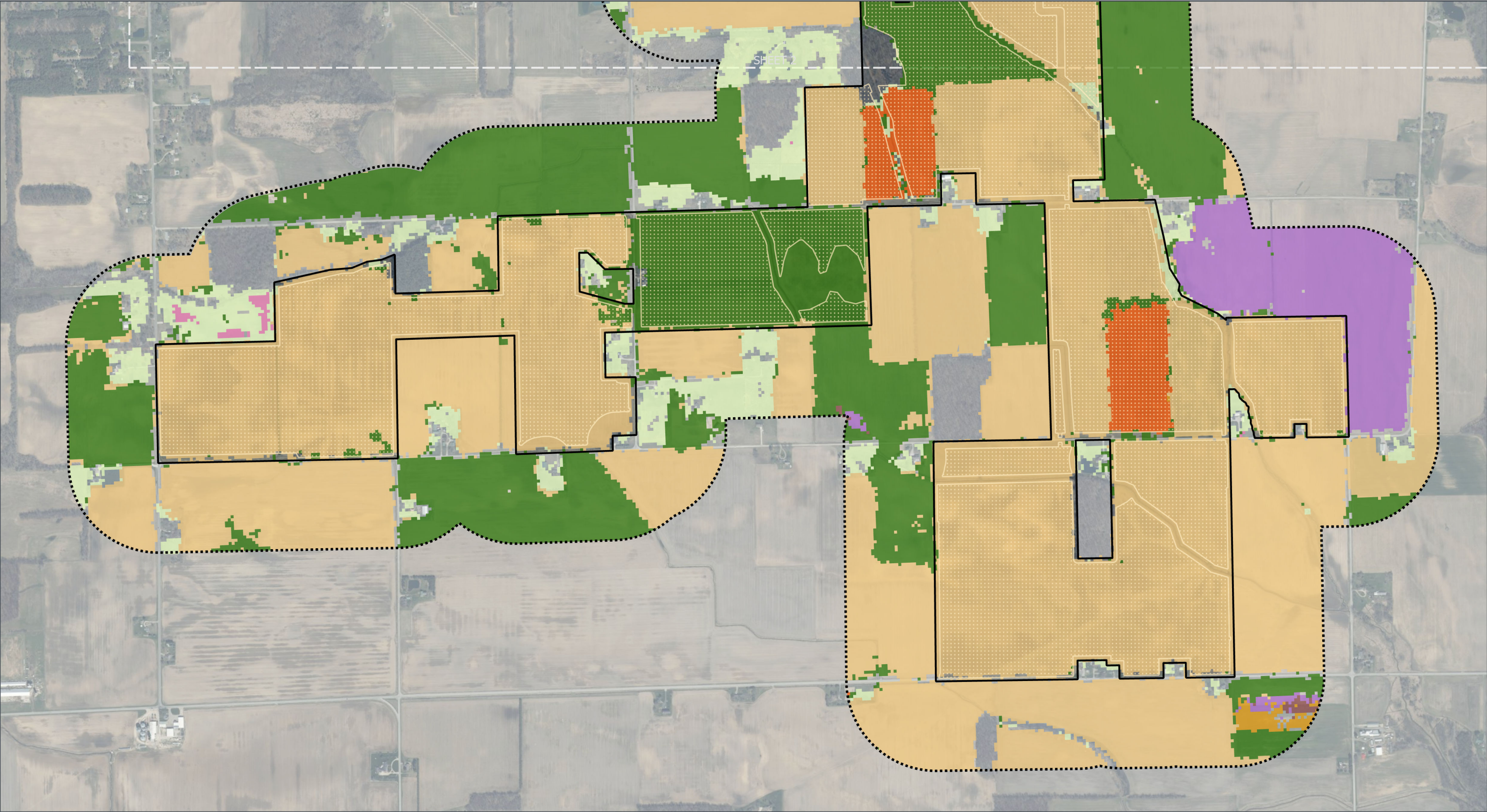
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ROUGET ROAD SOLAR FARM

Exhibit A-1.2

Figure 4

USDA Cropland Data

Site Plan Boundary (~1,606 acres)

Leased Area / Project Boundary (~2,133 acres)

Primary Crops

Alfalfa	Potatoes
Corn	Soybeans
Grassland/Pasture	Sweet Corn
Peppers	Tomatoes

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8341°N 83.9674°W

Base Map: Esri ArcGIS Online,
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Updated: 11/6/2025
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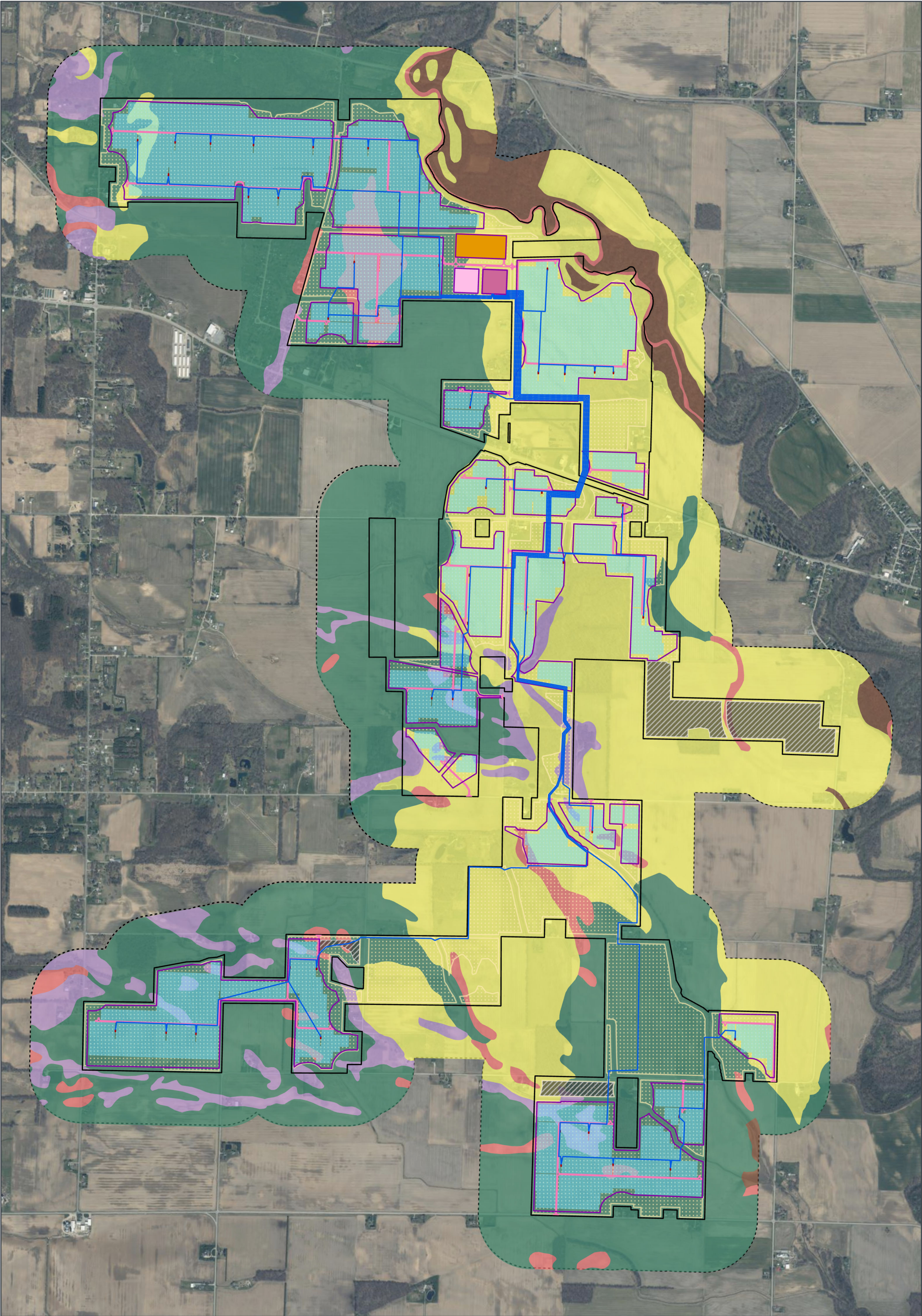
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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 5
Prime Farmland
Map

- Proposed Layout**

 - Underground Cable
 - Fence
 - Access Road
 - Inverter
 - Solar Panel
 - Laydown Area
 - O&M Pad
 - Substation Pad
- Farmland Class**

 - All areas are prime farmland
 - Farmland of local importance
 - Not prime farmland
 - Prime farmland if drained
 - Prime farmland if protected from flooding or not frequently flooded during the growing season
- Other Features**

 - Switchyard Pad
 - Site Plan Boundary (~1,606 acres)
 - Leased Area / Project Boundary (2,142 acres)
 - 1,000-foot Buffer

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8546°N 83.9658°W

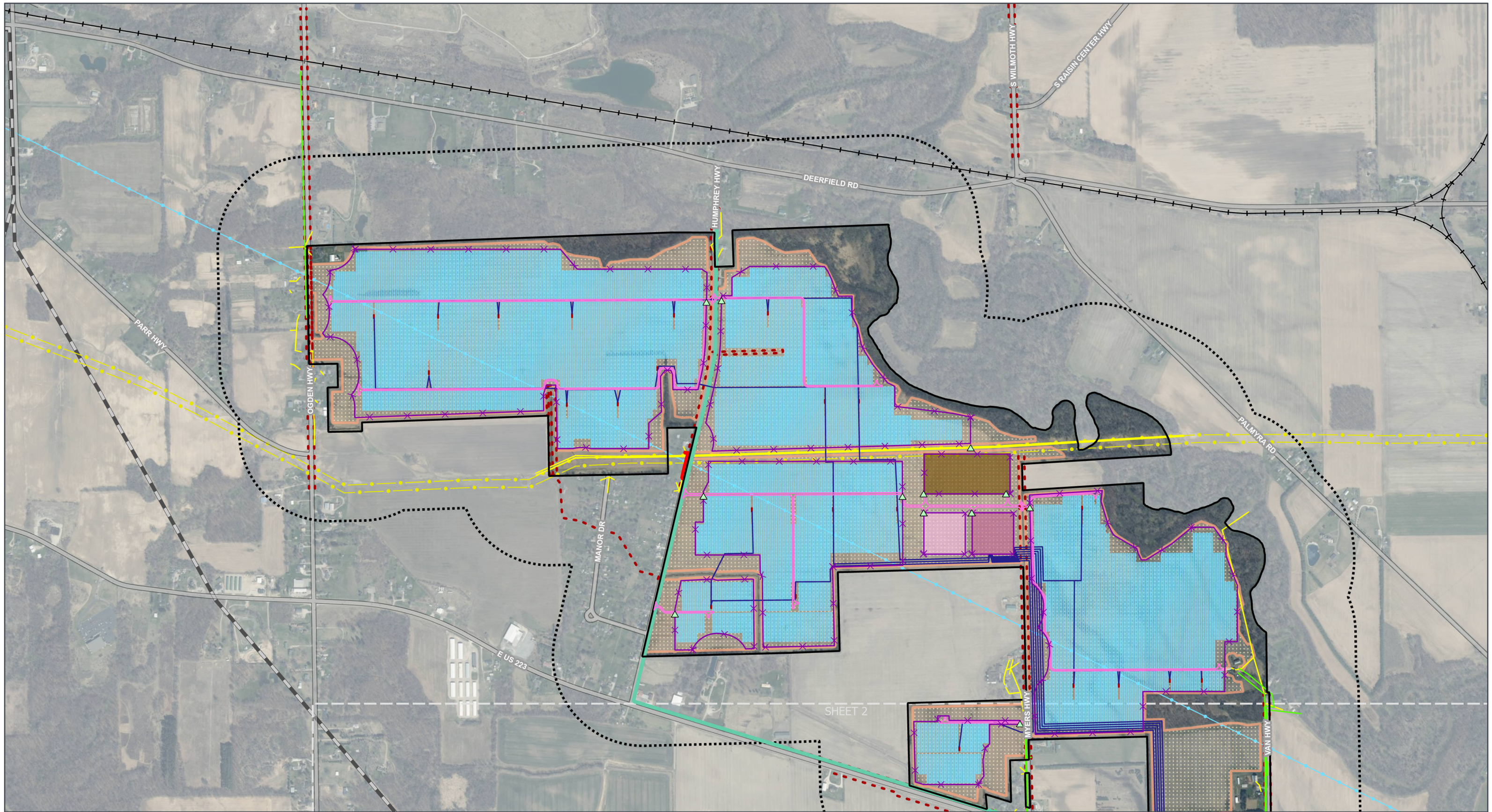
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Project No. 78878
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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 6
Existing Utilities Map

Sheet 1 of 3

Proposed Layout

- Gate
- Fence
- Access Road
- Underground Cable
- Inverter
- Solar Panel

Proposed Layout

- Laydown Area
- O&M Pad
- Substation Pad
- Switchyard Pad
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1,000-foot Buffer

Utilities in Project (Alta Survey)

- Easement or ROW
- Electric Overhead
- Telecommunications
- Underground Natural Gas Line
- Wastewater Line
- Cell Tower

Utilities Outside of Project (Approximate)

- Roads
- 100-161 (Kilovolts) Transmission Line
- Other Transmission Line
- Underground Natural Gas Transmission Pipelines
- Railroad

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8782°N 83.9744°W

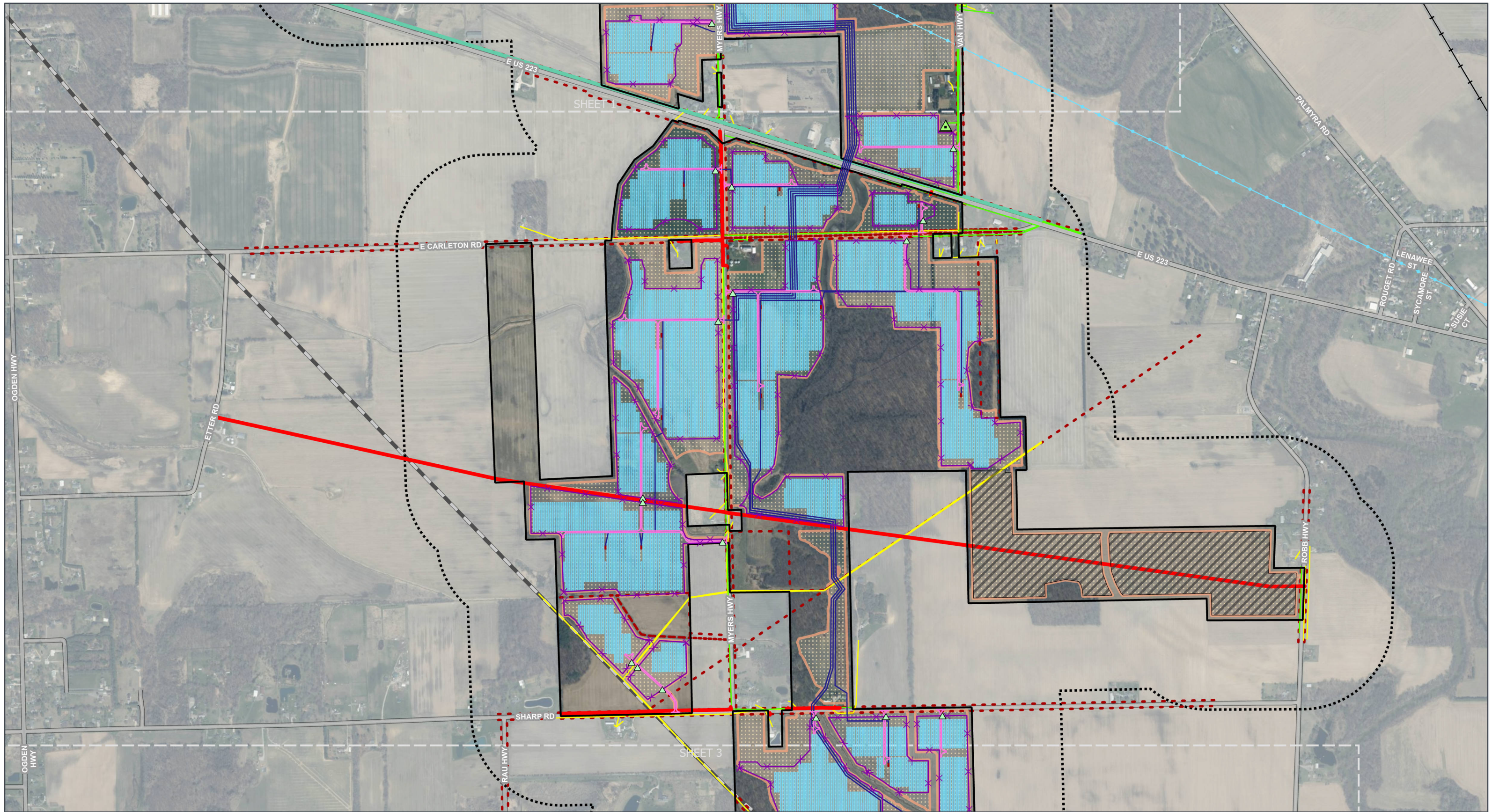
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Updated: 7/21/2026
Project No. 78878
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ROUGET ROAD SOLAR FARM

Exhibit A-1.2

Figure 6

Existing Utilities Map

Sheet 2 of 3

Proposed Layout

- △ Gate
- ✕ Fence
- Access Road
- Underground Cable
- Inverter
- Solar Panel
- ▨ Laydown Area

Site Plan Boundary (~1,606 acres)

Leased Area / Project Boundary (~2,133 acres)

1,000-foot Buffer

Utilities in Project (Alta Survey)

- - - Easement or ROW
- Electric Overhead
- Telecommunications
- Underground Natural Gas Line

Wastewater Line

Cell Tower

Utilities Outside of Project (Approximate)

- Roads
- Other Transmission Line
- Underground Natural Gas Transmission Pipelines
- Railroad

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8568°N 83.962°W

Base Map: Esri ArcGIS Online,
accessed July 2026
Updated: 7/21/2026
Project No. 78878
ExhibitA_1_2_fig6_utility_Series
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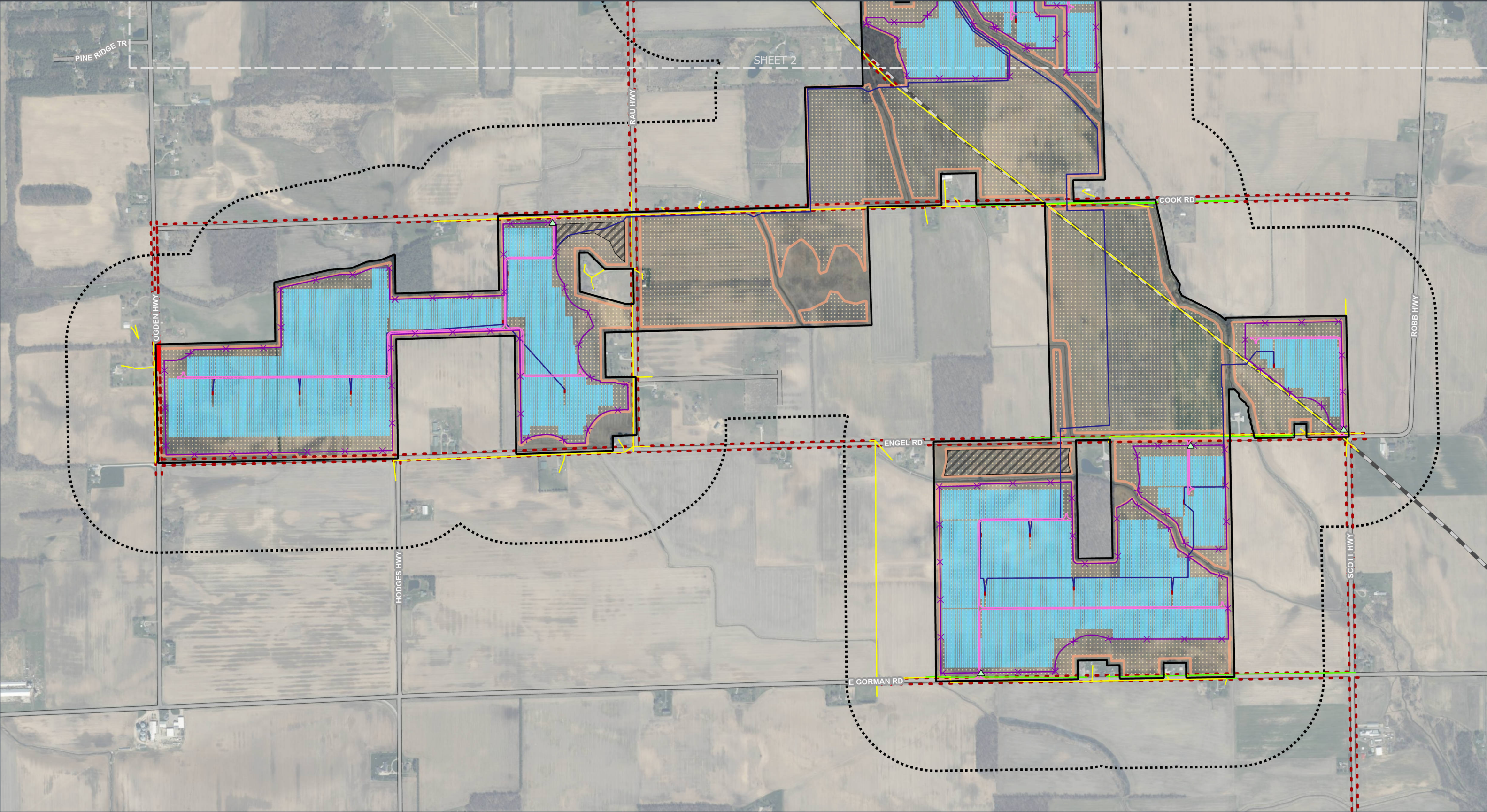
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ROUGET ROAD SOLAR FARM

Exhibit A-1.2

Figure 6

Existing Utilities Map

Proposed Layout

- △ Gate
- × Fence
- Access Road
- Underground Cable
- Inverter
- Solar Panel
- ▨ Laydown Area

Site Plan Boundary (~1,606 acres)

▭ Leased Area / Project Boundary (~2,133 acres)

⋯ 1,000-foot Buffer

Utilities in Project (Alta Survey)

- - - Easement or ROW
- Electric Overhead
- Telecommunications
- Underground Natural Gas Line

Utilities Outside of Project (Approximate)

- Wastewater Line
- △ Cell Tower
- Roads
- Other Transmission Line
- Underground Natural Gas Transmission Pipelines
- Railroad

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8341°N 83.9674°W

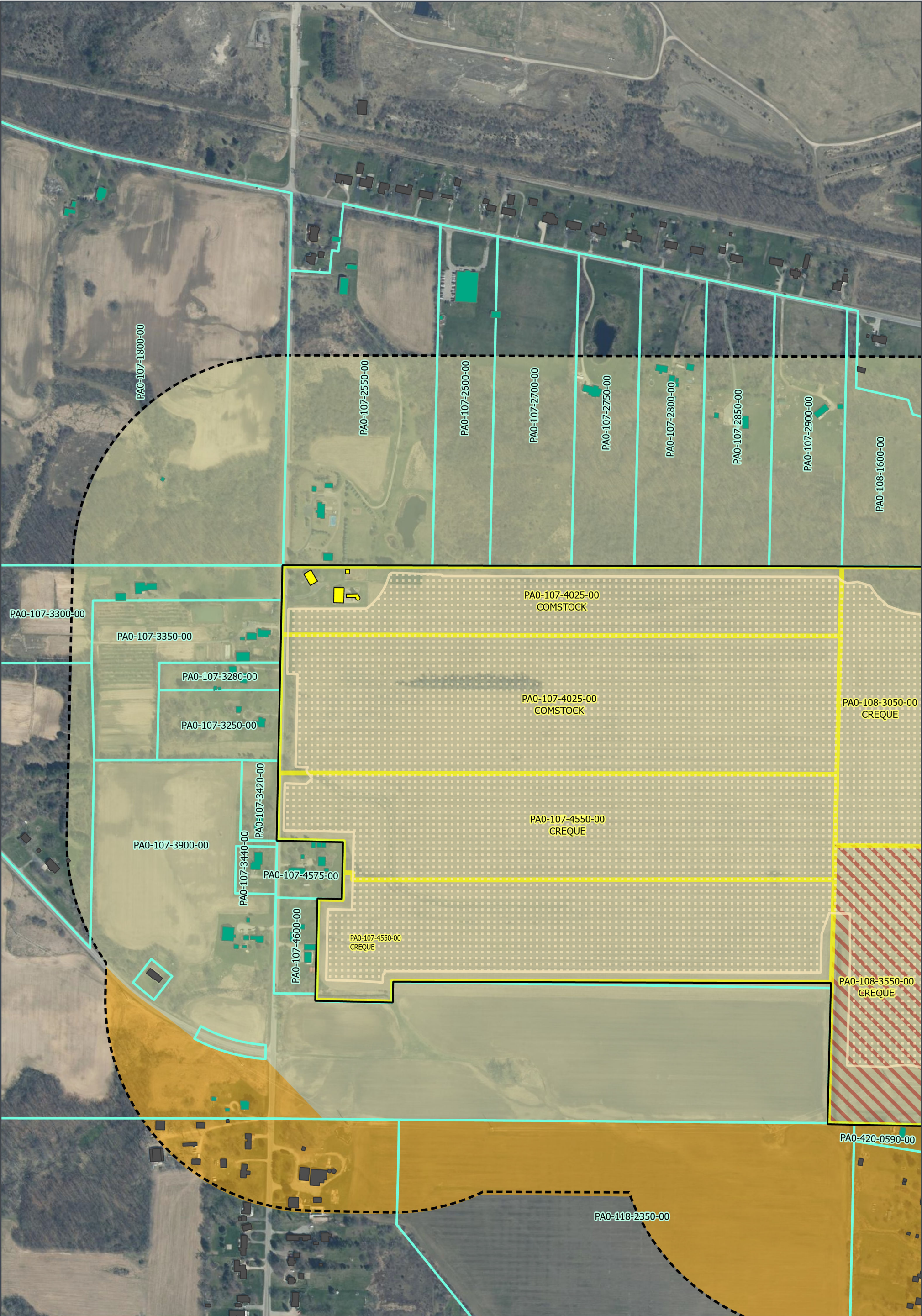
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Aprx: 78878_Rouget_Permitting

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Feet
Meters

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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

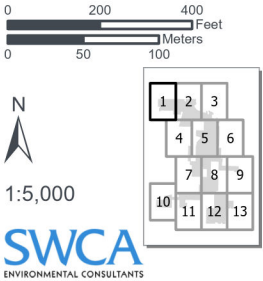
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Participating Parcels

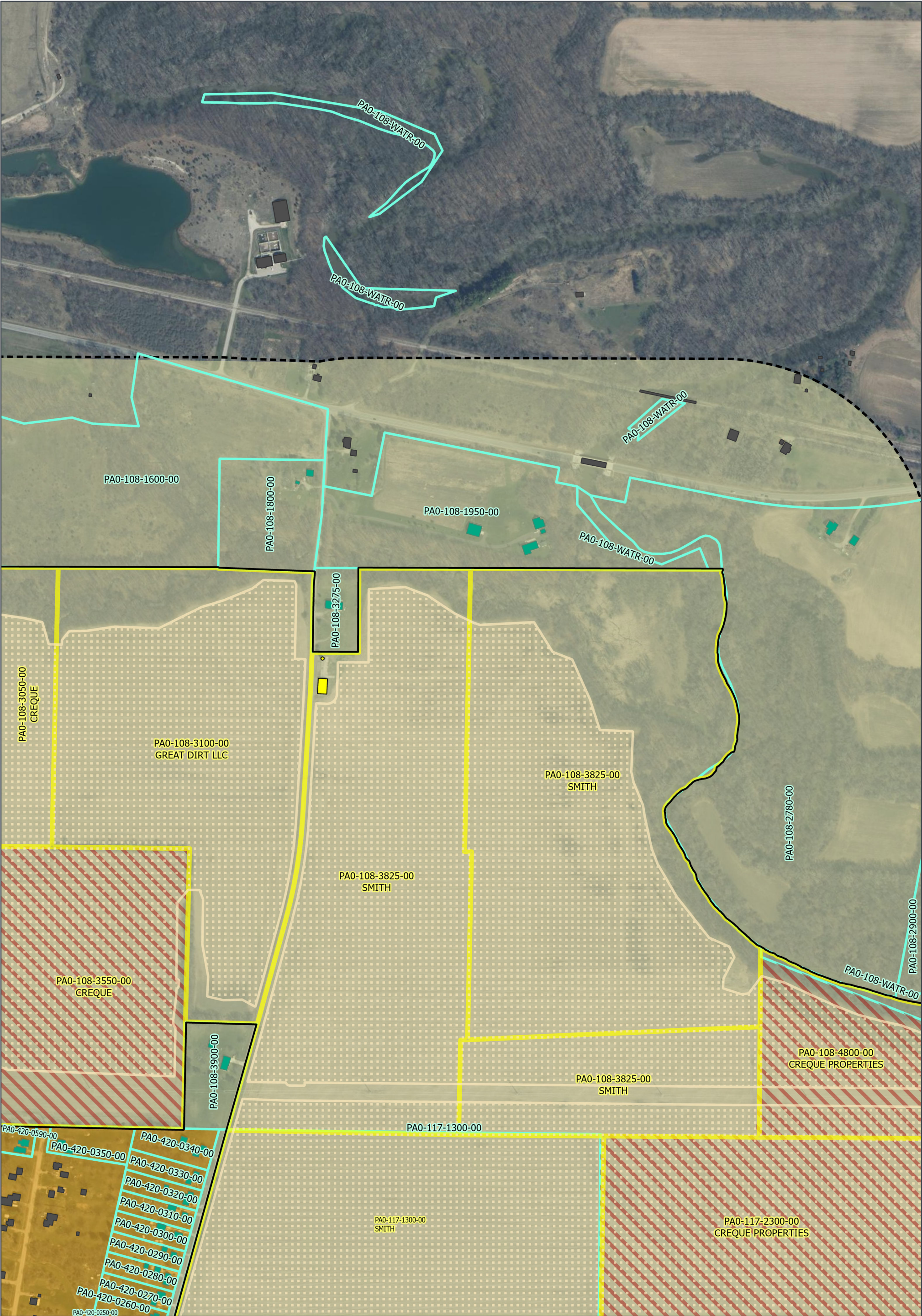
- Potentially Occupied Building on Participating Parcel
- Adjacent Parcels
- Potentially Occupied Building on Adjacent Parcel
- Potentially Occupied Building on Other Parcel

- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)
- Farming
- Residential and Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.882°N 83.9892°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

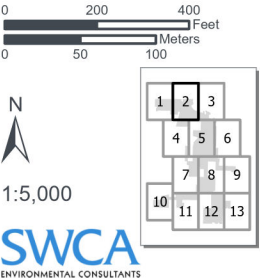
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Participating Parcels

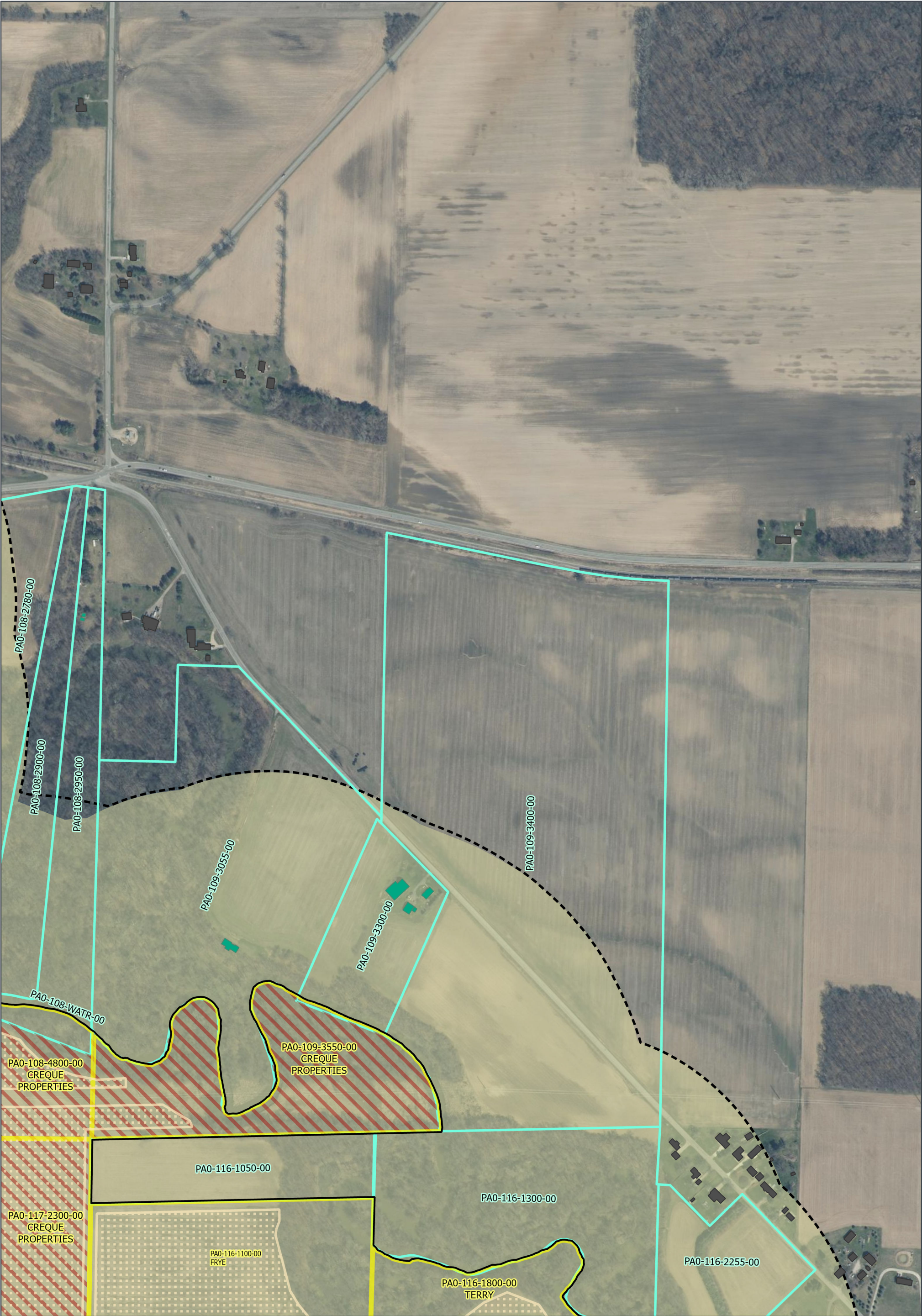
- Potentially Occupied Building on Participating Parcel
- Adjacent Parcels
- Potentially Occupied Building on Adjacent Parcel
- Potentially Occupied Building on Other Parcel

- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)
- Farming
- Residential and Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8825°N 83.9731°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting





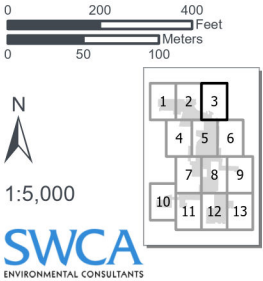
ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Participating Parcels
- Adjacent Parcels

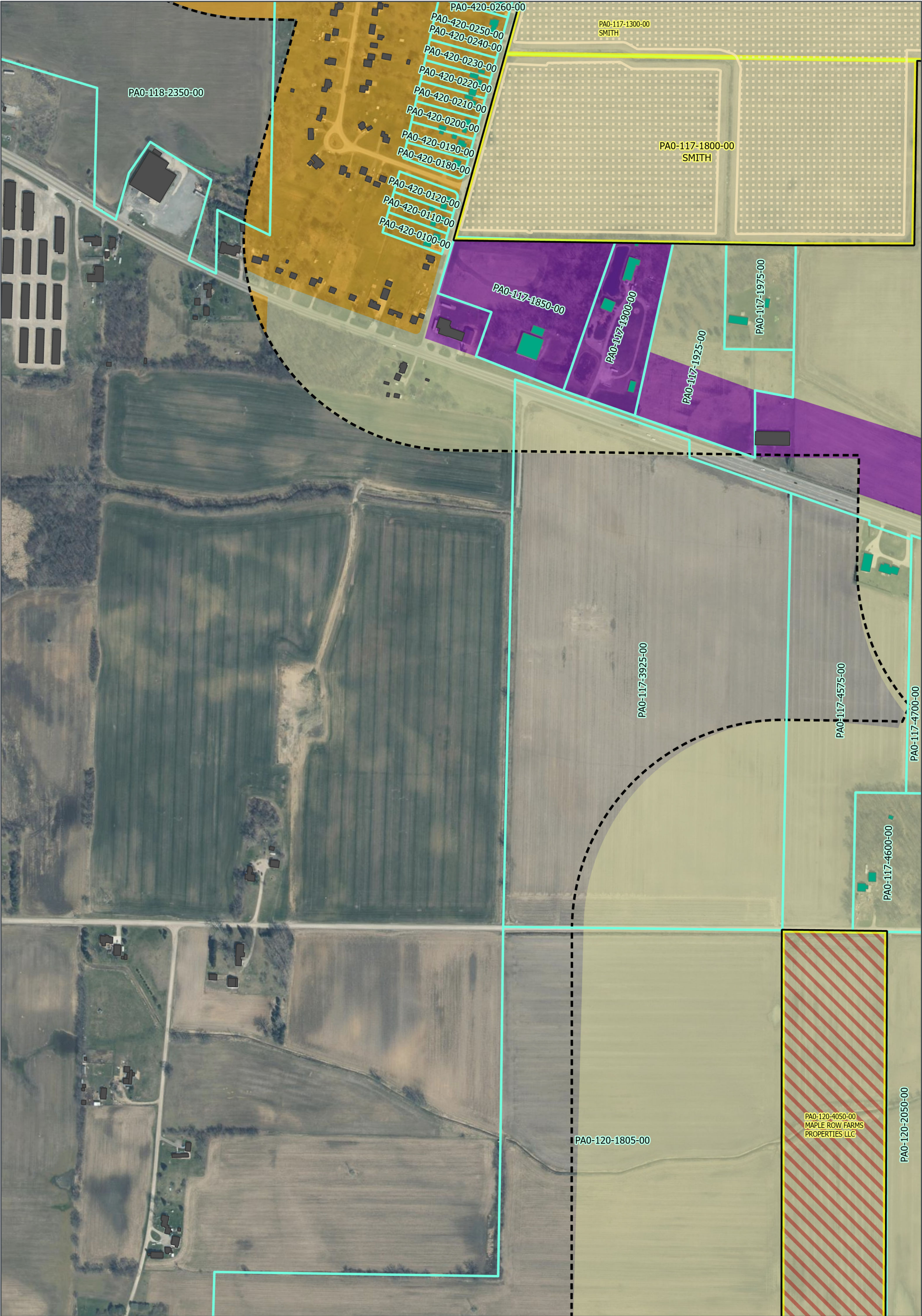
- Potentially Occupied Building on Adjacent Parcel
- Potentially Occupied Building on Other Parcel
- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)
- Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8829°N 83.9571°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7_parcelSeries
Aprx: 78878_Rouget_Permitting



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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Participating Parcels
- Adjacent Parcels
- Potentially Occupied Building on Adjacent Parcel

- Potentially Occupied Building on Other Parcel
- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)**
- Farming
- Light Industrial
- Residential and Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8652°N 83.9783°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7_parcelSeries
Aprx: 78878_Rouget_Permitting

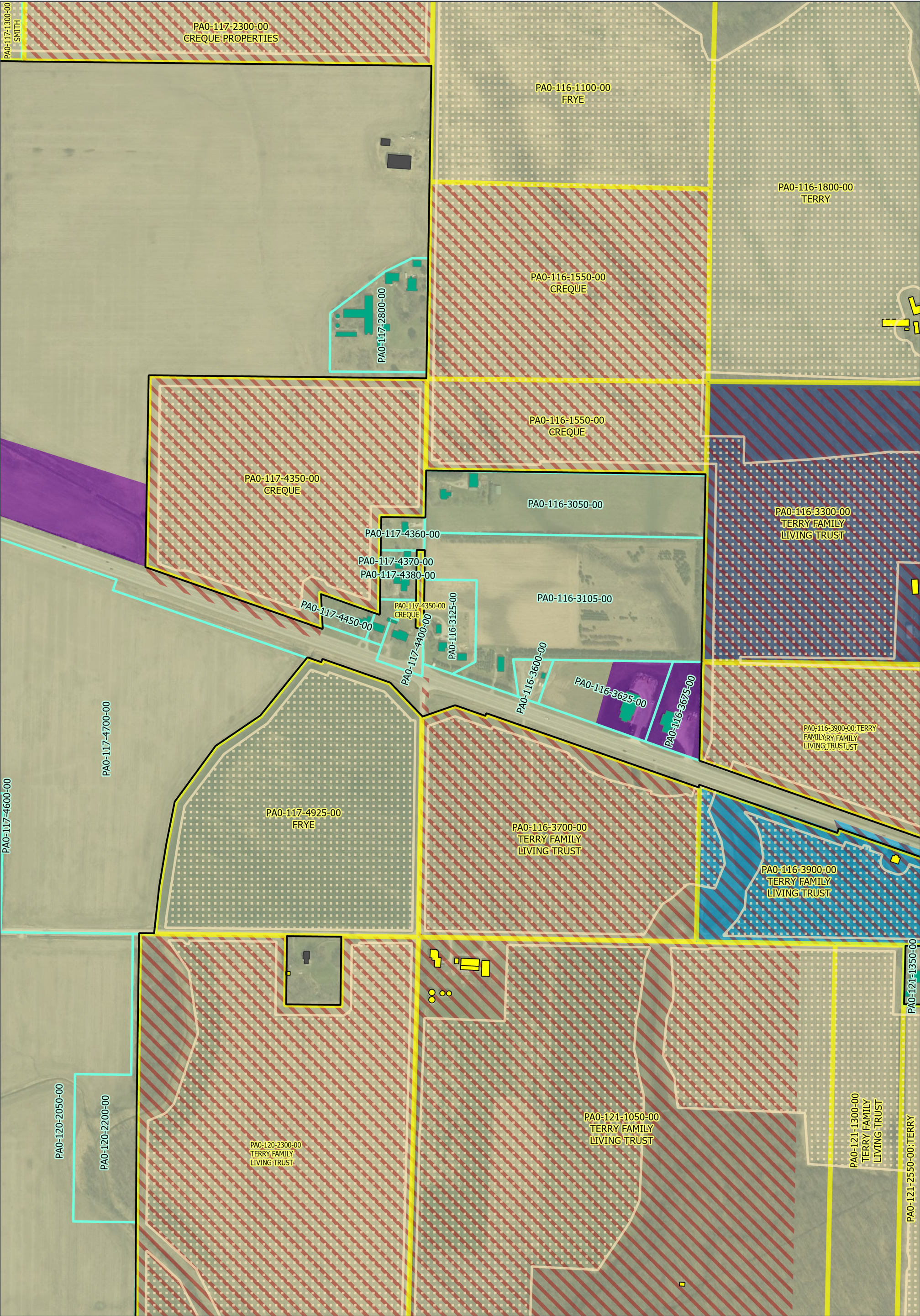
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SWCA
ENVIRONMENTAL CONSULTANTS

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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

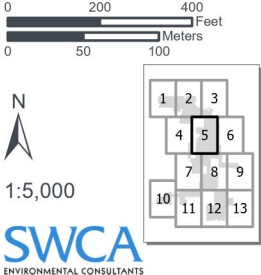
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Collection Only Parcel
- Participating Parcels

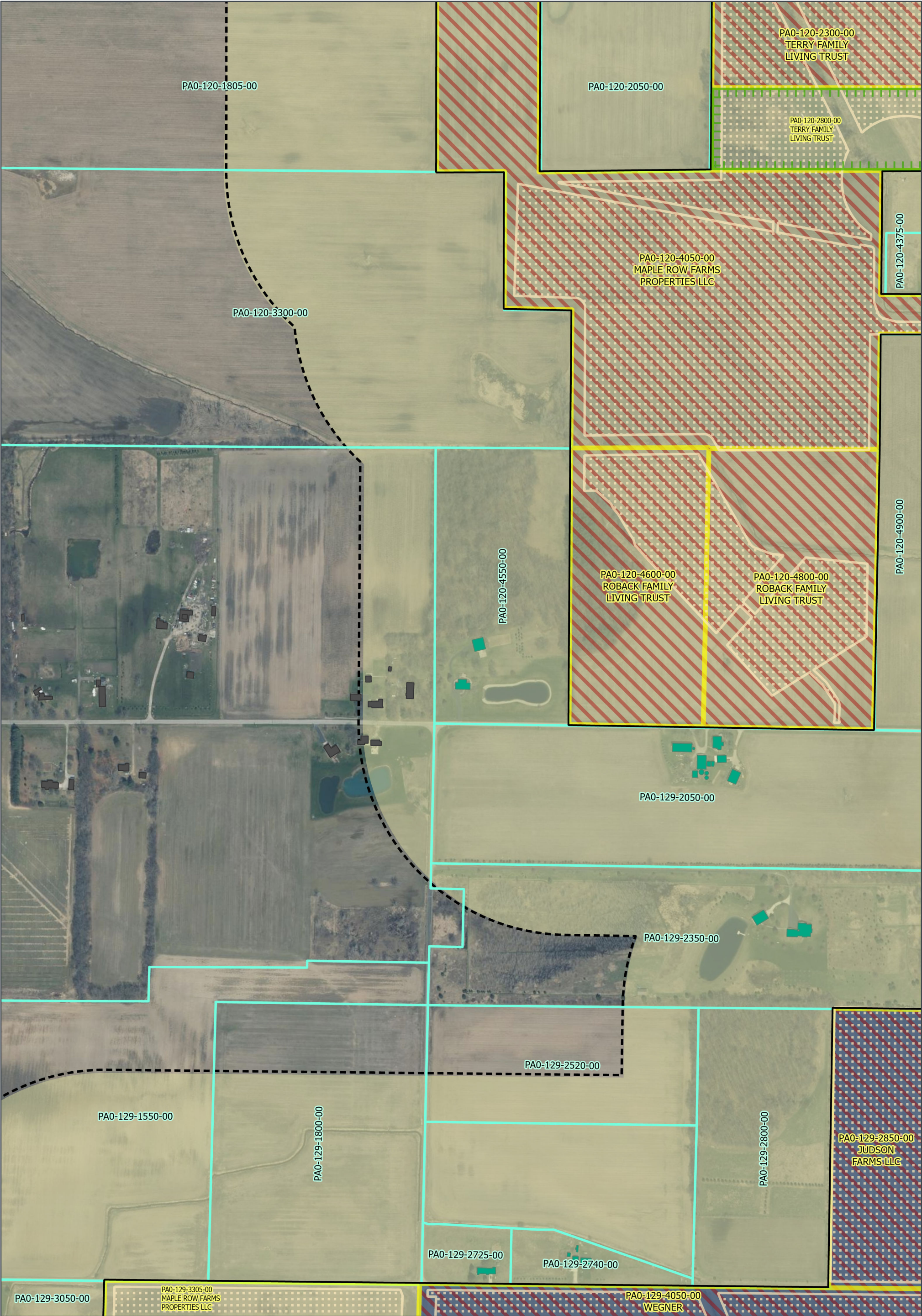
- Potentially Occupied Building on Participating Parcel
- Adjacent Parcels
- Potentially Occupied Building on Adjacent Parcel
- Potentially Occupied Building on Other Parcel

- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)
 - Commercial
 - Farming
 - Light Industrial

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8656°N 83.9623°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning,
and PA116 Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Collection Only Parcel
- Participating Parcels
- Adjacent Parcels

- Potentially Occupied Building on Adjacent Parcel
 - Potentially Occupied Building on Other Parcel
 - CRP Easement
 - Michigan Farmland Development Rights Agreement (Formerly PA 116)
 - Farming
- Palmyra Twp Zoning (Digitized by SWCA)

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8482°N 83.9715°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting

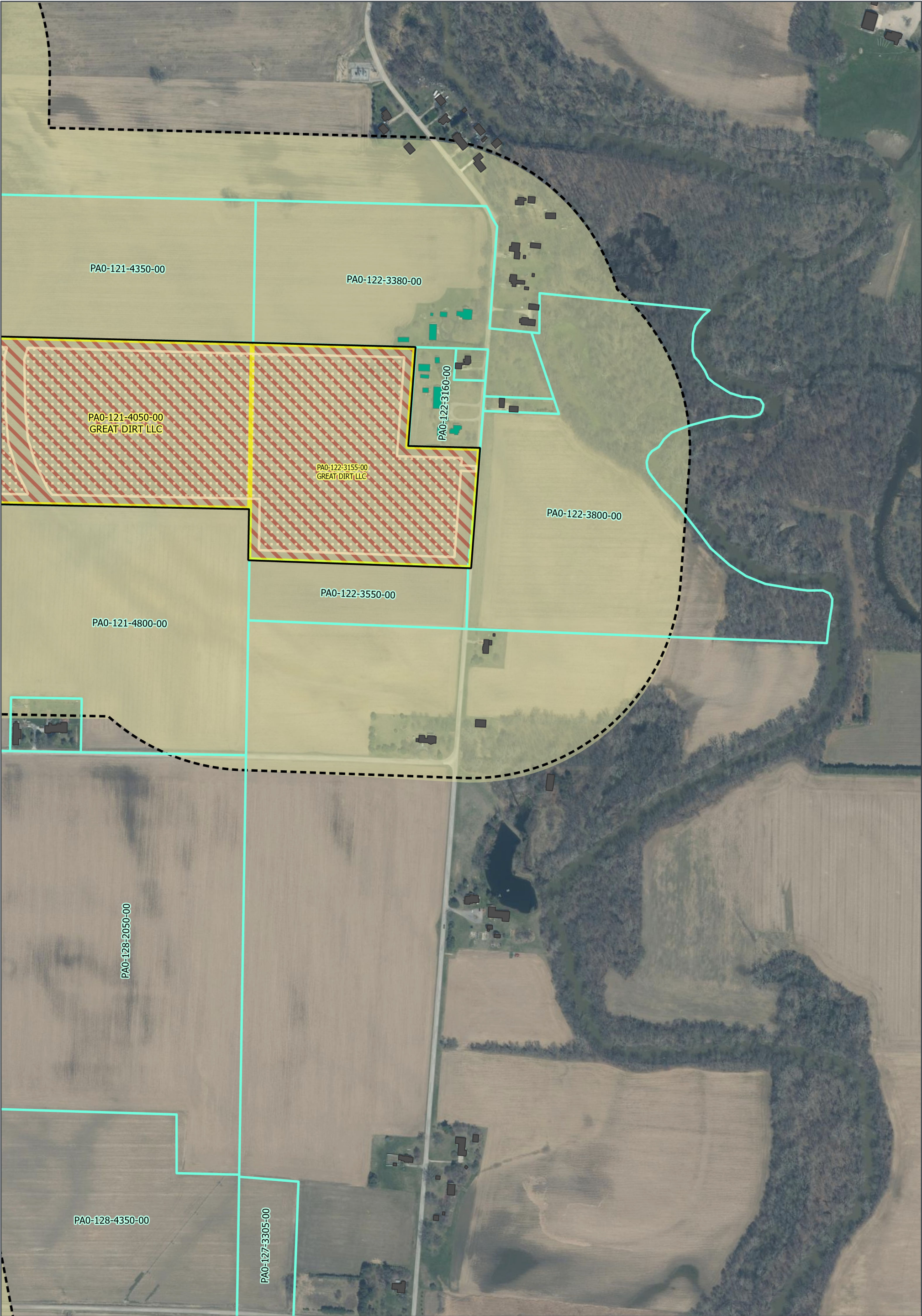
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SWCA
ENVIRONMENTAL CONSULTANTS

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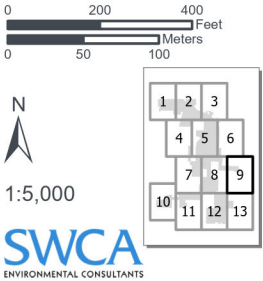
ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning,
and PA116 Map

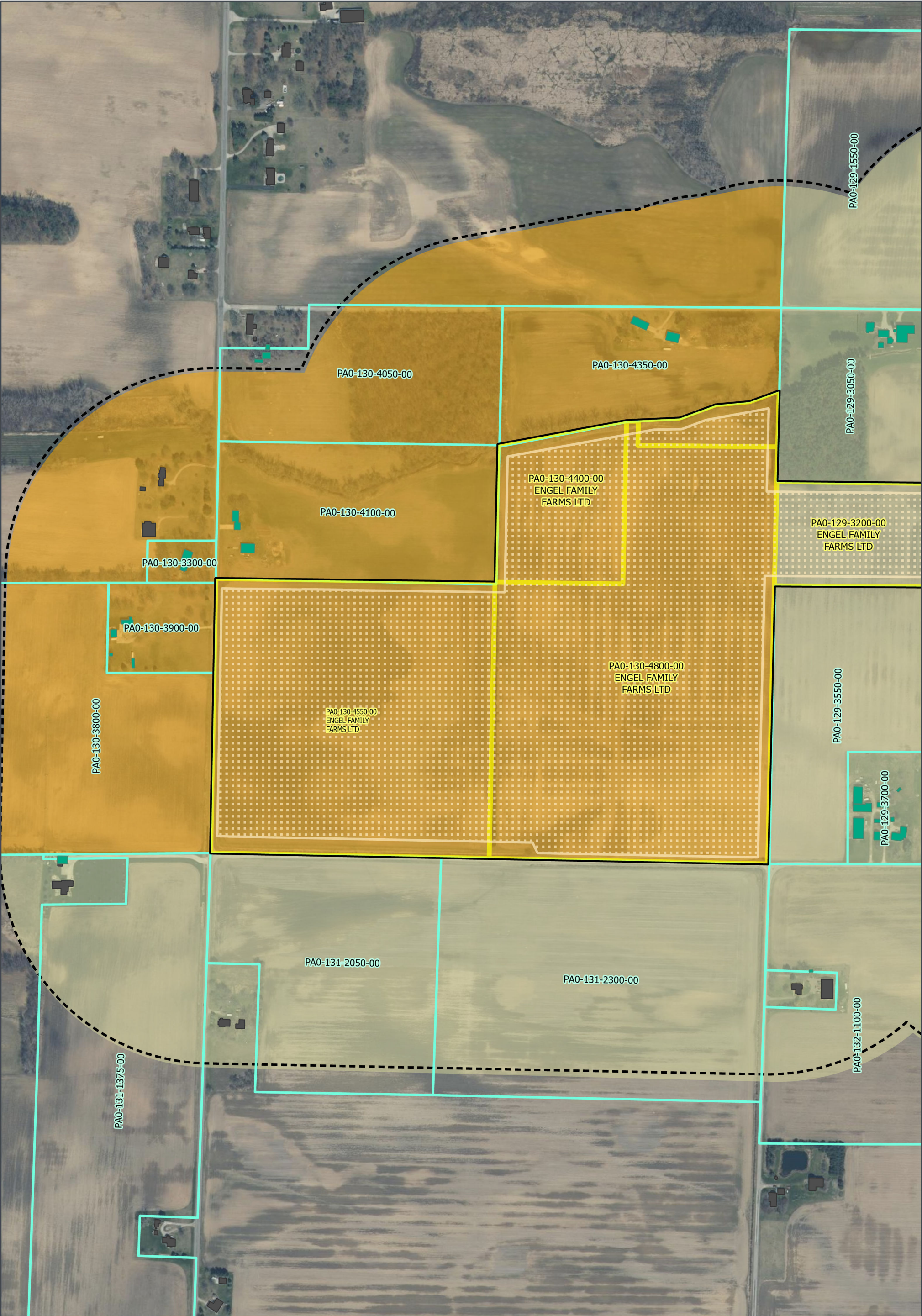
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Participating Parcels
- Adjacent Parcels

- Potentially Occupied Building on Adjacent Parcel
- Potentially Occupied Building on Other Parcel
- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)
- Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.849°N 83.9394°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7_parcelSeries
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Participating Parcels
- Adjacent Parcels

- Potentially Occupied Building on Adjacent Parcel
- Potentially Occupied Building on Other Parcel
- Palmyra Twp Zoning (Digitized by SWCA)
- Farming
- Residential and Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8351°N 83.987°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1_2_fig7_parcelSeries
Aprx: 78878_Rouget_Permitting

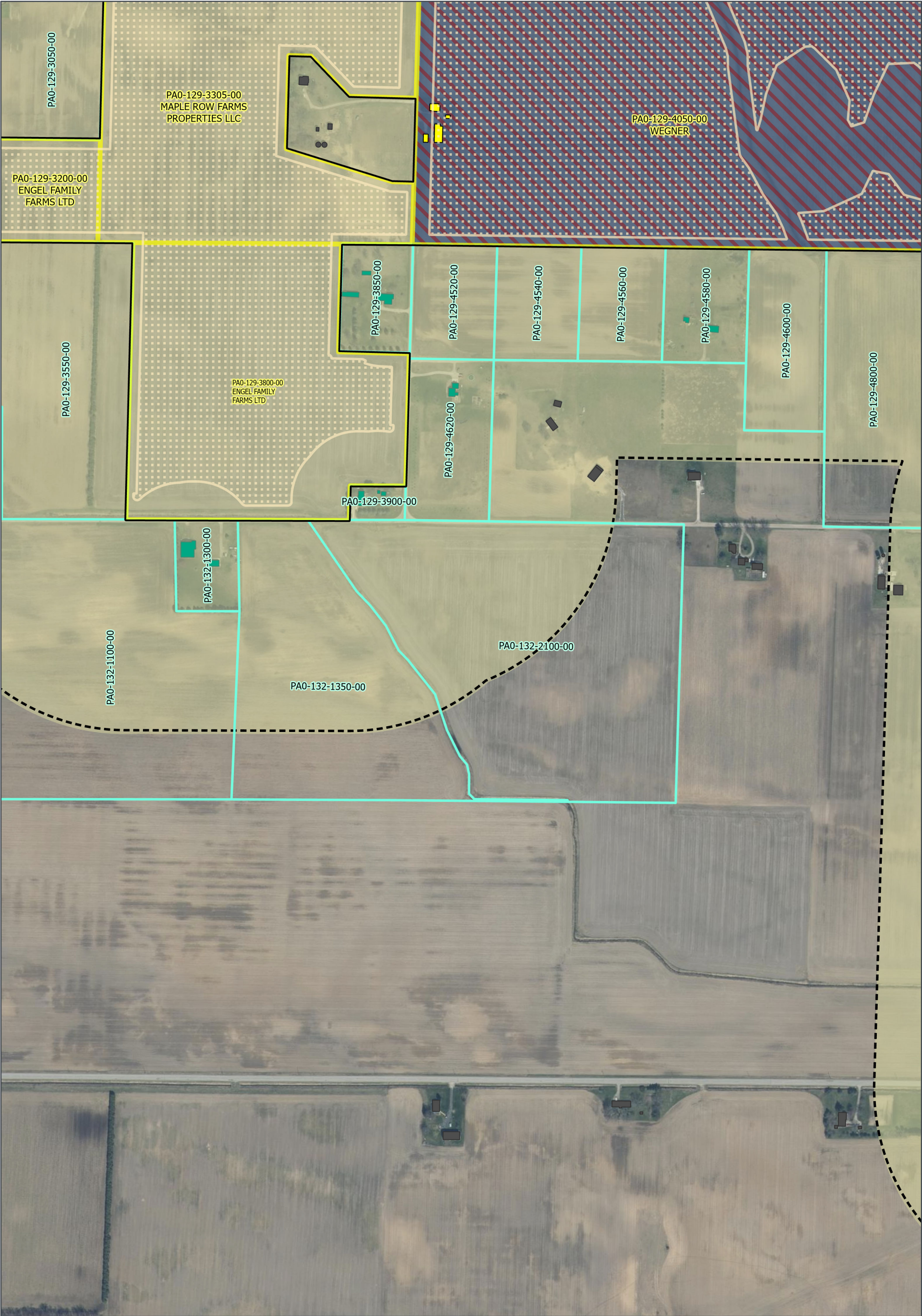
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SWCA
ENVIRONMENTAL CONSULTANTS

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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Collection Only Parcel

- Participating Parcels
- Potentially Occupied Building on Participating Parcel
- Adjacent Parcels
- Potentially Occupied Building on Adjacent Parcel

- Potentially Occupied Building on Other Parcel
- Michigan Farmland Development Rights Agreement (Formerly PA 116)
- Palmyra Twp Zoning (Digitized by SWCA)
- Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8311°N 83.9707°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting

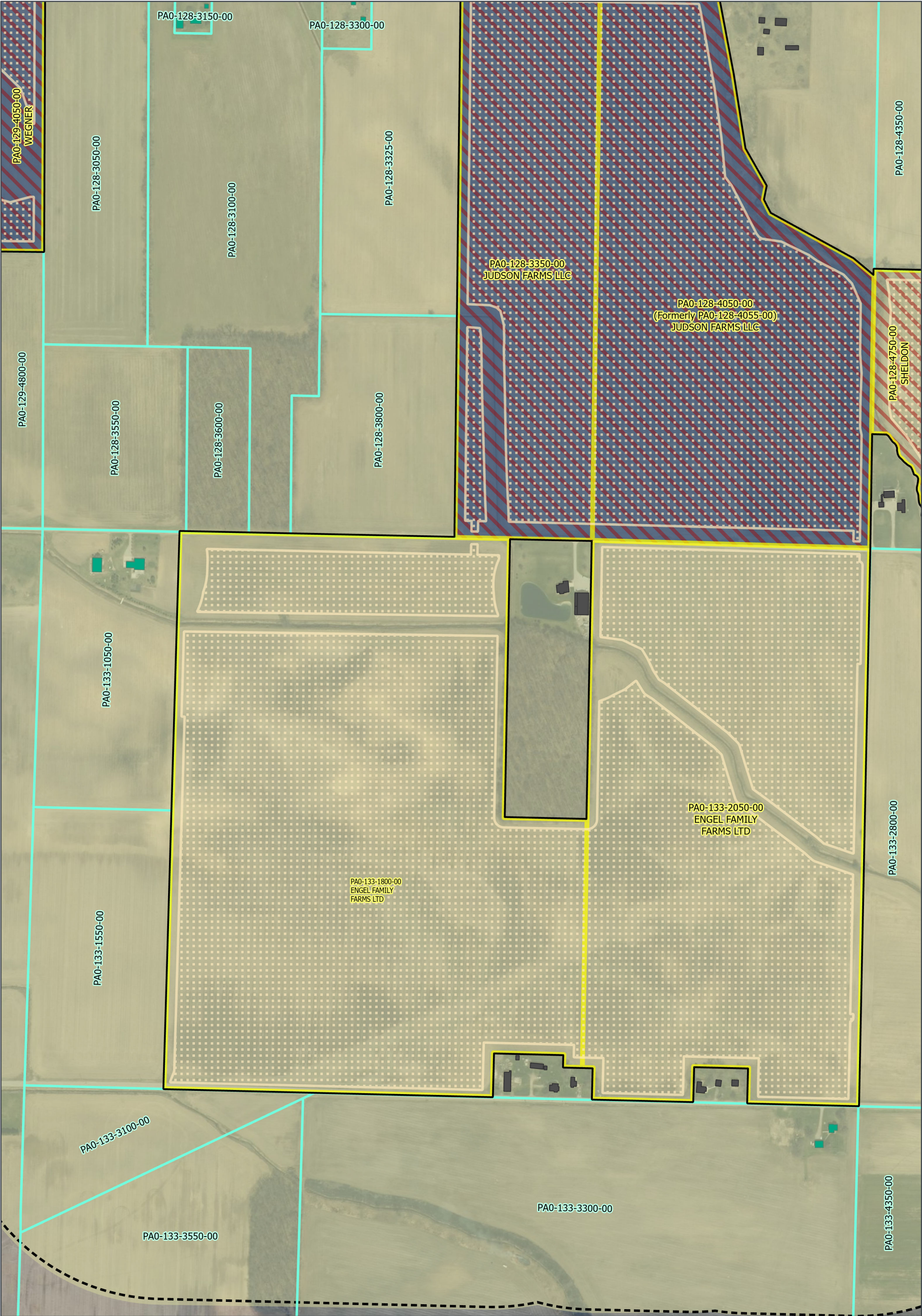
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SWCA
ENVIRONMENTAL CONSULTANTS

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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1000-Foot Project Buffer
- Collection Only Parcel
- Participating Parcels
- Adjacent Parcels

- Potentially Occupied Building on Adjacent Parcel
 - Potentially Occupied Building on Other Parcel
 - Michigan Farmland Development Rights Agreement (Formerly PA 116)
 - Farming
- Palmyra Twp Zoning (Digitized by SWCA)

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8315°N 83.9547°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting

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Feet
Meters

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1	2	3
4	5	6
7	8	9
10	11	12
	13	



ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 7
Parcel, Zoning, and PA116 Map

-  Site Plan Boundary (~1,606 acres)

 Leased Area / Project Boundary (~2,133 acres)

 1000-Foot Project Buffer

 Participating Parcels

 Potentially Occupied Building on Participating Parcel

 Adjacent Parcels
-  Potentially Occupied Building on Adjacent Parcel

 Potentially Occupied Building on Other Parcel

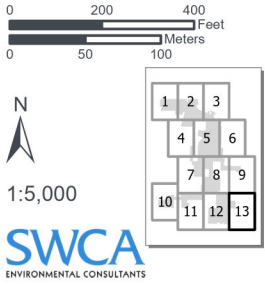
 Michigan Farmland Development Rights Agreement (Formerly PA 116)

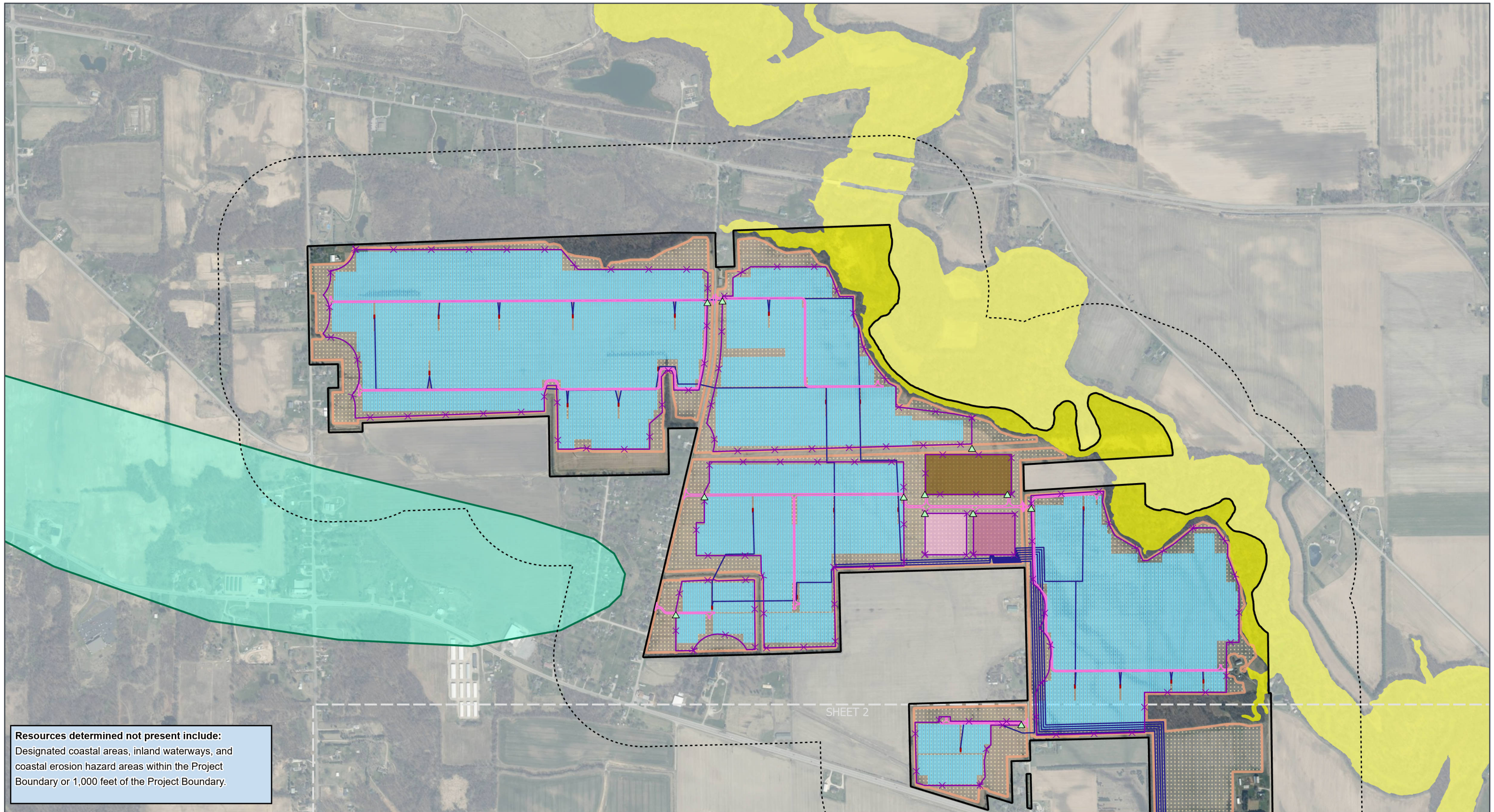
 Palmyra Twp Zoning (Digitized by SWCA)

 Farming

Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 UTM Zone 17N
41.8319°N 83.9387°W

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/25/2025
Project No. 78878
Layout: ExhibitA 1 2 fig7 parcelSeries
Aprx: 78878_Rouget_Permitting

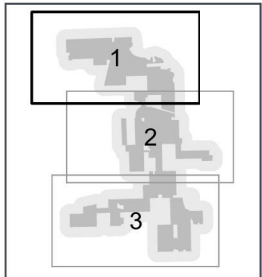




Resources determined not present include:
 Designated coastal areas, inland waterways, and coastal erosion hazard areas within the Project Boundary or 1,000 feet of the Project Boundary.

ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 8
Flood Hazard and
Wellhead Protection
Map

- | | | |
|---------------------|------------------|---|
| △ Gate | ■ Solar Panel | ■ Site Plan Boundary (~1,606 acres) |
| ✕ Fence | ▨ Laydown Area | ▭ Leased Area / Project Boundary (~2,133 acres) |
| — Access Road | ■ O&M Pad | ▭ 1,000-foot Buffer |
| — Underground Cable | ■ Substation Pad | ■ 1% Annual Chance Flood Hazard |
| ■ Inverter | ■ Switchyard Pad | ■ Type 1 Provisional Wellhead Protection Area |



Palmyra Twp,
 Lenawee County, MI
 USGS 7.5' Quadrangles:
 Tecumseh South, MI, 41083-H8
 Palmyra, MI, 41083-G8
 NAD 1983 2011 StatePlane
 Michigan South FIPS 2113 Ft
 Intl
 41.8782°N 83.9744°W

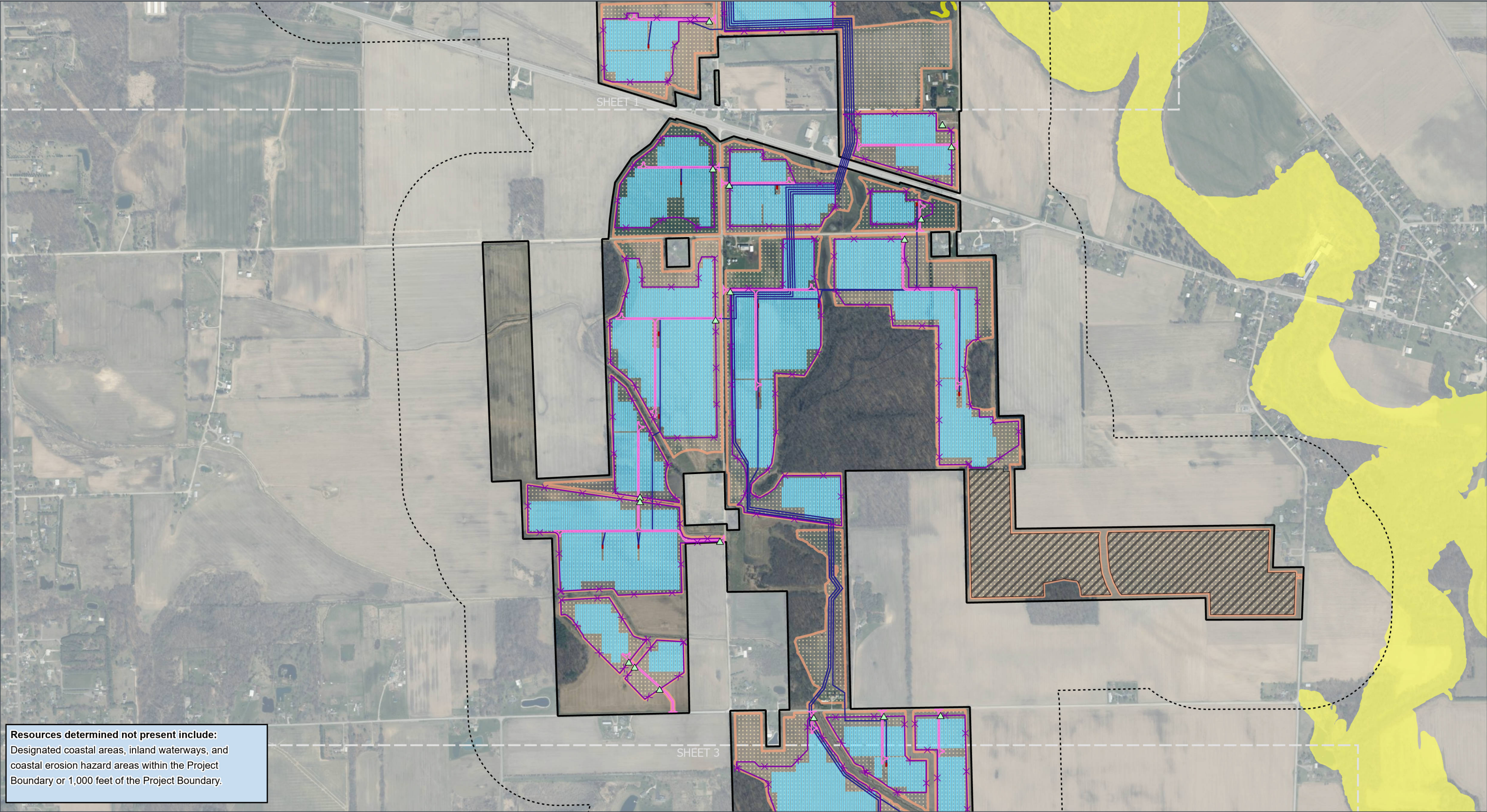
Base Map: Esri ArcGIS Online,
 accessed July 2026
 Updated: 7/21/2026
 Project No. 78878
 ExhibitA_1_2_fig8_Floodzone_Series
 Aprx: 78878_Rouget_Permitting

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 Feet
 Meters

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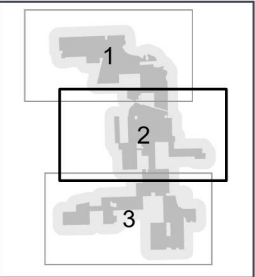
SWCA
 ENVIRONMENTAL CONSULTANTS



Resources determined not present include:
Designated coastal areas, inland waterways, and coastal erosion hazard areas within the Project Boundary or 1,000 feet of the Project Boundary.

ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 8
Flood Hazard and
Wellhead Protection
Map

- | | |
|-------------------|---|
| Gate | Laydown Area |
| Fence | Site Plan Boundary (~1,606 acres) |
| Access Road | Leased Area / Project Boundary (~2,133 acres) |
| Underground Cable | 1,000-foot Buffer |
| Inverter | 1% Annual Chance Flood Hazard |
| Solar Panel | |



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8568°N 83.962°W

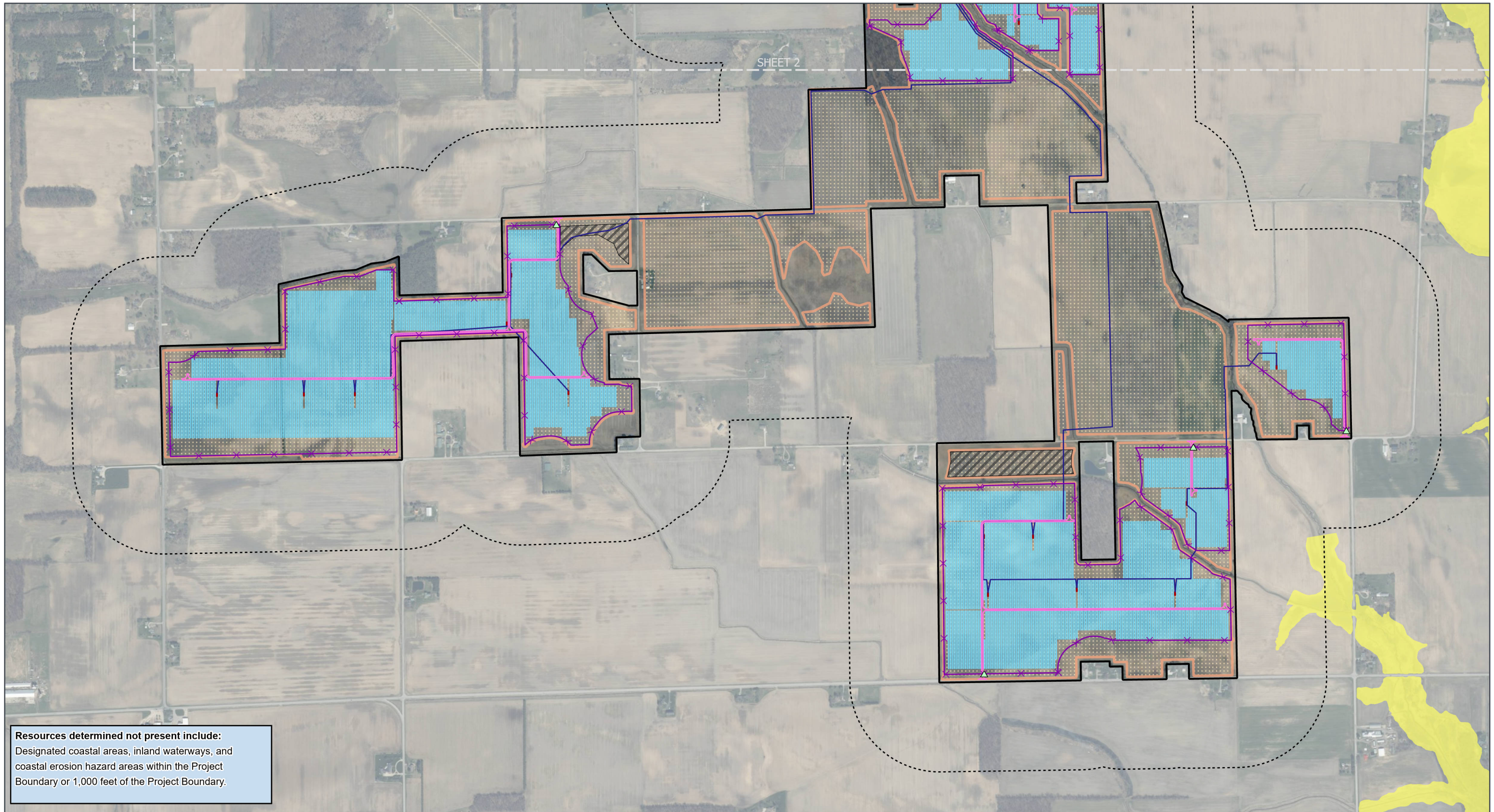
Base Map: Esri ArcGIS Online,
accessed July 2026
Updated: 7/21/2026
Project No. 78878
ExhibitA_1_2_fig8_Floodzone_Series
Aprx: 78878_Rouget_Permitting

0 500 1,000
0 125 250
Feet
Meters

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1:12,000

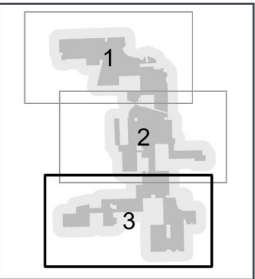
SWCA
ENVIRONMENTAL CONSULTANTS



Resources determined not present include:
Designated coastal areas, inland waterways, and coastal erosion hazard areas within the Project Boundary or 1,000 feet of the Project Boundary.

ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 8
Flood Hazard and
Wellhead Protection
Map

- | | |
|---------------------|---|
| △ Gate | ▨ Laydown Area |
| ×× Fence | ▨ Site Plan Boundary (~1,606 acres) |
| — Access Road | ▨ Leased Area / Project Boundary (~2,133 acres) |
| — Underground Cable | ▨ 1,000-foot Buffer |
| ■ Inverter | ■ 1% Annual Chance Flood Hazard |
| ■ Solar Panel | |



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8341°N 83.9674°W

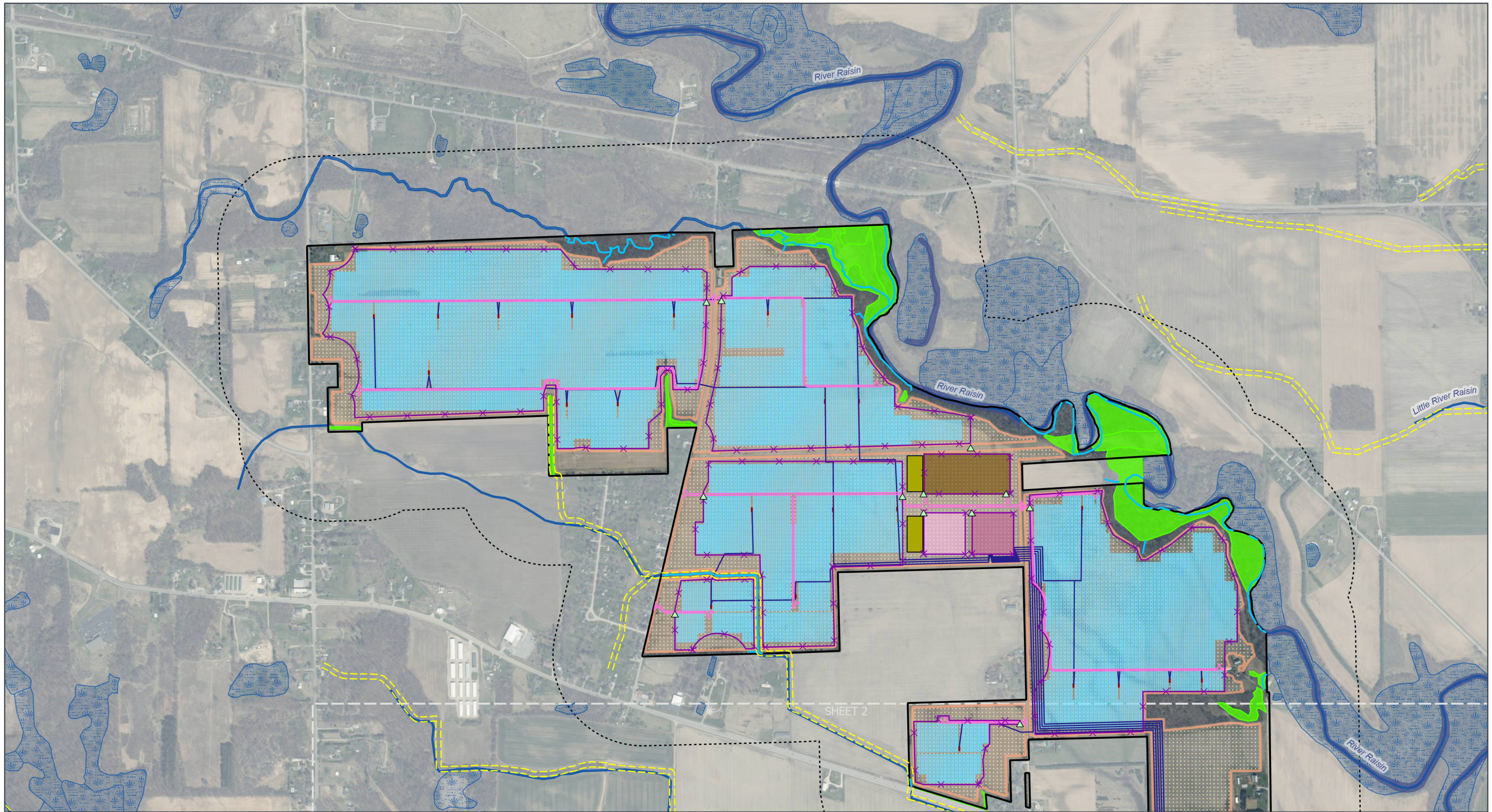
Base Map: Esri ArcGIS Online,
accessed July 2026
Updated: 7/21/2026
Project No. 78878
ExhibitA_1_2_fig8_Floodzone_Series
Aprx: 78878_Rouget_Permitting

0 500 1,000
0 125 250
Feet
Meters

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1:12,000

SWCA
ENVIRONMENTAL CONSULTANTS



ROUGET ROAD SOLAR FARM

Exhibit A-1.2
Figure 9
Water Resources Map

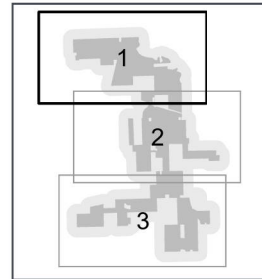
Proposed Layout

- △ Gate
- Underground Cable
- × Fence
- Access Road
- Inverter
- Detention Basin

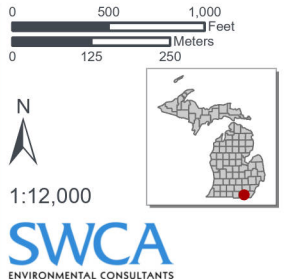
- Solar Panel
- O&M Pad
- Substation Pad
- Switchyard Pad
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- 1,000-foot Buffer

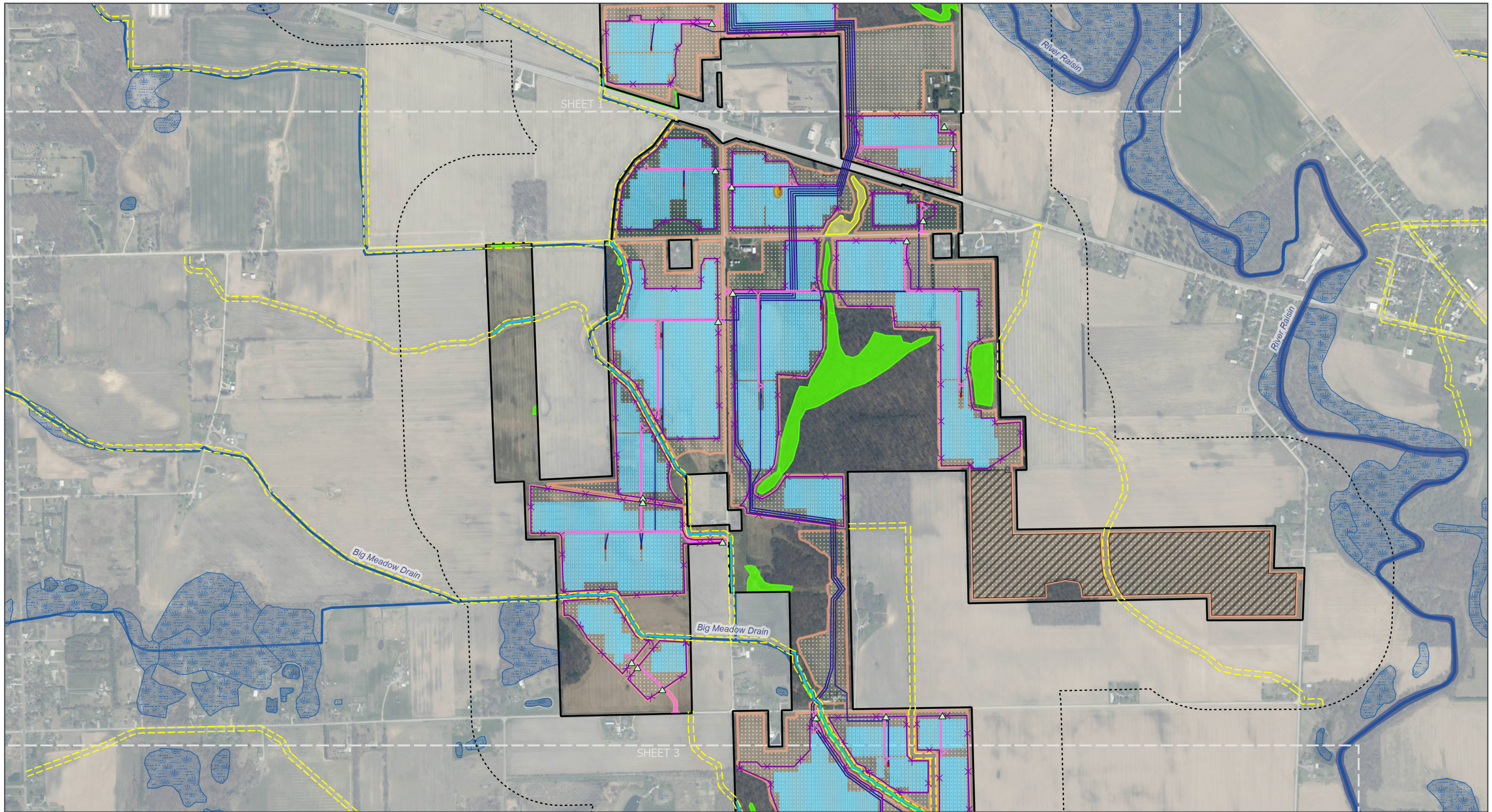
- Field Identified Watercourse (Estimated EGLE Jurisdictional)
- Field Identified Wetland (Estimated EGLE Jurisdictional)
- Field Identified Wetland (EGLE Non-Jurisdictional, Isolated)
- NHD Stream
- NHD Waterbody
- NWI Wetlands
- County Drainage

Sheet Extent



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8782°N 83.9744°W
Base Map: Esri ArcGIS Online,
accessed July 2026
Updated: 7/22/2026
Project No. 78878
ExhibitA 1_2_fig9_waters_Series
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 9
Water Resources Map

Proposed Layout

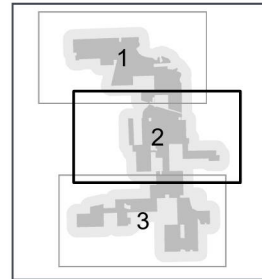
- △ Gate
- Underground Cable
- × Fence
- Access Road
- Inverter
- Detention Basin

Solar Panel

- ▨ Laydown Area
- ▨ Site Plan Boundary (~1,606 acres)
- ▭ Leased Area / Project Boundary (~2,133 acres)
- - - 1,000-foot Buffer

- Field Identified Watercourse (Estimated EGLE Jurisdictional)
- Field Identified Wetland (EGLE Jurisdiction To Be Determined)
- Field Identified Wetland (Estimated EGLE Jurisdictional)
- Field Identified Wetland (EGLE Non-Jurisdictional, Isolated)
- NHD Stream
- NHD Waterbody
- NWI Wetlands

- County Drainage
- Sheet Extent



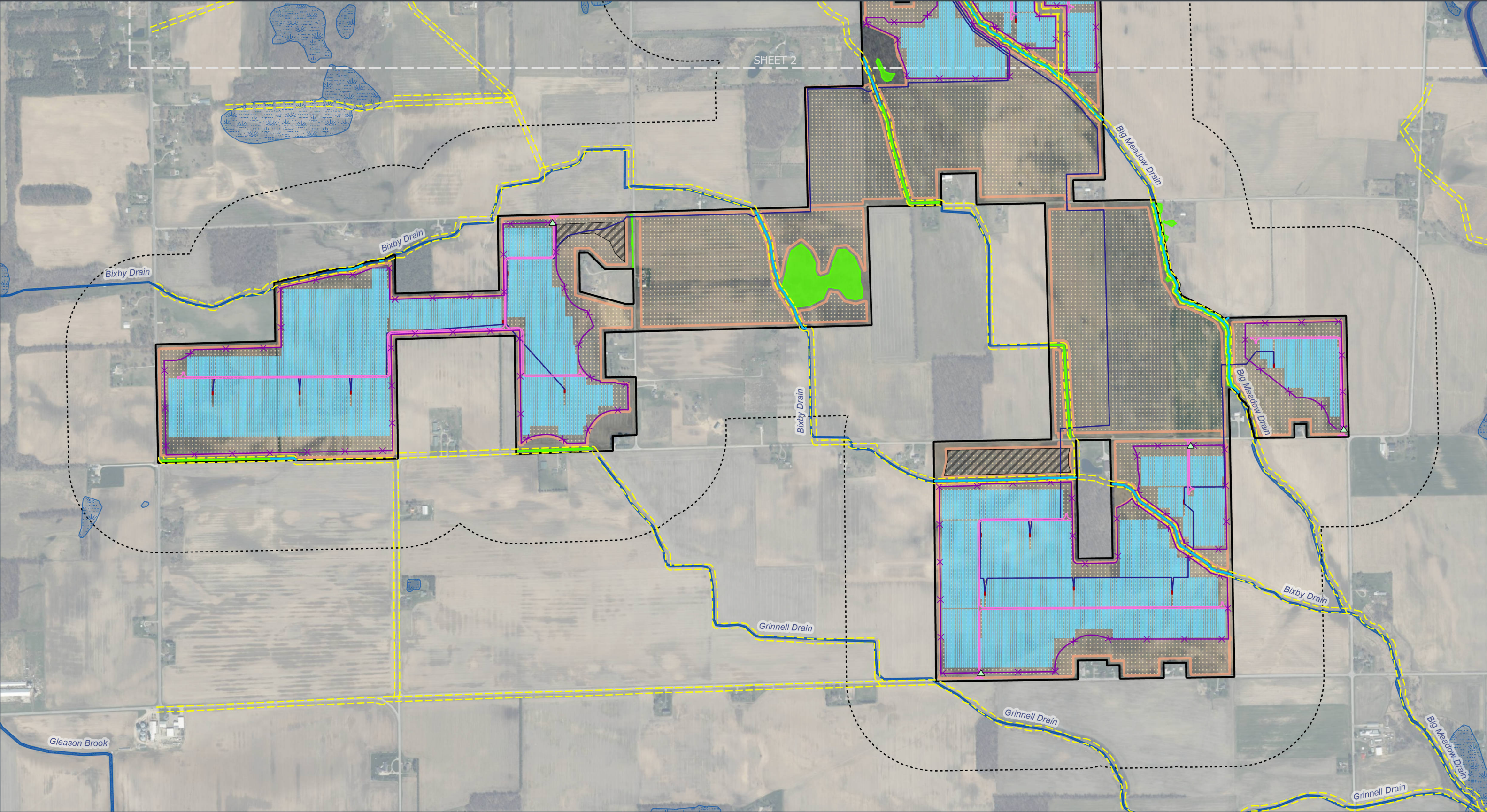
Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8568°N 83.962°W
Base Map: Esri ArcGIS Online,
accessed July 2026
Updated: 7/22/2026
Project No. 78878
ExhibitA 1_2_fig9_waters_Series
Aprx: 78878_Rouget_Permitting

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SWCA
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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 9
Water Resources Map

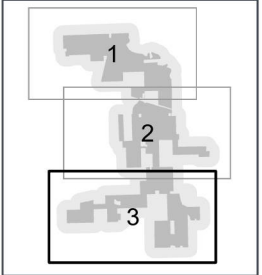
Proposed Layout

- △ Gate
- Underground Cable
- × × Fence
- Access Road
- Inverter

- Detention Basin
- Solar Panel
- ▨ Laydown Area
- Site Plan Boundary (~1,606 acres)
- Leased Area / Project Boundary (~2,133 acres)
- ⋯ 1,000-foot Buffer

- Field Identified Watercourse (Estimated EGLE Jurisdictional)
- Field Identified Wetland (Estimated EGLE Jurisdictional)
- Field Identified Wetland (EGLE Non-Jurisdictional, Isolated)
- NHD Stream
- NHD Waterbody
- NWI Wetlands
- County Drainage

Sheet Extent



Palmyra Twp,
Lenawee County, MI
USGS 7.5' Quadrangles:
Tecumseh South, MI, 41083-H8
Palmyra, MI, 41083-G8
NAD 1983 2011 StatePlane
Michigan South FIPS 2113 Ft
Intl
41.8341°N 83.9674°W

Base Map: Esri ArcGIS Online,
accessed July 2026
Updated: 7/22/2026
Project No. 78878
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Aprx: 78878_Rouget_Permitting

0 500 1,000 Feet
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SWCA
ENVIRONMENTAL CONSULTANTS

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Rouget Road Solar Farm

Exhibit A-1.3 Explanatory Information MPSC
Requirements and Associated Appendices

Lenawee County, Michigan

SEPTEMBER 2026

PREPARED FOR

Rouget Road Solar Farm, LLC
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EXHIBIT A-1.3 – EXPLANATORY INFORMATION

A-1.3.(a) – Written explanations of the elements and features shown on all provided maps as well as other planned site/facility information including a description of the project area and the portion of the community where the project will be sited including socioeconomic and demographic profiles and major industries in the area. Examples of relevant project area information include geography, topography, cities, villages, townships, counties, major industries, and landmarks.

- 1. Provide justification for how the proposed project location, layout, construction methods, etc. minimize the following:**

- i. Environmental and Natural Resource Impacts**

The Project has been thoughtfully designed to align with and protect the natural environment throughout its construction and operations and maintenance (“O&M”) phases. Rouget Road Solar Farm, LLC is committed to minimizing environmental disturbance by avoiding impacts to sensitive areas such as wetlands; streams; county drains; steep slopes; flood-prone zones; major rivers; cultural sites; and habitats for rare, threatened, and endangered (“RTE”) species to the maximum extent possible. Where applicable, the Project will implement voluntary 50-foot setbacks around wetlands and streams that are under the jurisdiction of the Michigan Department of Environment, Great Lakes, and Energy (“EGLE”) and U.S. Environmental Protection Agency (“USEPA”)/U.S. Army Corps of Engineers (“USACE”) (see **Appendix II Exhibit A-1.1**). Any unforeseen impacts to these resources identified during development will be addressed in accordance with all applicable regulations and EGLE approvals. One major consideration while developing the Project is its proximity to the River Raisin, which runs along the eastern side of the broader project area. Due to the geotechnical complexity and permitting challenges associated with an approximate 80-foot river crossing, the potential impacts to federal and/or state listed mussel species, and the geographic distribution of willing landowners, the final footprint was consolidated entirely on the west side of the river.

The Project is not expected to affect local water quality or water supply. Post-construction stormwater runoff will not materially exceed pre-construction levels. To protect nearby natural features, the Project will incorporate stormwater detention measures during and, if necessary, after construction. These measures will help prevent impacts to groundwater and surface drainage systems.

To further safeguard soil and water quality, the Project will implement a Soil Erosion and Sedimentation Control Plan and follow best management practices during both construction and operation. Compliance with county-level erosion control requirements and the EGLE-issued Notice of Coverage under the National Pollutant Discharge Elimination System permit will be maintained. Water use will primarily occur during construction for dust suppression and vegetation management. The Project does not anticipate continuous water use from local wells. If a private well becomes necessary, the Project will coordinate with the appropriate local authorities to obtain all required permits and approvals.

Comprehensive desktop and field investigations were conducted in June 2023, November 2024, March 2025, and July 2025 to identify and assess wetlands, streams, floodplains, and other water resources as well as complete a habitat assessment. These assessments followed Michigan’s Natural Resources and Environmental Protection Act (1994 PA 451, as amended). The Project will not impact jurisdictional floodplains. No direct impacts to regulated wetlands, streams, or county drains are proposed. One wetland was identified as non-jurisdictional by EGLE and will be impacted for installation of solar panels. Collection

lines will be bored underneath regulated features and may not require an EGLE permit if the bore hole is less than 6 inches in diameter. If the bore hole under EGLE regulated wetlands and waterbodies will be greater than 6 inches in diameter, then either a general or minor EGLE permit will be required and obtained. However, if impacts to regulated features are proposed, such as an access road crossing of a stream, wetland, or county drain, then EGLE permits (general or minor) under Parts 303, 301, and/or 31 of 1994 PA 451 would be obtained as necessary.

SWCA conducted assessments concurrently with the water resources field work to evaluate the presence of federally and state-listed RTE species and their habitats, in compliance with the following regulations:

- Endangered Species Act of 1973 (“ESA”), Section 7 and Section 9
- Federally proposed species, candidate species, and species of concern
- Michigan’s Endangered Species Act (Part 365 of 1994 PA 451)
- Michigan Fisheries Order 224.17 (reptiles and amphibians)
- Bald and Golden Eagle Protection Act
- Migratory Bird Treaty Act
- Birds of Conservation Concern (“BCC”) as identified by USFWS (2021)

Prior to fieldwork, SWCA generated a resources list using the U.S. Fish and Wildlife Service Information for Planning and Consultation online tool and reviewed Michigan Natural Features Inventory records within 1.5 miles of the Project Area. Based on desktop and field assessments, the Project Area comprised primarily of active agricultural land—has a low potential to contain RTE species habitat. Nonetheless, conservation measures such as seasonal clearing of the 7.96 acres of noncontiguous hedgerows of trees will be implemented to avoid potential impacts to species. Consultation with the Michigan Department of Natural Resources regarding RTE species is ongoing.

As the Project is a solar energy system, it will generate electricity without producing pollutant emissions such as smoke, fumes, or odors. Solar panels convert sunlight into electricity using materials such as crystalline silicon, cadmium telluride (“CdTe”), or copper indium gallium selenide (“CIGS”). These materials are encapsulated in layers of glass and aluminum, making them safe to handle and operate. Crystalline silicon is a naturally occurring mineral, while cadmium and tellurium are byproducts of zinc and copper mining. CIGS panels use indium, a rare mineral typically extracted from zinc sulfide ores.

Only Tier 1 equipment suppliers will be used for the Project. Solar panels are expected to pass the U.S. Environmental Protection Agency’s Toxicity Characteristic Leaching Procedure test, which ensures that broken panels do not leach hazardous substances at levels harmful to human health or the environment. Panels that pass this test are classified as non-hazardous and may be disposed of in standard landfills. However, the Applicant is committed to recycling or salvaging panels whenever possible, including those damaged during construction or decommissioning.

As a result, the Project will not pose a hazard to surrounding land uses or produce hazardous byproducts. At the end of its operational life, the Project will be decommissioned, and the land will be restored to its original use.

See also **Appendix I, Exhibit 2**, Direct Testimony of Carol Mcknight (“C. Mcknight”), at pp. 7-8.

ii. Noise

The Project is not expected to generate noticeable sound impacts at nearby residences. It has been specifically designed to minimize operational noise by centrally locating primary sound-generating equipment, such as inverters, away from the Project boundary edge wherever feasible.

As detailed in the Noise Technical Report, the applicable operational sound limit is 55 dBA average hourly level at the nearest outer wall of the nearest dwelling on an adjacent non-participating property. This criterion is required by Michigan Public Act 233 (MCL 460.1226(2)(b)) and is implemented through the MPSC Act 233 filing requirements (see **Appendix II, Exhibit A-1.7**). Predictive modeling, using ANSI-recognized methods and conservative operating assumptions, confirms that the Project meets the 55 dBA L_{eq} (1-hour) limit at all non-participating residences.

Local review identified no county-level standard specific to solar in Lenawee County. Palmyra Township Ordinance 25-04 specifies a 55 dBA L_{eq} (1-hour) limit at the nearest non-participating dwelling, which is consistent with the State requirement. Local references were considered for consistency, and compliance is demonstrated under the governing State standard. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 3 and 17.

iii. Visual Impacts

SWCA conducted a desktop visual assessment using the Bureau of Land Management's Visual Resource Management system to evaluate potential visual impacts within a 1-mile radius of the Project (**Appendix II Exhibit A-1.3, Appendix A: Visual Resource Desktop Assessment**).

To comply with Palmyra Township's Zoning Ordinance #11-2020 (as amended in 07/25/2023), the layout of the Project has been optimized to use available land and still provide environmental and visual setbacks to achieve a minimal impact to natural resources and adjacent residents' viewshed. Areas disturbed by construction (temporary laydown areas) will be restored and stabilized per the vegetation management plan (**Appendix II Exhibit A-1.1**) and all temporary construction equipment or features will be removed and restored as necessary. Restrictions of vehicle speeds, dust abatement measures and watering active construction areas will also reduce visual impacts during construction. Planned screening (discussed in **Appendix II Exhibit A-1.1 and Exhibit A-1.3, Appendix A: Visual Resources Desktop Assessment**) would consist of regionally native species that would mature (within 10 years). Selected trees would be approximately 10 to 12 feet in height, and selected shrubs will be between 6 to 8 feet in height. This type of screening in the landscape would help reduce but not erase visual impacts to viewers.

Palmyra Townships Zoning Ordinance #11-2020 also includes the following policies relevant to visual resources:

- Section C Application for Site Plan Review for Level 3 SES, item 6. Description of the screening to be provided for the ground or wall mounted solar energy equipment.
 - The Applicant provides this information in **Appendix II Exhibit A-1.1 Vegetation Management and Landscape Plan**.
- Section C Application for Site Plan Review for Level 3 SES, item 9. Visual inspections: Review and demonstrate the visual impact using photos or renderings

of the project or similar projects with consideration given to tree plantings and setback requirements.

- The Applicant provided generalized renderings/examples of screening projects similar to Rouget Road for the public meeting (See **Appendix II Exhibit A-4.2**).
- Section D. Level 3 Solar Farms, item 3. Height Restrictions: All panels located in a solar farm shall be restricted to a height of fourteen (14) feet when oriented at maximum tilt.
 - The Applicant currently anticipates solar panel components will be 10 feet above ground when the arrays are at full tilt and therefore, the Project will meet the Palmyra ordinance. However, the solar panels will not exceed a maximum height of 14 feet above ground when the arrays are at full tilt. Additionally, the solar panels have an anti-glare coating to minimize glare during various tilt positions.

The Project will introduce new visual elements into the landscape, which is predominantly agricultural with scattered wooded areas comprised of evergreen and deciduous trees. While the solar modules will be visible and individually distinguishable from adjacent roadways and properties, they will be installed on portions of cultivated farmland that are already open to view. Their repeating, horizontal layout will mimic the uniformity of traditional row crops. Additionally, solar panels have an anti-glare coating to minimize glare during various tilt positions.

To enhance visual appeal and ecological value, the area within the Project's fence line will be planted with a native pollinator seed mix. This vegetation will not only support pollinator habitats but also contribute to the Site's aesthetic. The selected species are expected to bloom from April through November, providing seasonal color and texture.

To help preserve the area's agricultural character and visual integrity, the Project will incorporate design elements such as setbacks, perimeter fencing, vegetative buffers, and pollinator-friendly landscaping. To mitigate potential visual impacts of the Project, the Applicant intends to collaborate with adjacent non-participating landowners within 0.25 mile to develop vegetative screening with native species. When feasible, existing vegetation located within and outside of the Project Area will be accounted and utilized for such screening. Additionally, the Project has minimized the removal of existing woodlands and noncontiguous hedgerows to 7.96 acres of tree removal. Significant areas of existing woodlands (approximately 200 acres) will be preserved within the Project boundary, further mitigating visual impacts by blocking views of the Project from certain areas and breaking up expansive views of solar modules.

Direct views of the Project infrastructure from nearby residences would be limited due to setbacks and existing vegetation. Refer to the Site Plan in **Appendix II Exhibit A-1.1** and Visual Resources Desktop Assessment and Glint Glare Assessment in **Appendix II Exhibit A-1.3, Appendix A**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 8-9.

iv. Impacts to Traffic

Construction of the Project will result in a minor, temporary increase in local traffic. This impact, however, will be short-term, and appropriate safety measures will be implemented to maintain traffic safety throughout the construction period. Once operational, the Project

is not expected to generate additional vehicular traffic, as routine O&M activities will typically involve only two to five staff members per week.

The existing road network has sufficient capacity to safely and efficiently handle the traffic associated with the Project. Construction activities will utilize current street and highway infrastructure, and no new public roads are planned. All solar facility components will be set back from public road rights-of-way. Rouget Road Solar Farm is committed to minimizing disruption by avoiding the use of public roads during designated school bus hours.

Transportation and installation of Project components are not anticipated to require modifications to existing infrastructure. More details are provided in the Traffic Plan in **Appendix II Exhibit A-1.3, Appendix B** and the Proposed Haul Route Plan in **Appendix II Exhibit A-1.1**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 9.

Rouget Road Solar Farm is actively coordinating with the Lenawee County Road Department and the Michigan Department of Transportation regarding workforce logistics, delivery routes, access road design standards, and permitting requirements. The Applicant will secure all necessary approvals and permits. Access roads have been designed to ensure safe entry and exit for maintenance personnel and emergency vehicles without increasing runoff to existing drainage systems.

v. Impacts to Solid Waste Disposal Capacity

Waste generated throughout the Project's life cycle including both construction and O&M phases, will be managed and disposed of in full compliance with applicable environmental regulations. During construction, waste and hazardous materials will be collected and stored in appropriate containers within designated laydown areas. During the O&M phase, these materials will be stored at the proposed on-site O&M building prior to disposal.

Non-recyclable waste will be transported to a licensed landfill facility, while recyclable materials such as metals, glass, plastics, and paper products will be delivered to certified recycling centers. The Project will also use public solid waste management or municipal waste disposal services at the O&M building.

Any debris or waste produced during construction will be removed from the Site and taken to approved waste disposal facilities. The Solid Waste Plan is provided in **Appendix II Exhibit A-1.3, Appendix C**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 9.

vi. Impacts to County and Intercounty Drains and Preliminary Plans to Minimize, Mitigate, and Repair Drainage Issues

Rouget Road Solar Farm consulted with the Lenawee County Drain Commissioner ("LCDC") on April 8, 2025, to determine the locations of existing county drains and associated easements and drain tile mapping located within the Project Area. There are six county drains located within the Project Area/leased boundary. The Applicant does not propose road construction over county drains but does plan on boring, at a minimum of 4 feet below channel, under necessary streams and county drains. Aboveground infrastructure will adhere to the 50-foot setback from any county drain easement. A crossing permit will be obtained from the LCDC for any crossings of county drains for collection lines. The Site Plan provided in **Appendix II Exhibit A-1.1** illustrates the locations of existing private drains, county drains, and easements and their relation to the Project. The Minimize, Mitigate, and Repair Plan ("MMR") in **Appendix II A-6.4** includes a summary of measures implemented to minimize and avoid stormwater impacts. Additionally, this plan describes

Rouget Road Solar Farm's plan for mitigation in the event of damages during construction. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 8-9, 13.

In addition, Rouget Road Solar Farm has consulted with the LCDC and has determined that the current stormwater rules were created for housing and commercial development rather than solar energy systems. Temporary stormwater basins may be required during construction of the Project. Post-construction stormwater basins within the solar panel arrays and vegetated areas may not be required if the Project can demonstrate a decrease in current runoff. Post-construction detention basins would be required for areas with increased impervious area such as the substation, switchyard, and O&M areas. The Project has implemented a preliminary stormwater plan designed to satisfy the requirements of the LCDC. The size and locations of stormwater basins are subject to LCDC final review and are subject to change. The Site Plan in **Appendix II Exhibit A-1.1** illustrates the locations of proposed measures.

The Project will primarily convert areas of agricultural crop (~1,567 acres) development into solar energy development with grassed/herbaceous ground cover, elevated solar panels, and gravel driveways to site equipment. Due to land availability, there will also be some areas of forest (~7.96 acres) and pasture/meadow (~31 acres) land cover that will be repurposed for solar facilities. Typical preparation for installation of solar facilities consists of clearing vegetation with minor grading as needed to allow driving of panel support posts into the ground. Generally, site grading is avoided or minimized but may be necessary due to topographical constraints (i.e., steep slopes and/or ridges/valleys within the tracker rows) to comply with tracker vendor requirements. These grading areas are localized and will not alter the existing drainage patterns to divert large areas away from their existing downstream drainage basins. The proposed Project's excavation and stormwater management measures are designed to prevent increased surface drainage and minimize runoff to adjacent properties.

vii. Other Impacts to Non-Participating Property Owners During Construction and Operation

The Project is designed and will be constructed, operated, and maintained to prevent adverse effects on neighboring lands. In addition to the responses above, the Project is designed to include a security fence surrounding the Project and all access points. Fencing for the solar energy facility will be wildlife friendly and will be designed and installed to comply with the most recent version of the National Electric Code ("NEC") in effect as of November 29, 2024, or any applicable successor standard adopted by the MPSC.

The Project complies with all Federal Energy Regulatory Commission interconnection standards. All components of the Project have also been designed to comply with the National Electric Safety Code and/or Institute of Electrical and Electronics Engineers standards or guidelines. Consultation with the Palmyra Fire Department, Lenawee County Emergency Management, and Lenawee County Sheriff's Office is ongoing to discuss the Project layout, ensure that access roads are designed adequately for service, and share the Project's Emergency Response Plan ("ERP") and Fire Response Plan ("FRP"). In addition, Rouget Road Solar Farm will notify the Palmyra Fire Department and Lenawee County Emergency Management prior to construction to schedule a Project visit during construction to obtain an on-the-ground understanding of the Project layout and access points, as well as protocols in place. During this visit, Rouget Road Solar Farm will provide training to the Palmyra Fire Department and Lenawee County Emergency Management regarding the Project's ERP and FRP.

A glare hazard analysis (see **Appendix II Exhibit A-1.3, Appendix A**) did not predict any instances of red glare, which is considered to be extremely impactful when reflected on any residences, businesses, or vehicular travelers on roads.

A socioeconomic and environmental justice assessment was completed (**Appendix II Exhibit A-1.3, Appendix D**). After considering all potential Project impacts, the Applicant identified no instances where communities of EJ concern were 1) likely to be more sensitive to a given level of Project exposure; 2) likely to be disproportionately exposed due to lifestyle approaches; or 3) likely to be prevented from taking mitigating actions that general members of the public might readily adopt. This conclusion stems largely from the observation that the Project's potentially adverse impacts are primarily related to 1) air emissions, noise emissions, and dust generation during construction and 2) long-term viewshed alteration. The impacts of these changes tend to be most acute near a project site and dissipate through space.

Overall, the Project is designed to protect the health, safety, welfare, social well-being, and economic well-being of those using the land, nearby residents, landowners adjacent to the Project, and the community.

For more information, see also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 9-10.

2. Provide the number of acres of the proposed site for the facility.

The Project boundary/leased area is approximately 2,133 acres. Approximately 1,606 acres will be disturbed as part of Site facility, of which approximately 1,042 acres will be fenced in, as indicated in the Participating Parcel List in **Appendix II Exhibit A-1.15** and the Site Plan in **Appendix II Exhibit A-1.1**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 5.

3. Provide written descriptions explaining the relation of the location of the facility site, and all ancillary features not located on the facility site, to the ALUs of government.

The Project is located approximately 2.5 miles southeast of the city of Adrian. All features are located within Palmyra Township, Lenawee County, consistent with local land use (see Figure 1, Municipal Boundaries Map, and Figure 2, Site Location Map, in **Appendix II Exhibit A-1.2**). See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 5.

Lenawee County

Lenawee County, which includes both the city of Adrian and Palmyra Township, has a total population of around 97,500. The county population is largely White (85%). The median age is 43.5 years, reflecting a balanced mix of working-age adults and retirees. Economically, the county is middle-income, with a median household income of \$63,952 and a poverty rate just under 10%. Educational levels are similar to the state average, with about 91% of adults having completed high school and 22% holding a bachelor's degree or higher. Housing is relatively stable, with a median home value of \$181,100 and a high rate of homeownership (around 79%). Commuting is common, with an average travel time of 27.3 minutes.

Palmyra Township

Palmyra Township is a rural community with a population of about 2,150 people. It has an older demographic, with a median age of 46.2 years, and is predominantly White (96%). The township is more affluent than Adrian, with a median household income of \$84,643 and a relatively low poverty rate of 9.1%. Most households are family-based, with a high

percentage of married couples and an average household size of 2.5. Homeownership is strong, with nearly 79% of homes being owner-occupied and a median home value of \$197,810. Residents typically commute to work, with an average travel time of 23.8 minutes, and the vast majority drive alone.

Palmyra Township is historically and economically rooted in agriculture, with large portions of land dedicated to farming and crop production. The township maintains a rural character, and agriculture remains the dominant industry, supported by a small but stable population and a low unemployment rate.

City of Adrian

Adrian is a small city with a population of approximately 20,500 residents. The community is relatively young, with a median age of 35.9 years. It is racially diverse compared to surrounding areas, with about 71% of the population identifying as White, 21% as Hispanic or Latino, and smaller percentages identifying as Black or multiracial. The city faces economic challenges, with a median household income of around \$42,851 and a poverty rate of 23.7%, which is significantly higher than the state average. Educational attainment is moderate, with nearly 89% of residents holding at least a high school diploma and about 22% having a bachelor's degree or higher. Housing is relatively affordable, with a median home value of \$119,900, and just over half of the homes are owner-occupied.

In the broader Lenawee County, manufacturing is the largest industry, employing over 8,900 of the county's 44,000 workers. The county is home to several long-standing manufacturers, including Adrian Steel, a leader in vehicle upfitting, and Merillat Cabinets, a pioneer in kitchen cabinetry. These companies have contributed significantly to the local economy and community development. The manufacturing sector continues to grow, with expansions in advanced materials and electric vehicle ("EV") battery components, such as the recent investment by Daejin Advanced Materials USA.

- 4. Provide a qualitative assessment of the compatibility of the facility, including any off-site staging and storage areas, with existing, proposed and allowed land uses located within a 1,000-foot perimeter of the facility site. The assessment shall identify the nearby land uses of and shall address the land use impacts of the facility on residential areas, schools, civic facilities, recreational facilities, and commercial areas. The assessment and evaluation shall demonstrate that conflicts from facility-generated noise, traffic, and visual impacts with current and planned uses have been minimized to the extent practicable.**

The Project has been thoughtfully designed, and will be constructed, operated, and maintained, to ensure compatibility with existing land uses within a 1,000-foot perimeter. A qualitative assessment of surrounding land uses confirms that the Project aligns with current uses and will not result in adverse impacts (see Figure 1, Municipal Boundaries Map; Figure 3, Existing Land Use Map; and Figure 7, Parcel, Zoning, and PA116 Map, in **Appendix II Exhibit A-1.2**).

The surrounding area includes agricultural land, small businesses, and residential properties. No schools, civic institutions, or recreational facilities are located within the 1,000-foot buffer. The Project Site falls within the Farming or Residential and Farming zoning districts in Palmyra Township.

To minimize potential impacts on non-participating properties, the Project incorporates sound mitigation strategies, setbacks, and vegetative buffers to reduce noise and visual disturbances. As noted previously, Project design has incorporated and adheres to Palmyra Township's existing zoning ordinances (Ordinance #11-2020). Additionally, the facility's

operations will not increase traffic or disrupt nearby community or civic functions. Construction-related traffic will be managed through a traffic control plan, and operational traffic will remain minimal post-construction, ensuring compatibility with local infrastructure.

Efforts have been made to preserve surrounding woodlots and farmland wherever possible. Portions of the Project Area outside the active operational footprint may remain available for continued agricultural use. Stormwater management measures will be implemented to prevent increased runoff and protect neighboring properties, maintaining the area's surface drainage patterns.

Overall, the Project is designed to complement the surrounding land uses, preserve the region's low-density rural character, and safeguard the health, safety, and welfare of nearby residents and stakeholders.

See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 5-7.

5. **Provide a description of the planned screening, landscaping, and vegetative cover. For solar developments, describe the plan to establish and maintain pollinator habitat and vegetative ground cover for the life of the proposed facility. This information is not required if the proposed facility is located entirely on brownfield land**

The Project includes a robust landscaping and vegetative cover plan designed to support ecological function and visual screening. Existing vegetation, such as forested areas, have been preserved to the greatest extent possible. Where existing vegetation is insufficient, the Project will implement native vegetative screening using native trees and shrubs. These plantings are spaced to provide effective visual buffers and habitat value. The locations of vegetative screening for the Project are provided on Sheets 20 through 25 of the Site Plan located in **Appendix II Exhibit A-1.1**. see also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 8-9, 11, 15.

The Project will also establish a robust ground cover of native grasses and pollinator plants to absorb precipitation, provide species habitat, minimize the need for herbicides, and filter stormwater to reduce the potential for erosion and sedimentation. This approach will help to facilitate the long-term health of the soil. To establish and maintain pollinator habitat, seed mixes have been developed for the solar array area, perimeter lease area, and stormwater basins comprised of a diverse mix of native grasses and wildflowers. The seed mixes are designed to support pollinators throughout their life cycles and promote long-term soil health and biodiversity. To the extent practicable, and as is described in subparagraph (i) below, vegetation for the Site will seek to achieve "meets pollinator standards" criteria set forth in the "Michigan Pollinator Habitat Planning Scorecard for Solar Sites." Seeding will follow a structured schedule, with dormant seeding (November 15–May 15) as the preferred window. Broadcast seeding is the primary method, with strict calibration and documentation requirements to ensure proper application. As part of the Project decommissioning, current farmland will be returned to a condition capable of productive agricultural use.

Maintenance will include erosion control measures, reseeding as needed, and ongoing monitoring to ensure the success and longevity of the pollinator habitat and vegetative ground cover throughout the life of the facility. The Proposed Seeding Plan is included with the Site Plan in **Appendix II Exhibit A-1.1**.

- i. **Describe the plan to meet or exceed pollinator standards throughout the lifetime of the proposed facility as established by the "Michigan Pollinator Habitat Planning Scorecard for Solar Sites" developed by the Michigan State**

University Department of Entomology in effect on February 27, 2024, or any applicable successor standards approved by the Commission.

The Project is designed to meet or exceed the standards outlined in the “Michigan Pollinator Habitat Planning Scorecard for Solar Sites.” Sheet 26: Seeding Schedule, of the included Site Plan (**Appendix II Exhibit A-1.1**), includes a copy of the completed scorecard identifying how the project meets the scorecard requirements with a total score of 88 points. Further, sheet 26 (**Appendix II Exhibit A-1.1**), provides key characteristics of the proposed seed mixes, and sheet 27: Seeding Notes (**Appendix II Exhibit A-1.1**), includes guidance for the proper installation and long-term maintenance of the seeded areas. Key elements include the following:

- Use of a diverse mix of native, pollinator-supportive plant species indorsed by the MSU Department of Entomology.
- Selection of species with staggered bloom periods to provide continuous forage.
- Implementation of proper seeding techniques and timing to ensure establishment.
- Long-term maintenance plans including monitoring, reseeding, and invasive species control.
- Avoidance of harmful chemical inputs.

All seed sourcing, calibration, and application documentation will be retained and submitted to ensure transparency and compliance with the Scorecard’s criteria.

ii. Explain how the seed mix used to establish pollinator plantings shall not include invasive species as identified by the Midwest Invasive Species Information Network, led by researchers at the Michigan State University Department of Entomology and supporting regional partners

The seed mix used for the Project has been carefully vetted to ensure that it does not include any invasive species listed by the Midwest Invasive Species Information Network. All seeds will be certified and sourced from reputable suppliers. Contractors are required to retain and submit original seed tags and documentation of application locations. Prior to installation, the Project team will cross-reference all species on the physical seed tags against the Midwest Invasive Species Information Network database to ensure full compliance and prevent the introduction of invasive species. Further, sheet 27: Seeding Notes, of the Site Plan (**Appendix II Exhibit A-1.1**), includes guidance for managing invasive species through the establishment and long-term maintenance periods. Proposed seed mixes include a diverse mix of grasses and forbs that, once established, will support the suppression of undesirable species. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 9, 11, 15.

6. Provide a written description of how planned fencing complies with the version of the National Electric Code in effect on November 29, 2024, or as approved by the Commission.

The Project will be enclosed by perimeter security fencing designed in accordance with NEC requirements. This fencing will fully surround the Project Site to prevent unauthorized access, as mandated by federal regulations. To ensure compatibility with the surrounding agricultural landscape, the fencing will be wildlife friendly to allow for small wildlife movement as well as be designed and installed to comply with the most recent version of the NEC in effect as of November 29, 2024, or any applicable successor standard adopted

by the MPSC. This design maintains a rural aesthetic while providing the necessary security. The Project will comply with the NEC Article 250 requirements for grounding and bonding for the security fence to be installed around the substation, switchyard, and O&M buildings. Effective ground-fault current path, essential for the safe operation of circuit breakers and ground-fault detectors, is created by proper grounding and bonding. The NEC specifies various grounding electrode options including ground rods, metal water pipes, and concrete-encased electrodes. The Project will utilize 3/4" x 10' ground rods mechanically bonded to each fence gate. The Project will also have 4/0 copper ground rings and [4] ground rods at inverters, as well as electrode grounding conductors ("EGC") throughout the site (#2 AWG copper equivalent). All metal equipment will be mechanically bonded to an EGC via multiple methods, such as: UL 467 listed brackets at tracker piles, #2 AWG equivalent messenger wires, irreversible mechanical crimps, and #2 AWG copper conductors which will run in DC trenches and terminate at the inverter station grounding terminal. The Applicant will employ these options across the Project as appropriate to ensure proper grounding and bonding, each option being consistent with NEC specified measures to achieve required electrode grounding. Proper grounding and bonding prevent electrical shocks, equipment damage, and fire hazards.

Typical details of the fencing design can be found in the Security Details section of the Site Plan, located in **Appendix II Exhibit A-1.1**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19-20.

APPENDIX A
VISUAL RESOURCES DESKTOP
EVALUATION



Visual Resources Desktop Assessment for the Rouget Road Solar Energy Project, Lenawee County, Michigan

SEPTEMBER 2026

PREPARED FOR

Rouget Road Solar Farm, LLC

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PREPARED BY

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VISUAL RESOURCES DESKTOP ASSESSMENT FOR THE ROUGET ROAD SOLAR ENERGY PROJECT, LENAWEE COUNTY, MICHIGAN

Prepared for

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SWCA Project No. 78878

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1 INTRODUCTION

Rouget Road Solar Farm, LLC, a wholly owned subsidiary of RWE Clean Energy LLC (“Applicant”), is proposing to develop the Rouget Road Solar Project (Project). The Project is a proposed 175-megawatt (“MW”) alternating current (“AC”) solar photovoltaic (“PV”) power generating facility. The Project would be in Lenawee County, Michigan, near the city of Adrian. The Project Boundary/Leased Parcels is approximately 2,133 acres of predominantly agricultural land. Once built, the fenced-in portion of the Project would be approximately 1,0642 acres. The Project would provide renewable energy to the electrical transmission grid. Major components of the Project include PV solar arrays (the main Project footprint), an on-site substation, switchyard, an operation and maintenance area, transmission line, roads, and fences.

This Project will require conformance with Michigan Public Service Commission (“MPSC”) guidelines concerning visual impacts from the development of solar facilities. MPSC guidance regarding visual impacts resulting from solar projects is limited; however, SWCA Environmental Consultants (“SWCA”) has prepared this assessment based on the issues typically identified for visual resources, consisting of three components: 1) existing landscape character; 2) sensitive viewing locations, referred to as key observation points (“KOPs”); and 3) the proposed Project’s degree of visual contrast to the existing landscape and KOPs. SWCA conducted an inventory of these components within the study area, defined as the area within 1 mile of the proposed Project, in accordance with MPSC guidelines for solar energy facilities (MPSC 2024).

2 REGULATORY FRAMEWORK

The Project would be located entirely on private land; therefore, no federal or state visual resource or impact management regulations and requirements apply to the Project. The MPSC has provided limited direction regarding impact management and policies for visual resources that would be relevant to the Project. Specifically, the MPSC requires solar developers to qualitatively assess the existing, proposed, and allowable land uses, especially residences, schools, public and recreational facilities, and commercial properties, within 1,000 feet of a proposed solar development to “demonstrate that conflicts from facility-generated noise, traffic, and visual impacts with current and planned uses have been minimized to the extent practicable” (MPSC 2024).

The Project would be constructed within the Palmyra Township within Lenawee County. The Township of Palmyra has limited direction regarding impact management and policies for visual resources relevant to the Project. The direction for development and zoning for energy facilities is contained in the Palmyra Township Zoning Ordinance #11-2020 which was amended 07/25/2023 (Palmyra Township 2023). Relevant information for an applicant who seeks to install a Level 3 Solar Energy Site includes:

Section C. Application for Site Plan Review for Level 3 SES

6. Description of the screening to be provided for the ground or wall mounted solar energy equipment (see Exhibit A-1.1 Vegetation Management and Landscape Plan for how this requirement was addressed).

8. Buffering Between Land Uses: Upon any improvement for which a Site plan is required, a landscape buffer shall be required to create a visual screen at least six (6) feet in height along all adjoining boundaries whenever a Level 3 SES use abuts a nonparticipating residential property (see **Appendix II Exhibit A-1.1** Vegetation Management and Landscape Plan for how this requirement was addressed).).

9. Visual inspections: Review and demonstrate the visual impact using photos or renderings of the project or similar projects with consideration given to tree plantings and setback requirements.

Section D. Level 3 SES Solar Farms:

3. Height Restrictions: All panels located in a solar farm shall be restricted to a height of fourteen (14) feet when oriented at maximum tilt. (The solar panels will not exceed a maximum height of 14 feet above ground when the arrays are at full tilt. The Applicant currently anticipates solar panel components will be 10 feet above ground when the arrays are at full tilt.)

The Visual Resource Management (“VRM”) system developed by the Bureau of Land Management (“BLM”) has become an industry standard to analyze potential visual impacts, particularly in the western United States, and is often applied to projects on non-BLM lands (BLM 1986a). The BLM VRM system and other visual resource methodologies developed by other federal agencies (e.g., U.S. Forest Service’s [1995] scenery management system and Federal Highway Administration’s [2015] *Guidelines for the Visual Impact Assessment of Highway Projects*) generally evaluate impacts on the following elements:

- Landscape character: overall visual and cultural impression of the landscape based on the distinct landscape attributes that exist throughout an area
- Viewing locations: specific locations from which the public commonly views the landscape, including residences, travel routes, and recreation areas

3 EXISTING CONDITIONS

Visual resources in the vicinity of the Project area (the landscape) consist of landforms (topography and soils), vegetation, bodies of water (lakes, streams, and rivers), and human-made structures (roads, buildings, and modifications of the land, vegetation, and water). These elements of the landscape can be described in terms of their form, line, color, and texture.

3.1 Existing Landscape Character

The term *landscape character* refers to the overall visual and cultural impression of the landscape based on the distinct landscape attributes that exist throughout an area. Landscape character is a product of both natural and human influences on the landscape. The term *landscape character* is often confused with the term *scenic quality*, which instead is a measure of the intrinsic beauty of landforms, water forms, or vegetation in the landscape. Information on Level III and IV ecoregions (Omernik 2007, 2010) provides a starting point for documenting existing scenery.

The study area is located within the Huron/Erie Lake Plains Level III ecoregion, and more specifically within the Maumee Lake Plain and Clayey, High-Lime Till Plains Level IV ecoregions. The Maumee Lake Plain is a Pleistocene glacial lake plain that contains clayey lake deposits, poorly drained fertile soils, and water-worked glacial till. Elm-ash swamp forests and beech forests were once widespread and extensive marshland occurred along the coast. Both forests and marshes have been mostly drained and tilled for farmland. The Clayey, High-Lime Till Plains ecoregion consists of rolling ground moraines and deep, clay loam soils. This area has been under intensive agricultural production since the mid-nineteenth century. The region's corn, soybean, wheat, and livestock farming have replaced the original land cover of beech-sugar maple and oak-hickory forests (Omernik 2007, 2010). Within both of these ecoregions, the conversion of forests and marshes to farmland has resulted in a landscape patchwork with geometric agricultural shapes and seams of trees and brush forming borders and providing tall linear screening between fields. The landscape is mostly flat with some slight undulation, making it ideal for agricultural development. The area is accompanied by rural development and ancillary geometrical and cylindrical structures associated with agriculture, including barns and silos.

On April 3 and 4, 2025, SWCA conducted a site visit and took representative photographs of the existing conditions within the Project and study areas from public roadways (see Figures 1 through 3).



Figure 1. View of existing conditions within the Project area from Carleton Road.



Figure 2. View of existing conditions within the Project area from Cook Road.



Figure 3. View of existing conditions within the Project area from Humphrey Highway.

3.2 Viewing Locations and Key Observation Points

Viewing locations, or KOPs, represent places where the public may be sensitive to development and from which the Project could be visible. These KOPs establish the baseline for how impacts on views are assessed. For this analysis, KOPs were identified where the public would potentially have views of the Project, including from residential areas, travel routes, recreation areas, and specially designated areas, represented both by static viewpoints (e.g., residences, etc.) and from linear viewpoints (e.g., highways, trails, etc.). The level of viewer sensitivity to changes in the landscape, as viewed from KOPs, varies based on duration of view, volume of use, visual sensitivity, and if the viewing location has scenic or historic status. In general, views from residential areas and along designated scenic roads (e.g., national, state, or local scenic byways and other scenic drives) are assigned a high sensitivity, as it is anticipated that there would be a greater desire and expectation for viewing intact, naturalistic landscapes. Views from interstate, federal, and state highways not designated as scenic and from other travel routes are assigned a moderate sensitivity, as the landscape would be visible from the location but would not be dependent on the use of these viewing locations.

The distance from which the Project would be visible also factors into the level of visual impact. The BLM VRM system (BLM 1986b) guidelines and other visual resource systems establish a series of distance zones to identify visibility thresholds and inventory the existing landscape. For the purposes of this assessment, the distance to the Project (in miles) was used to identify viewing distance. The following distance zones were used for evaluating impacts on scenery from each KOP:

- Immediate Foreground: within 0.25 mile
- Foreground: 0.25 to 1 mile
- Middle Ground/Background: 1 mile and outside the study area

This assessment particularly focuses on the immediate foreground distance zone, where views of modifications to the landscape would be most prominent, leading to views potentially dominated by Project infrastructure. Table 1 summarizes the KOP locations, the viewer type and viewer sensitivity, the distance zone of the KOP relative to the proposed Project, and the rationale for selection. The KOP locations, in context with the Project, are displayed in Figure 4.

Table 1. KOP and Viewer Location Details

KOP Number	KOP Name	KOP Location	Description	Viewer Sensitivity	Distance to Nearest Solar Array Area Distance Zone	Rationale for Selection
1	Humphrey Highway	41°52'31.08"N / 83°58'38.00"W	Travel route and residential area	Moderate	211 feet Immediate Foreground	This KOP provides a travel route view from Humphrey Highway. This KOP is also representative of residential properties with direct Project views.
2	South Myers Highway and East Carleton Road	41°51'42.59"N / 83°57'45.87"W	Travel route	Moderate	158 feet Immediate Foreground	This KOP provides a travel route view from the intersection of two roadways within the Project boundary. Solar array development is proposed in all directions.
3	Meyers Highway	41°52'36.84"N / 83°57'47.83"W	Travel route	Moderate	14 feet Immediate Foreground	This KOP provides a travel route view from Meyers Highway and is representative of views of the arrays, substation, O&M, and switchyard.
4	Hodges Highway	41°49'46.98"N / 83°58'52.98"W	Travel route and residential area	Moderate	0.22 mile Immediate Foreground	This KOP provides a travel route view from Hodges Highway. This KOP is also representative of non-adjacent residential views.
5	Highway 223	41°51'48.92"N / 83°57'19.23"W	Travel route and residential area	Moderate	0.3 mile Immediate Foreground	This KOP provides a travel route view from Highway 223 within the Project boundary. Solar arrays are proposed to the north and south of this KOP.

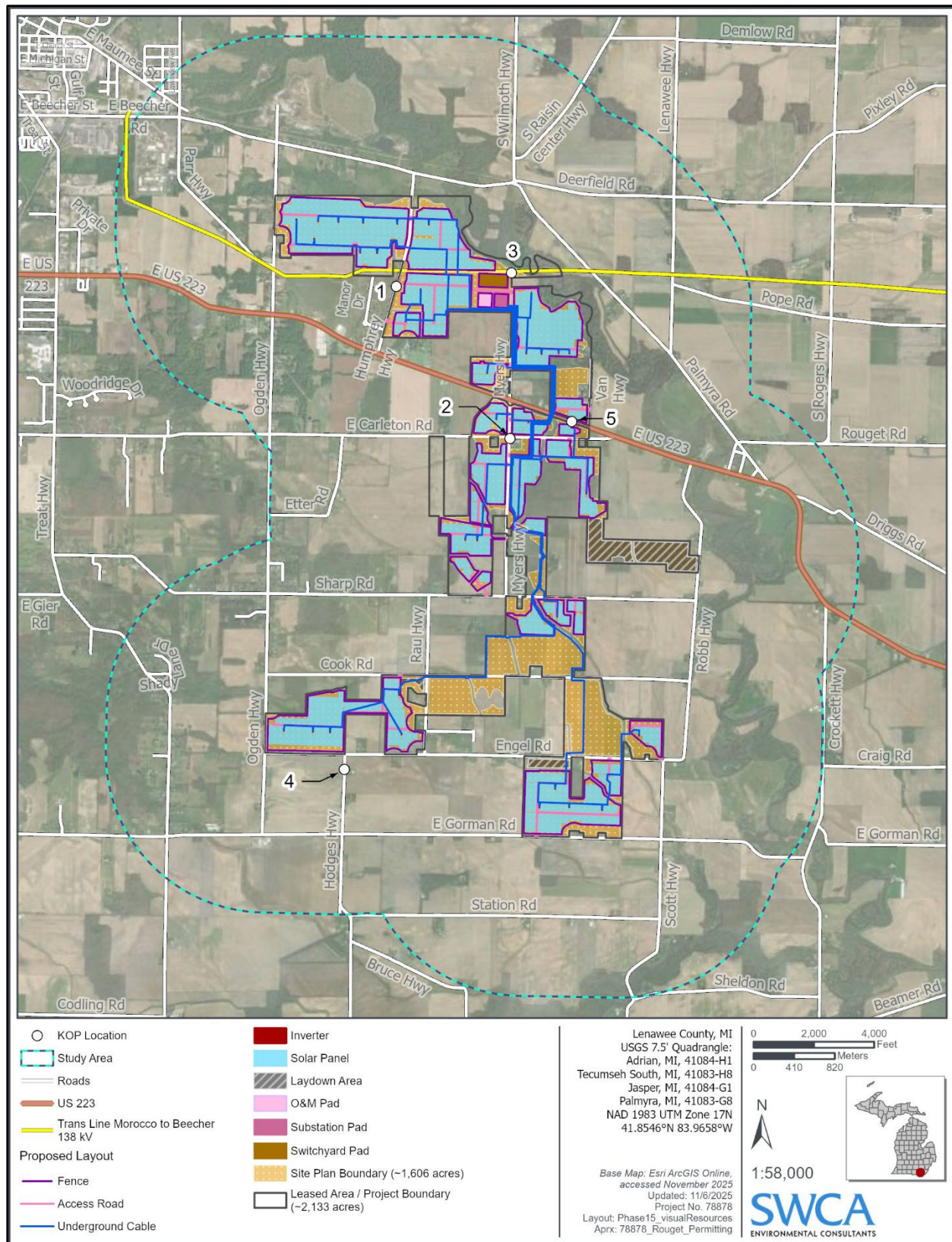


Figure 4. Key observation points.

4 IMPACT ASSESSMENT

Based on the existing conditions, this section outlines the methods used to conduct the visual impact assessment and describes the visual impacts resulting from the Project.

4.1 Analysis Methods

The evaluation of impacts was based on the level of visual contrast, defined as the degree of visual change introduced by a Project, as indicated by modifications to basic design elements (form, line, color, and texture), compared to the existing visual setting. Visual contrast was assessed based on a range of contrast from strong to none, following the direction of BLM Manual 8431 (BLM 1986a):

- None: the element contrast (the Project) is not visible or perceived.
- Weak: the element contrast (the Project) can be seen but does not attract attention.
- Moderate: the element contrast (the Project) begins to attract attention and begins to dominate the characteristics of the landscape.
- Strong: the element contrast (the Project) demands attention, will not be overlooked, and is dominant in the landscape.

After assessing the level of visual contrast introduced by the Project, the level of impact on overall landscape character and on views from identified KOPs was evaluated using the criteria described in Table 2 and taking into account the viewer sensitivity (moderate or high) and distance zone at each KOP.

Another consideration for assessing impacts on views from KOPs associated with proposed solar facilities is the influence of lighting conditions and the consideration of the intensity of reflection or shadowing. Therefore, an analysis of potential glint and glare generated by the Project was completed using the ForgeSolar (2025) GlareGauge model, which is based on the Solar Glare Hazard Analysis Tool developed by the U.S. Department of Energy's Sandia National Laboratories, from each KOP location (Appendix A) (SWCA 2025). *Glare* is defined as the sensation produced by luminance within the visual field that is sufficiently greater than the luminance to which the eyes are adapted, which causes annoyance, discomfort, or loss in visual performance and visibility. The effects of glare can vary from an insignificant momentary blinding to temporarily seeing spots or after-images; if intense enough or of a long enough duration, glare can cause permanent vision damage. "Green" glare is glare with low potential to cause an afterimage (flash blindness) when observed prior to a typical blink response time. "Yellow" glare is glare with potential to cause an afterimage (flash blindness) when observed prior to a typical blink response time (see Appendix A).

Table 2. Criteria for Assessing Level of Impact on Visual Resources

Impact Level	Impacts on Landscape Character	Impacts on Viewing Locations
Negligible	Landscape would appear unaltered, and Project components would not be visually evident. Project components would repeat the form, line, color, texture, or scale common in the landscape.	Project components would repeat form, line, color, texture, or scale common in the landscape and would not be visually evident to the casual observer.
Low	Landscape would appear slightly altered. Project components would introduce form, line, color, texture, or scale common in the landscape, would be visually subordinate, and would not attract attention.	Project components would introduce form, line, color, texture, or scale common in the landscape and would create weak contrast compared with other features in the landscape when viewed. The Project would be seen, but would not attract attention of the casual observer.
Moderate	Landscape would appear to be moderately altered, and Project components would begin to dominate the visual setting. Project components would introduce form, line, color, texture, or scale not common in the landscape and would be visually prominent in the landscape.	Project components would introduce form, line, color, and texture that would attract attention of the casual observer and would create moderate contrast compared with other features in the landscape when viewed.
High	Landscape would appear to be heavily altered, and Project components would dominate the visual setting. Project components would be out of scale or contain detail that is out of character with the existing landscape.	Project components would introduce form, line, color, and texture that would be visually dominant for the casual observer and would dominate the visual setting, creating strong contrast compared with other features in the landscape.

4.2 Results

4.2.1 Construction

During construction, impacts on the landscape and existing visual resources would primarily be associated with dust and with increased activity (e.g., the movement of vehicles and equipment and the presence of construction workers) that would attract attention. During construction and grading, the removal of vegetation and earthwork would introduce areas of exposed soil, which would contrast with the existing setting until vegetation has been restored. Impacts common to KOPs during construction include views of additional vehicular traffic, associated dust, and areas of exposed soil after the removal of vegetation and during earthwork activities. These impacts would occur for the duration of construction and would cease after construction is complete and vegetation has been restored.

4.2.2 Maintenance and Operation

The longest duration of impacts would occur during the maintenance and operation phase of the Project. The Project would introduce forms, lines, colors, and textures that are uncommon in the landscape and would develop previously undeveloped agricultural and rural areas into energy infrastructure. Table 3 summarizes the determined level of contrast and impacts to the existing landscape for each KOP.

Viewers within the immediate foreground (within 0.25 mile of the Project) would experience the greatest degree of visual modification to the landscape and visual contrast from the Project due to their proximity and ability to clearly make out individual details of Project components. Observing the forms, lines, colors, and textures of the Project at this scale would result in a broad portion of viewers' sight lines being visually dominated by the solar development, resulting in a landscape that would appear heavily altered for casual observers. The degree of visual contrast to observers would vary depending on the exact position, existing topography and vegetation, and other development that may be between the Project and viewers.

Table 3. Visual Impacts Resulting from the Project during Operations and Maintenance

KOP Number	KOP Name	Determined Level of Contrast and Summary of Impacts
1	Humphrey Highway	Level of contrast as viewed from KOP 1 would be strong. Views of Project components from this location would be primarily backdropped against trees and other vegetation. Project components would be developed in agricultural fields and visible Project components would consist of horizontal, rigid blackish-blue rectangular solar arrays (the most impacting component of the Project), repeating across the horizon, chain link security fencing and associated electrical equipment and infrastructure. These components would be within the immediate foreground of viewers. This roadway provides access primarily to local/residential travelers. The proposed transmission line would run perpendicular to Humphrey Highway approximately 0.1 mile to the northeast and would parallel an existing line. Nearby residences would experience the same views as vehicular travelers, but Project views would be experienced for an extended duration of time. Project components would introduce form, line, color, texture, and scale not common in the landscape. The Project would demand attention, would not be overlooked, and would be dominant in the visual setting of the landscape.
2	South Myers Highway and East Carleton Road	Level of contrast as viewed from KOP 2 would be strong. Views of Project components from this location would be primarily backdropped against trees, other vegetation, agricultural fields and scattered rural development. Project components would be developed in agricultural fields and visible Project components would consist of horizontal, rigid blackish-blue rectangular solar arrays (the most impacting component of the Project) repeating across the horizon, chain link security fencing and associated electrical equipment and infrastructure. These components would be within the immediate foreground of viewers. This roadway provides access to both residential travelers and destination travelers. The Project would demand attention, would not be overlooked, and would be dominant in the visual setting of the landscape. Project components would introduce form, line, color, texture, and scale not common in the landscape.
3	Meyers Highway	Level of contrast as viewed from KOP 3 would be strong. Views of Project components from this location would be primarily backdropped by trees, seasonal crops in agricultural fields and scattered rural development along the roadway. KOP 3 is located at the northern end of the road terminus. Project components, where visible, would be developed in agricultural fields and visible Project components would consist of horizontal, rigid blackish-blue rectangular solar arrays (the most impacting component of the Project) repeating across the horizon, chain link security fencing and associated electrical equipment and infrastructure. Also visible at this location would be the Project substation pad, O&M Pad (which would likely have a geometric structure like a small building for storage of operation and maintenance of the Project), existing transmission line (Morocco to Beecher 138kV line) and the switchyard pad. These components would be within the immediate foreground of viewers. This roadway provides access to primarily residential travelers who are traveling north towards the KOP and destination travelers (likely headed to connect onto Highway 223). The Project would demand attention, would not be overlooked, and would be dominant in the visual setting of the landscape. Project components would introduce form, line, color, texture, and scale not common in the landscape.
4	Hodges Highway	Level of contrast as viewed from KOP 4 would be strong. Views of Project components from this location would be primarily backdropped against trees and other vegetation. Project components would be developed in agricultural fields and visible Project components would consist of horizontal, rigid blackish-blue rectangular solar arrays (the most impacting component of the Project) repeating across the horizon, chain link security fencing and associated electrical equipment and infrastructure. These components would be within the immediate foreground of viewers. This roadway provides access to primarily local/residential travelers. Nearby residences would experience the same views as vehicular travelers, but Project views would be experienced for an extended duration of time. The Project would demand attention, would not be overlooked, and would be dominant in the visual setting of the landscape. Project components would introduce form, line, color, texture, and scale not common in the landscape.

KOP Number	KOP Name	Determined Level of Contrast and Summary of Impacts
5	Highway 223	Level of contrast as viewed from KOP 5 would be strong. Views of Project components from this location would be primarily backdropped against trees and other vegetation. Project components would be developed in agricultural fields and be visible. Project components would consist of horizontal, rigid blackish-blue rectangular solar arrays (the most impactful component of the Project) repeating across the horizon, chain link security fencing and associated electrical equipment and infrastructure. These components would be within the immediate foreground of viewers. This roadway provides access to primarily local/residential travelers. The proposed transmission line would run perpendicular to Humphrey Highway approximately 0.1 mile to the northeast and would parallel an existing line. Nearby residences would experience the same views as vehicular travelers, but Project views would be experienced for an extended duration of time. The Project would demand attention, would not be overlooked, and would be dominant in the visual setting of the landscape. Project components would introduce form, line, color, texture, and scale not common in the landscape.

Viewers within the foreground (between 0.25 and 1 mile) would experience low to strong degrees of visual contrast from the Project due to their proximity. The ability to make out individual details of Project components would be lessened, but still possible. Project components would begin to be looked at more as a mass than as individual components. The degree of visual contrast to observers would vary depending on exact position, existing topography and vegetation, and other development that may be between the Project and viewers.

Viewers within the middle ground/background (1 mile and beyond) would experience moderate to no degree of visual contrast from the Project due to the increasing distance from the Project. Project components would be considered more as a mass than individual components. The Project is still likely to be seen as a dominant development within the existing landscape, as viewers would be able to see that this type of development is uncommon within the area and would introduce forms, line, color, and texture at a scale not currently seen in the landscape. The degree of visual contrast to observers would vary depending on the exact position, existing topography and vegetation, and other development that may be between the Project and viewers.

The Project has the possibility to create glare at three of the five KOPs (Table 4; see Appendix A). Most of the glare is likely to occur in the early morning and late evening when the sun is low on the horizon, although KOP 5 may also experience some later afternoon glare.

Table 4. Glint and Glare Effects

Observation Point Number and Name	Hazard Level	Minutes per Year	Months When Glare Occurs	Time of Day Glare Occurs	Minutes Per Day
KOP 1 (OP 1): Humphrey Highway	Green	452	Mid-May to mid-August	7:00 p.m. to 8:00 p.m.	15
KOP 2 (OP 2): South Myers Highway and East Charleton Road	N/A	-	-	-	-
KOP 3 (OP 3): Meyers Highway	N/A	-	-	-	-
KOP 4 (OP 4): Hodges Highway	Green	291	Mid-April	5:45 p.m. to 6:45 p.m.	13
			Mid-August to mid-September	6:00 p.m. to 6:45 p.m.	13
KOP 5 (OP 5): Highway 223	Green	102	Early to late January	4:15 p.m. to 5:15 p.m.	6

Source: SWCA (2025) (see Appendix A)

4.2.3 Decommissioning

Impacts associated with decommissioning of the Project would be similar to construction, and conditions would persist until vegetation had been restored and established.

5 SELECTIVE MITIGATION MEASURES

The MPSC requires solar developers to qualitatively assess the existing, proposed, and allowable land uses, especially residences, schools, public and recreational facilities, and commercial properties, within 1,000 feet of a proposed solar development to “demonstrate that conflicts from facility-generated noise, traffic, and visual impacts with current and planned uses have been minimized to the extent practicable” (MPSC

2024). With the application of mitigation measures discussed below, it is anticipated that the visual impacts to current and planned landscape uses will be minimized to the extent practicable.

The following mitigation measures would assist in reducing the visual impact of the Project during construction, operations, and decommissioning.

5.1 Construction

The visual impacts from construction related to dust caused by grading can be reduced using dust abatement measures, such as restricting vehicle speeds and watering active construction areas and roadways. A traffic management plan would be implemented to minimize and manage the movement of vehicles and equipment on roadways and on-site.

After grading and vegetation removal, the majority of the areas disturbed by grading would be re-seeded, including the areas underneath the PV arrays and perimeter areas, with a pollinator seed mix of forbs, grasses, and nurse crops, encouraging the establishment of native perennial grasses and forbs. Seeding should begin within 48 hours of final grading.

5.2 Maintenance and Operation

Visual impacts associated with solar arrays could be further reduced by using non-reflective materials, finishes, surface treatments, or color-treatments of the solar array support structures. Structures that are grouped together should be treated with the same colors, and color treatment selection for structures and transmission line poles should reduce contrast with the existing landscape. All treated surfaces (painted, stained, or coated) should be maintained.

Any associated structures (substation, energy storage system, fencing, generation-tie line, and operations and maintenance building and area) should be designed and sited to be the least visually obtrusive. Color treatment of associated structures should be selected to blend in with the surrounding landscape. Any structure lighting should be directed to eliminate light spill and light trespass, and lighting usage should be minimized to reduce visual impacts associated with light pollution.

Areas that have been seeded with the pollinator seed mix would need to be monitored and maintained over the life of the Project. These areas are to be minimally disturbed during the growing season. Mowing and other maintenance activities (like noxious weed management) should be minimized to once annually and timed appropriately for existing reestablished vegetation. Subsequent annual mowing should only occur to control invasive species, woody species encroachment, and reduce seed head viability of taller native or introduced species within the PV array area. Monitoring and controlling noxious weeds and undesirable plant species is critical to maintaining healthy vegetation in the Project area.

Herbicide application should be applied only via spot spraying and applied only to maintained service areas, roads, and around miles/masts of the PV arrays as needed. Noxious weed and undesirable vegetation control methods would be applied as approved by the Applicant (see Exhibit A-1.1 Vegetation Management and Landscape Plan for the Rouget Road Solar Farm Project for more details).

To address identified areas requiring visual mitigation, a vegetative screening plan will be developed. Prescribed vegetative screening will consist of regionally native, drought-tolerant, and herbivory resistant species. Species endemic to the site will be used for consistency with the existing landscape, to the extent practicable. Screening material density, species blend (i.e., conifers and deciduous), and species size at installation will be further developed to meet requirements of the particular areas to be screened. Generally,

proposed tree and shrub screening material will be restoration grade and 4 to 6 feet in height at installation. Restoration grade material generally has better survivability and is more readily available at the quantities potentially required for screening. Within 10 years of installation, it is anticipated that selected screening trees will be approximately 10 to 12 feet in height, and selected shrubs will be between 6 to 8 feet in height. This type of screening in the landscape would help reduce but not erase visual impacts to viewers.

5.3 Decommissioning

After the commercial operation of the Project ceases, the Project area should be restored to a landscape that once again blends into the surrounding valley's forms and textures. The decommissioning of the Project would create new visual impacts, including the removal of all aboveground structures, fencing, and debris. This should be accomplished by restoring the Project area to its original contours while minimizing disturbance to the soil. Soils that were disturbed through the removal of the Project materials should be stabilized by seeding. Because of the arid climate of this location, planting and reseedling may need to occur over several seasons to ensure that native species are able to establish. It is recommended that vegetation used to stabilize the Project area post-decommissioning be similar to vegetation types that are present in the Project area and surrounding landscape at the time of reclamation.

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APPENDIX A

Glint and Glare Assessment

TECHNICAL MEMORANDUM

To: RWE Solar Development, LLC
353 N. Clark Street, 30th Floor
Chicago, Illinois 60654

From: Spenser Branch, Associate Project Visual Simulation Specialist

Date: April 9, 2025, Revised for updated design November 11, 2025

Re: **Glint and Glare Assessment, Rouget Road Solar Energy Project, Lenawee County, Michigan / SWCA Project No. 78878**

INTRODUCTION

Rouget Road Solar Farm, LLC (“Applicant”), proposes to construct, operate, and maintain the Rouget Road Solar Energy Project (“Project”). The Project is a proposed 175-megawatt (“MW”) alternating current (“AC”) solar photovoltaic (“PV”) power generating facility. The Project would be in Lenawee County, Michigan, near the city of Adrian (the Project area) (Figure 1). The Project Boundary/Leased Parcels is approximately 2,133 acres of predominantly agricultural land. Once built, the fenced-in portion of the Project would be approximately 1,042 acres. The primary travel route near the project is Highway 223 with secondary routes that support access to private land and residences.

Purpose

The purpose of this memorandum is to summarize potential glinting and glare effects of the Project. Based on the results of these effects, potential health, safety, and visual mitigation measures associated with these glint and glare effects may be proposed. For the purposes of this memorandum, *glint* is defined as a bright, momentary flash of light and *glare* is defined as a more continuous and sustained presence of light that may appear to “sparkle” from public viewing locations.

The source of potential glint and glare for the project are the proposed PV panels. However, PV panel surfaces are designed specifically not to reflect light, thus reducing the potential for glint and glare.

METHODS

SWCA Environmental Consultants (SWCA) conducted the glint and glare analysis for the Project using the GlareGauge model developed by ForgeSolar (2025a), which is based on the Solar Glare Hazard Analysis Tool developed by the U.S. Department of Energy’s Sandia National Laboratories, to evaluate potential glare. The analysis focused on potential glare effects as viewed from a set of five observation points (OPs) based on an observer height of 6 feet. The OPs used in the analysis coincide with the key observation points identified in the Visual Resources Desktop Assessment (SWCA 2025) and consist of five travel routes and residences (Table 1; see Figure 1).

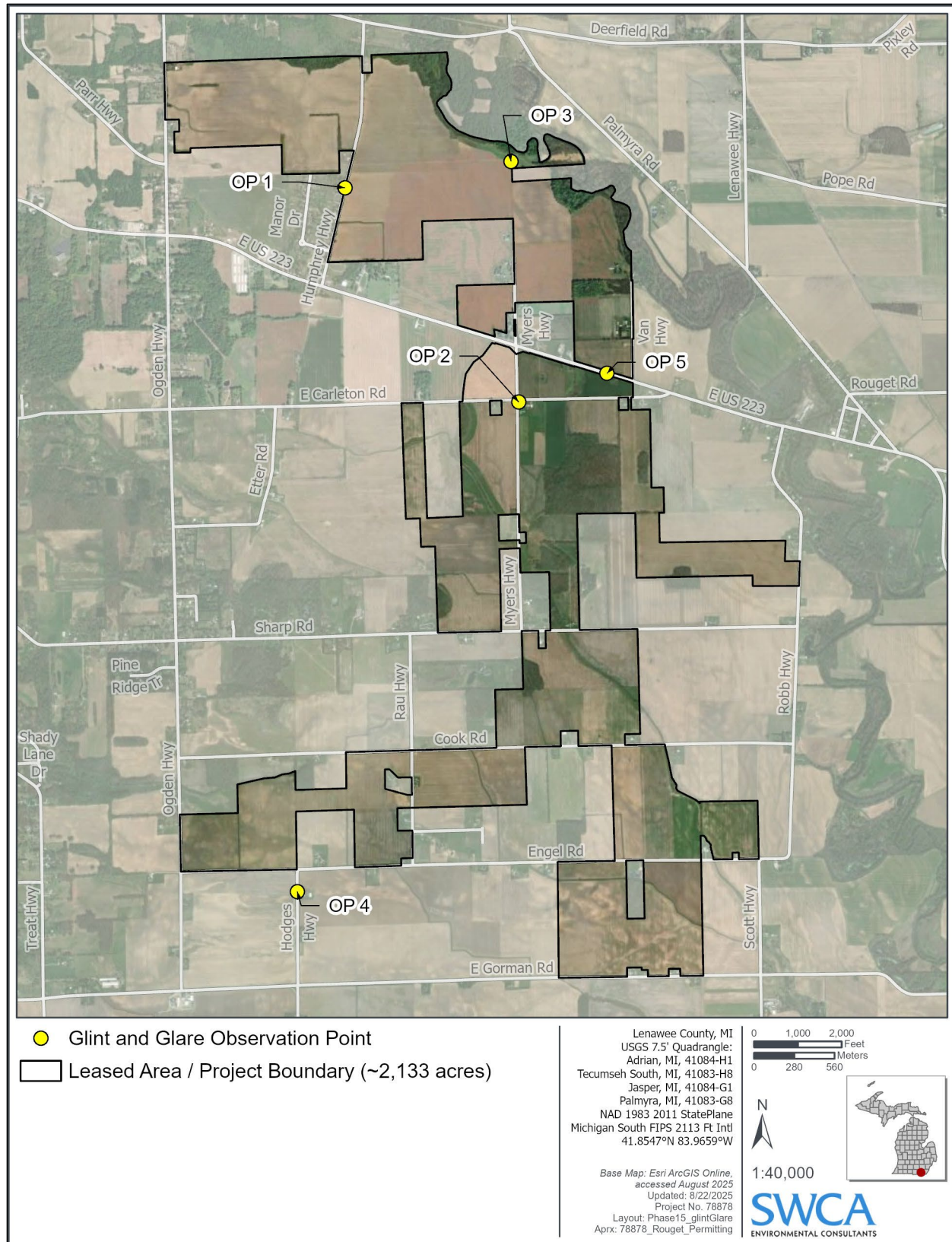


Figure 1. Project area and OPs.

Table 1. Glare Observation Points

OP Name	Description
OP 1 (KOP 1): Humphrey Highway	Travel route and residence near Project area
OP 2 (KOP 2): South Myers Highway and East Charleton Road	Travel route and residence near Project area
OP 3 (KOP 3): Meyers Highway	Travel route and residence near Project area
OP 4 (KOP 4): Hodges Highway	Travel route and residence near Project area
OP 5 (KOP 5): Highway 223	Travel route and residence near Project area

Software

The GlareGauge model employs an interactive Google map where the user can quickly locate a site, draw an outline of the proposed solar energy system, and specify observer locations and, if needed, aircraft approach paths. Latitude, longitude, and elevation are automatically recorded through the Google interface, providing necessary information for sun position and vector calculations. Additional information regarding the orientation and tilt of the solar energy panels, reflectance, environment, and ocular factors are entered by the user.

If glare is found, the tool calculates the retinal irradiance and subtended source angle (size/distance) of the glare source to predict potential ocular hazards ranging from a temporary afterimage to retinal burn. The results are presented in a simple, easy-to-interpret plot that specifies when glare will occur throughout the year, with color codes indicating the potential ocular hazard. The tool can also predict relative energy production while evaluating alternative designs, layouts, and locations to identify configurations that maximize energy production while mitigating the impacts of glare.

Assumptions

- The proposed solar project will operate 365 days per year, during daylight hours.
- “Green” glare is glare with low potential to cause an afterimage (flash blindness) when observed prior to a typical blink response time.
- “Yellow” glare is glare with potential to cause an afterimage (flash blindness) when observed prior to a typical blink response time.
- Times associated with glare are denoted in standard time.
- Glare analyses do not account for varying ambient conditions (e.g., cloudy days, precipitation), atmospheric attenuation, screening due to existing topography not located within the defined array layouts, or physical obstructions (existing vegetation, structures, fences, or walls) between reflectors and receptors. Additionally, the GlareGauge model does not account for proposed landscaping; therefore, the predicted results from the GlareGauge model are conservative.
- Several calculations use the PV array centroid, rather than the actual glare spot location, due to algorithm limitations. This may affect results for large PV footprints. Additional analyses of array subsections can provide additional information on expected glare.
- The subtended source angle (glare spot size) is constrained by the PV array footprint size. Partitioning large arrays into smaller sections will reduce the maximum potential subtended angle, potentially impacting results if actual glare spots are larger than the sub-array size. Additional analyses of the combined area of adjacent sub-arrays can provide more information on potential glare hazards.
- Glare locations displayed on receptor plots are approximate. Actual glare spot locations may differ.

- Glare vector plots are simplified representations of analysis data. Actual glare emanations and results may differ.
- The glare hazard determination relies on several approximations, including observer eye characteristics, angle of view, and typical blink response time. Actual results and glare occurrence may differ.
- Actual ocular impact outcomes encompass a continuous, not discrete, spectrum.¹

Input Parameters

SWCA input the following specifications of the array into the GlareGauge model: a single-axis tracking system with a north-south orientation, maximum tracking angle of 60 degrees, resting angle of 0 degrees, shade-slope tracking method, and a panel height of 14 feet above ground level with a smooth panel surface with anti-reflective coating to provide maximum flexibility in module selection. Obstructions were placed near OPs 1 and 2 in areas that fit the setback and non-participating criteria as determined in the vegetation management plan.

RESULTS

The Project has the possibility to create glare at three of the five OPs (Table 2). Most of the glare is likely to occur in the early morning and later evening when the sun is low on the horizon, although OP 5 may also experience some later afternoon glare. No predicted glare events exceed thresholds associated with permanent or serious ocular injury (ForgeSolar 2025b) or public health and safety hazard as defined by industry standards. Should any glare-related complaints be received post-construction, the applicant will review and implement additional mitigation as appropriate, consistent with the Complaint Resolution Process.

The Project has the possibility to create green glare for viewers at OP 1. Green glare would occur from the middle of May to the middle of August between the hours of 7:00 p.m. and 8:00 p.m. for up to approximately 15 minutes per day.

The Project has the possibility to create green glare for viewers at OP 4. Green glare would occur during the middle of April between the hours of 5:45 p.m. and 6:45 p.m. for up to approximately 13 minutes per day. Green glare would also occur from the middle of August to the middle of September between the hours of 6:00 p.m. and 6:45 p.m. for up to approximately 13 minutes per day.

The Project has the possibility to create green for viewers at OP 5. Green glare would occur from early to late January between the hours of 4:15 p.m. to 5:15 p.m. for up to approximately 6 minutes per day.

¹ See ForgeSolar (2025b) for assumptions and limitations not listed here.

Table 2. Glint and Glare Effects

KOP Number and Name	Hazard Level	Minutes per Year	Months When Glare Occurs	Time of Day Glare Occurs	Minutes Per Day
OP 1: Humphrey Highway	Green	452	Mid-May to mid-August	7:00 p.m. to 8:00 p.m.	15
OP 2: South Myers Highway and East Charleton Road	N/A	-	-	-	-
OP 3: Meyers Highway	N/A	-	-	-	-
OP 4: Hodges Highway	Green	291	Mid-April	5:45 p.m. to 6:45 p.m.	13
			Mid-August to mid-September	6:00 p.m. to 6:45 p.m.	13
OP 5: Highway 223	Green	102	Early to late January	4:15 p.m. to 5:15 p.m.	6

RECOMMENDATIONS

Mitigation measures such as the use of non-reflective materials, finishes, and surface treatments on Project components would reduce contrast and glare. Visual (vegetation) barriers are the most effective at mitigating glare from solar arrays when the vegetation is located as close to the source as possible. If vegetation is used, native and naturalized plants should be specified to match or complement existing vegetation within the area. If vegetative screening is utilized, pollinator-friendly and non-invasive species will be prioritized in accordance with the Michigan Pollinator Habitat Planning Scorecard for Solar Sites (MSU DE 2018). Existing vegetation within and surrounding the Project area should be maintained and preserved to the greatest extent possible. Preserving existing vegetation will reduce the Project's overall impact on the existing health of soils, wildlife, cost, and visual aesthetics. Another option for a visual barrier would be to install opaque fencing to directly screen views of the solar arrays sited near residences where glare was predicted in the analysis. To allow the proposed fencing to blend into the setting, fencing can be color-treated to minimize color contrast with the existing landscape.

LITERATURE CITED

- ForgeSolar. 2025a. GlareGauge (software). Available at: <https://www.forgesolar.com/tools/glaregauge/>. Accessed April 2025.
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- Michigan State University Department of Entomology (MSU DE). 2018. Michigan Pollinator Habitat Planning Scorecard for Solar Sites. Available at: https://www.canr.msu.edu/home_gardening/uploads/files/MSU_Solar_Pollinators_Scorecard_2018_October.pdf. Accessed July 2025.
- SWCA Environmental Consultants (SWCA). 2025. *Visual Resources Desktop Assessment for the Rouget Road Solar Energy Project, Lenawee County, Michigan*. Prepared for RWE Solar Development, LLC. Lombard, Illinois: SWCA Environmental Consultants.

APPENDIX A

GlareGauge Output Model Report

78878_Rouget Road Solar

78878_Rouget Road Solar_10ft_0deg_10_16_25

Created Oct 16, 2025
Updated Oct 16, 2025
Time-step 1 minute
Timezone offset UTC-5
Minimum sun altitude 0.0 deg
Site ID 161977.24452

Project type Advanced
Project status: active
Category 1 MW to 5 MW

Misc. Analysis Settings

DNI: varies (1,000.0 W/m² peak)
 Ocular transmission coefficient: **0.5**
 Pupil diameter: **0.002 m**
 Eye focal length: **0.017 m**
 Sun subtended angle: **9.3 mrad**

PV Analysis Methodology: **Version 2**
 Enhanced subtended angle calculation: **On**

Summary of Results Glare with potential for temporary after-image predicted

PV Name	Tilt	Orientation	"Green" Glare	"Yellow" Glare	Energy Produced
	deg	deg	min	min	kWh
PV array 1	SA tracking	SA tracking	0	0	-
PV array 10	SA tracking	SA tracking	0	0	-
PV array 11	SA tracking	SA tracking	0	0	-
PV array 12	SA tracking	SA tracking	0	0	-
PV array 13	SA tracking	SA tracking	160	0	-
PV array 14	SA tracking	SA tracking	0	0	-
PV array 15	SA tracking	SA tracking	0	0	-
PV array 16	SA tracking	SA tracking	691	67	-
PV array 17	SA tracking	SA tracking	0	0	-
PV array 18	SA tracking	SA tracking	0	0	-
PV array 19	SA tracking	SA tracking	0	0	-
PV array 2	SA tracking	SA tracking	469	420	-
PV array 3	SA tracking	SA tracking	181	0	-
PV array 4	SA tracking	SA tracking	0	0	-
PV array 5	SA tracking	SA tracking	0	0	-
PV array 6	SA tracking	SA tracking	0	0	-
PV array 7	SA tracking	SA tracking	0	0	-
PV array 8	SA tracking	SA tracking	0	0	-
PV array 9	SA tracking	SA tracking	2,427	0	-

Component Data

PV Array(s)

Total PV footprint area: 1,233.1 acres

Name: PV array 1
Footprint area: 170.3 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.880538	-83.991393	768.49	10.00	778.49
2	41.881488	-83.991414	767.58	10.00	777.58
3	41.882471	-83.991414	772.31	10.00	782.31
4	41.882691	-83.990856	770.06	10.00	780.06
5	41.883006	-83.990406	768.79	10.00	778.79
6	41.883018	-83.988206	756.67	10.00	766.67
7	41.883030	-83.986136	748.35	10.00	758.35
8	41.883042	-83.983990	744.69	10.00	754.69
9	41.883054	-83.981887	741.72	10.00	751.72
10	41.882952	-83.981777	741.80	10.00	751.80
11	41.882840	-83.981072	740.74	10.00	750.74
12	41.882787	-83.980476	739.72	10.00	749.72
13	41.882567	-83.980246	738.36	10.00	748.36
14	41.882696	-83.980004	738.99	10.00	748.99
15	41.882802	-83.978408	739.01	10.00	749.01
16	41.883026	-83.977875	736.82	10.00	746.82
17	41.883008	-83.976743	737.41	10.00	747.41
18	41.882239	-83.976002	737.32	10.00	747.32
19	41.880973	-83.976048	735.98	10.00	745.98
20	41.879931	-83.976094	736.91	10.00	746.91
21	41.878980	-83.976370	736.31	10.00	746.31
22	41.878157	-83.976603	735.44	10.00	745.44
23	41.878157	-83.977531	735.27	10.00	745.27
24	41.879168	-83.977617	737.05	10.00	747.05
25	41.879172	-83.977805	736.86	10.00	746.86
26	41.878037	-83.977923	735.43	10.00	745.43
27	41.877482	-83.978451	736.27	10.00	746.27
28	41.876967	-83.978744	735.89	10.00	745.89
29	41.876963	-83.980390	733.96	10.00	743.96
30	41.876959	-83.982166	737.00	10.00	747.00
31	41.878816	-83.982214	738.57	10.00	748.57
32	41.878812	-83.982676	738.85	10.00	748.85
33	41.878185	-83.982676	738.60	10.00	748.60
34	41.878178	-83.984463	741.50	10.00	751.50
35	41.878171	-83.986293	743.94	10.00	753.94
36	41.878156	-83.988090	749.99	10.00	759.99
37	41.878140	-83.989974	764.67	10.00	774.67
38	41.877944	-83.989977	763.04	10.00	773.04
39	41.877950	-83.990658	757.22	10.00	767.22
40	41.878361	-83.990650	759.90	10.00	769.90
41	41.878863	-83.990637	762.54	10.00	772.54
42	41.879206	-83.990434	761.69	10.00	771.69
43	41.879632	-83.990424	762.92	10.00	772.92
44	41.879969	-83.990614	763.94	10.00	773.94
45	41.880210	-83.990835	764.05	10.00	774.05

Name: PV array 10
Footprint area: 119.5 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.831356	-83.959550	702.51	10.00	712.51
2	41.831635	-83.956739	702.07	10.00	712.07
3	41.831659	-83.954025	698.84	10.00	708.84
4	41.830420	-83.954003	699.50	10.00	709.50
5	41.829261	-83.953982	699.42	10.00	709.42
6	41.829277	-83.952265	697.68	10.00	707.68
7	41.830460	-83.952233	698.36	10.00	708.36
8	41.831675	-83.952201	694.31	10.00	704.31
9	41.831212	-83.951452	696.65	10.00	706.65
10	41.830444	-83.950036	694.09	10.00	704.09
11	41.829837	-83.949822	694.82	10.00	704.82
12	41.829085	-83.948448	693.93	10.00	703.93
13	41.828889	-83.947654	693.67	10.00	703.67
14	41.827599	-83.947595	697.33	10.00	707.33
15	41.826421	-83.947601	697.14	10.00	707.14
16	41.826570	-83.949427	695.45	10.00	705.45
17	41.826564	-83.950062	696.37	10.00	706.37
18	41.826505	-83.950733	696.67	10.00	706.67
19	41.826425	-83.951410	697.42	10.00	707.42
20	41.826410	-83.951895	697.41	10.00	707.41
21	41.826519	-83.952847	697.50	10.00	707.50
22	41.826571	-83.953702	697.62	10.00	707.62
23	41.826455	-83.954344	697.88	10.00	707.88
24	41.825999	-83.954693	699.36	10.00	709.36
25	41.826031	-83.957074	699.43	10.00	709.43
26	41.826047	-83.959606	699.32	10.00	709.32
27	41.827350	-83.959622	699.25	10.00	709.25
28	41.828781	-83.959594	701.87	10.00	711.87
29	41.829996	-83.959572	703.78	10.00	713.78

Name: PV array 11
Footprint area: 22.0 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.832894	-83.951302	698.20	10.00	708.20
2	41.832888	-83.949505	696.93	10.00	706.93
3	41.832882	-83.947719	697.95	10.00	707.95
4	41.831947	-83.947711	697.19	10.00	707.19
5	41.831020	-83.947703	697.90	10.00	707.90
6	41.830084	-83.947695	696.96	10.00	706.96
7	41.829157	-83.947687	694.22	10.00	704.22
8	41.829189	-83.948341	692.86	10.00	702.86
9	41.829821	-83.949532	693.87	10.00	703.87
10	41.830484	-83.949886	695.07	10.00	705.07
11	41.831244	-83.951270	696.01	10.00	706.01
12	41.832065	-83.951286	697.95	10.00	707.95

Name: PV array 12
Footprint area: 96.5 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.835821	-83.991134	724.78	10.00	734.78
2	41.835952	-83.988720	720.47	10.00	730.47
3	41.836052	-83.986478	717.99	10.00	727.99
4	41.837819	-83.986220	717.60	10.00	727.60
5	41.838326	-83.983833	714.58	10.00	724.58
6	41.838706	-83.981746	712.70	10.00	722.70
7	41.837371	-83.981746	714.74	10.00	724.74
8	41.837355	-83.978613	712.74	10.00	722.74
9	41.836596	-83.978646	712.90	10.00	722.90
10	41.836588	-83.981821	714.42	10.00	724.42
11	41.835275	-83.981768	713.93	10.00	723.93
12	41.834058	-83.981736	712.34	10.00	722.34
13	41.832839	-83.981693	714.24	10.00	724.24
14	41.832767	-83.984938	715.53	10.00	725.53
15	41.832787	-83.987891	718.02	10.00	728.02
16	41.832727	-83.991016	722.04	10.00	732.04
17	41.834194	-83.991075	722.04	10.00	732.04

Name: PV array 13
Footprint area: 136.0 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.876609	-83.976280	728.53	10.00	738.53
2	41.876571	-83.972997	722.63	10.00	732.63
3	41.876565	-83.969757	720.59	10.00	730.59
4	41.876551	-83.966485	717.96	10.00	727.96
5	41.876522	-83.963363	719.10	10.00	729.10
6	41.875455	-83.963374	717.93	10.00	727.93
7	41.874387	-83.963336	715.91	10.00	725.91
8	41.873350	-83.963299	718.02	10.00	728.02
9	41.873336	-83.965176	717.54	10.00	727.54
10	41.873322	-83.967075	717.89	10.00	727.89
11	41.873308	-83.968942	720.22	10.00	730.22
12	41.873294	-83.970916	720.44	10.00	730.44
13	41.872133	-83.970845	721.00	10.00	731.00
14	41.870972	-83.970775	721.48	10.00	731.48
15	41.870900	-83.973210	719.27	10.00	729.27
16	41.870860	-83.975667	720.70	10.00	730.70
17	41.870828	-83.978499	731.97	10.00	741.97
18	41.871858	-83.978124	731.32	10.00	741.32
19	41.872969	-83.977641	726.08	10.00	736.08
20	41.872985	-83.975860	723.79	10.00	733.79
21	41.873001	-83.974143	722.13	10.00	732.13
22	41.873352	-83.974165	721.60	10.00	731.60
23	41.873336	-83.975828	723.43	10.00	733.43
24	41.873320	-83.977577	726.77	10.00	736.77
25	41.874806	-83.977040	730.28	10.00	740.28
26	41.875318	-83.976547	727.53	10.00	737.53
27	41.876069	-83.976311	727.59	10.00	737.59

Name: PV array 14
Footprint area: 106.9 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.876827	-83.962771	719.32	10.00	729.32
2	41.876787	-83.962052	718.35	10.00	728.35
3	41.876604	-83.962041	718.96	10.00	728.96
4	41.876524	-83.960078	715.42	10.00	725.42
5	41.875653	-83.959756	715.64	10.00	725.64
6	41.874455	-83.959627	716.97	10.00	726.97
7	41.873664	-83.958168	709.88	10.00	719.88
8	41.874199	-83.956870	712.66	10.00	722.66
9	41.873512	-83.955566	711.96	10.00	721.96
10	41.872921	-83.954435	706.91	10.00	716.91
11	41.871802	-83.954408	710.39	10.00	720.39
12	41.870844	-83.954424	708.95	10.00	718.95
13	41.870820	-83.955143	715.24	10.00	725.24
14	41.869581	-83.955121	713.87	10.00	723.87
15	41.869577	-83.956666	713.13	10.00	723.13
16	41.869573	-83.958254	715.08	10.00	725.08
17	41.868239	-83.958265	715.44	10.00	725.44
18	41.868207	-83.960298	715.55	10.00	725.55
19	41.868175	-83.962546	715.51	10.00	725.51
20	41.869102	-83.962578	714.41	10.00	724.41
21	41.870205	-83.962224	716.47	10.00	726.47
22	41.871659	-83.962224	716.67	10.00	726.67
23	41.873145	-83.962696	717.29	10.00	727.29
24	41.874698	-83.962733	718.04	10.00	728.04
25	41.875715	-83.962752	718.90	10.00	728.90

Name: PV array 15
Footprint area: 16.9 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.869022	-83.967481	716.30	10.00	726.30
2	41.869070	-83.964981	714.14	10.00	724.14
3	41.868575	-83.964477	715.10	10.00	725.10
4	41.867296	-83.964477	713.23	10.00	723.23
5	41.866298	-83.964906	713.68	10.00	723.68
6	41.866529	-83.966150	715.58	10.00	725.58
7	41.866793	-83.967610	715.15	10.00	725.15
8	41.867892	-83.967545	715.53	10.00	725.53

Name: PV array 16
Footprint area: 47.7 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.839753	-83.977171	713.77	10.00	723.77
2	41.839749	-83.975584	711.61	10.00	721.61
3	41.839745	-83.974082	709.15	10.00	719.15
4	41.839338	-83.974457	710.31	10.00	720.31
5	41.838538	-83.974446	712.34	10.00	722.34
6	41.837739	-83.974242	712.05	10.00	722.05
7	41.837124	-83.973760	712.31	10.00	722.31
8	41.836572	-83.973352	710.99	10.00	720.99
9	41.835989	-83.973685	710.52	10.00	720.52
10	41.835437	-83.973609	710.49	10.00	720.49
11	41.834949	-83.973341	709.92	10.00	719.92
12	41.834038	-83.973331	706.96	10.00	716.96
13	41.833758	-83.973599	705.99	10.00	715.99
14	41.833455	-83.973856	705.86	10.00	715.86
15	41.833010	-83.973979	707.30	10.00	717.30
16	41.833010	-83.975159	706.29	10.00	716.29
17	41.833422	-83.975180	708.62	10.00	718.62
18	41.833414	-83.976967	707.11	10.00	717.11
19	41.834687	-83.976986	708.74	10.00	718.74
20	41.836024	-83.977048	710.70	10.00	720.70
21	41.837108	-83.977089	711.65	10.00	721.65
22	41.838352	-83.977131	712.42	10.00	722.42

Name: PV array 17
Footprint area: 1.3 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.839741	-83.972751	708.58	10.00	718.58
2	41.839721	-83.972076	707.14	10.00	717.14
3	41.838898	-83.972054	707.64	10.00	717.64
4	41.838898	-83.972762	707.62	10.00	717.62

Name: PV array 18
Footprint area: 7.4 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.854454	-83.960431	710.35	10.00	720.35
2	41.854444	-83.959790	710.31	10.00	720.31
3	41.854434	-83.959213	709.91	10.00	719.91
4	41.854665	-83.959192	710.49	10.00	720.49
5	41.854657	-83.957974	712.10	10.00	722.10
6	41.853842	-83.957990	711.29	10.00	721.29
7	41.853043	-83.957995	710.06	10.00	720.06
8	41.853057	-83.958736	709.85	10.00	719.85
9	41.853071	-83.959540	709.42	10.00	719.42
10	41.853479	-83.959514	710.08	10.00	720.08
11	41.853487	-83.960452	710.84	10.00	720.84
12	41.853966	-83.960442	710.50	10.00	720.50

Name: PV array 19
Footprint area: 29.6 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.847297	-83.958844	703.82	10.00	713.82
2	41.847289	-83.956492	704.57	10.00	714.57
3	41.847301	-83.954726	706.00	10.00	716.00
4	41.847313	-83.953024	706.90	10.00	716.90
5	41.846266	-83.952989	706.58	10.00	716.58
6	41.845331	-83.952954	703.29	10.00	713.29
7	41.844005	-83.952927	702.61	10.00	712.61
8	41.843997	-83.954204	699.96	10.00	709.96
9	41.844492	-83.954998	701.01	10.00	711.01
10	41.845403	-83.956875	700.91	10.00	710.91
11	41.845827	-83.957701	699.64	10.00	709.64

Name: PV array 2
Footprint area: 88.3 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.883104	-83.973461	725.53	10.00	735.53
2	41.882952	-83.973075	725.20	10.00	735.20
3	41.882809	-83.971359	721.88	10.00	731.88
4	41.881794	-83.970586	719.23	10.00	729.23
5	41.881419	-83.970071	721.79	10.00	731.79
6	41.880963	-83.970028	721.72	10.00	731.72
7	41.880045	-83.969814	722.02	10.00	732.02
8	41.879286	-83.969213	721.32	10.00	731.32
9	41.878699	-83.968312	716.98	10.00	726.98
10	41.878319	-83.968317	718.31	10.00	728.31
11	41.878299	-83.968000	715.80	10.00	725.80
12	41.878543	-83.967984	713.18	10.00	723.18
13	41.878044	-83.966069	719.71	10.00	729.71
14	41.877712	-83.964546	717.78	10.00	727.78
15	41.877273	-83.964556	717.90	10.00	727.90
16	41.877287	-83.966077	719.91	10.00	729.91
17	41.877301	-83.967598	718.50	10.00	728.50
18	41.877057	-83.967614	717.85	10.00	727.85
19	41.877019	-83.969615	720.93	10.00	730.93
20	41.876997	-83.971659	721.72	10.00	731.72
21	41.876951	-83.973585	723.04	10.00	733.04
22	41.876961	-83.975961	727.19	10.00	737.19
23	41.877529	-83.975929	728.16	10.00	738.16
24	41.878144	-83.975897	729.27	10.00	739.27
25	41.878839	-83.975725	729.62	10.00	739.62
26	41.879590	-83.975575	730.11	10.00	740.11
27	41.880660	-83.975532	733.18	10.00	743.18
28	41.881738	-83.975489	735.64	10.00	745.64
29	41.882545	-83.974738	728.01	10.00	738.01

Name: PV array 3
Footprint area: 13.4 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.864368	-83.957568	712.62	10.00	722.62
2	41.865526	-83.957589	713.54	10.00	723.54
3	41.865414	-83.955792	714.19	10.00	724.19
4	41.865366	-83.954167	714.09	10.00	724.09
5	41.865095	-83.954177	713.90	10.00	723.90
6	41.865087	-83.953544	713.82	10.00	723.82
7	41.863425	-83.953523	712.35	10.00	722.35
8	41.863896	-83.955545	712.04	10.00	722.04

Name: PV array 4
Footprint area: 21.1 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.865354	-83.964956	713.47	10.00	723.47
2	41.865339	-83.964574	715.19	10.00	725.19
3	41.865164	-83.964571	714.81	10.00	724.81
4	41.865120	-83.963457	715.15	10.00	725.15
5	41.864844	-83.963248	714.95	10.00	724.95
6	41.863606	-83.963245	713.93	10.00	723.93
7	41.862399	-83.963242	713.69	10.00	723.69
8	41.862403	-83.964240	713.74	10.00	723.74
9	41.862619	-83.964240	713.91	10.00	723.91
10	41.862623	-83.965131	713.58	10.00	723.58
11	41.862176	-83.965131	713.02	10.00	723.02
12	41.862136	-83.967298	711.65	10.00	721.65
13	41.863526	-83.966998	712.49	10.00	722.49
14	41.864285	-83.966268	712.81	10.00	722.81
15	41.864525	-83.965667	714.73	10.00	724.73

Name: PV array 5
Footprint area: 27.1 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.862235	-83.962602	713.47	10.00	723.47
2	41.863422	-83.962640	713.98	10.00	723.98
3	41.864736	-83.962677	714.91	10.00	724.91
4	41.864724	-83.961969	714.30	10.00	724.30
5	41.864481	-83.961969	713.79	10.00	723.79
6	41.864429	-83.960816	714.35	10.00	724.35
7	41.863640	-83.957612	711.75	10.00	721.75
8	41.862883	-83.954537	713.30	10.00	723.30
9	41.862520	-83.954532	712.35	10.00	722.35
10	41.862528	-83.958341	712.27	10.00	722.27
11	41.862248	-83.958341	711.75	10.00	721.75
12	41.862242	-83.960429	713.05	10.00	723.05

Name: PV array 6
Footprint area: 128.1 acres
Axis tracking: Single-axis rotation
Backtracking: Shade
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.861494	-83.966800	711.99	10.00	721.99
2	41.861492	-83.966062	711.74	10.00	721.74
3	41.860896	-83.965570	711.30	10.00	721.30
4	41.860907	-83.964145	712.85	10.00	722.85
5	41.861482	-83.963465	712.73	10.00	722.73
6	41.861498	-83.962996	713.11	10.00	723.11
7	41.859842	-83.962964	712.25	10.00	722.25
8	41.858378	-83.962932	710.87	10.00	720.87
9	41.856738	-83.962921	711.26	10.00	721.26
10	41.855290	-83.962867	710.51	10.00	720.51
11	41.855382	-83.963726	709.29	10.00	719.29
12	41.855306	-83.964552	711.32	10.00	721.32
13	41.854701	-83.964740	709.25	10.00	719.25
14	41.854110	-83.964738	708.15	10.00	718.15
15	41.853584	-83.964510	707.69	10.00	717.69
16	41.852371	-83.964505	707.68	10.00	717.68
17	41.851206	-83.964479	706.60	10.00	716.60
18	41.851156	-83.965953	707.52	10.00	717.52
19	41.851107	-83.967533	706.77	10.00	716.77
20	41.849818	-83.966351	708.31	10.00	718.31
21	41.849680	-83.964471	708.43	10.00	718.43
22	41.848617	-83.964474	706.95	10.00	716.95
23	41.847682	-83.964455	705.88	10.00	715.88
24	41.847666	-83.965904	707.96	10.00	717.96
25	41.848441	-83.966826	708.90	10.00	718.90
26	41.849232	-83.967770	709.68	10.00	719.68
27	41.850016	-83.968725	712.09	10.00	722.09
28	41.850799	-83.969680	712.50	10.00	722.50
29	41.851750	-83.969739	710.43	10.00	720.43
30	41.852749	-83.969756	710.10	10.00	720.10
31	41.852741	-83.971140	711.17	10.00	721.17
32	41.853612	-83.971162	712.41	10.00	722.41
33	41.854564	-83.971185	712.29	10.00	722.29
34	41.854572	-83.969635	711.13	10.00	721.13
35	41.854248	-83.969655	710.61	10.00	720.61
36	41.854278	-83.968468	709.21	10.00	719.21
37	41.854308	-83.967367	708.38	10.00	718.38
38	41.856195	-83.967456	712.33	10.00	722.33
39	41.857130	-83.967500	710.98	10.00	720.98
40	41.858146	-83.967544	711.40	10.00	721.40
41	41.859499	-83.967532	710.68	10.00	720.68
42	41.860012	-83.967011	710.74	10.00	720.74
43	41.860620	-83.966812	708.27	10.00	718.27

Name: PV array 7
Footprint area: 151.3 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.861228	-83.962554	712.93	10.00	722.93
2	41.861212	-83.961524	712.75	10.00	722.75
3	41.861655	-83.961535	713.03	10.00	723.03
4	41.861719	-83.958338	711.96	10.00	721.96
5	41.861783	-83.955183	712.22	10.00	722.22
6	41.861204	-83.954762	712.02	10.00	722.02
7	41.860898	-83.953972	711.78	10.00	721.78
8	41.860864	-83.952603	711.16	10.00	721.16
9	41.859734	-83.952565	711.43	10.00	721.43
10	41.858731	-83.952528	709.30	10.00	719.30
11	41.858363	-83.952871	711.87	10.00	721.87
12	41.856765	-83.952742	710.54	10.00	720.54
13	41.856158	-83.951069	710.38	10.00	720.38
14	41.855207	-83.951029	710.47	10.00	720.47
15	41.854959	-83.951369	710.35	10.00	720.35
16	41.853025	-83.951369	709.90	10.00	719.90
17	41.853021	-83.948703	708.46	10.00	718.46
18	41.853017	-83.946209	706.75	10.00	716.75
19	41.853013	-83.943714	705.72	10.00	715.72
20	41.853009	-83.941306	705.75	10.00	715.75
21	41.851247	-83.940458	704.54	10.00	714.54
22	41.851215	-83.939455	703.69	10.00	713.69
23	41.850356	-83.939433	703.71	10.00	713.71
24	41.850368	-83.941330	704.04	10.00	714.04
25	41.850380	-83.943312	704.84	10.00	714.84
26	41.851747	-83.943323	704.41	10.00	714.41
27	41.851798	-83.945354	705.76	10.00	715.76
28	41.851913	-83.947771	706.21	10.00	716.21
29	41.851425	-83.947713	706.51	10.00	716.51
30	41.851407	-83.949551	708.20	10.00	718.20
31	41.851251	-83.949545	708.88	10.00	718.88
32	41.851227	-83.951219	710.01	10.00	720.01
33	41.851203	-83.952850	711.53	10.00	721.53
34	41.853123	-83.952906	711.25	10.00	721.25
35	41.855043	-83.952962	711.07	10.00	721.07
36	41.855035	-83.954207	711.97	10.00	721.97
37	41.857019	-83.954258	712.76	10.00	722.76
38	41.859098	-83.954352	712.16	10.00	722.16
39	41.859130	-83.956047	711.52	10.00	721.52
40	41.859802	-83.956240	711.66	10.00	721.66
41	41.859818	-83.958751	710.96	10.00	720.96
42	41.858459	-83.958772	711.02	10.00	721.02
43	41.857692	-83.959437	709.50	10.00	719.50
44	41.857724	-83.960532	710.67	10.00	720.67
45	41.856242	-83.960591	710.10	10.00	720.10
46	41.854578	-83.960666	708.20	10.00	718.20
47	41.854602	-83.961696	709.00	10.00	719.00
48	41.854622	-83.962517	711.06	10.00	721.06
49	41.856250	-83.962526	710.85	10.00	720.85
50	41.857877	-83.962535	710.20	10.00	720.20
51	41.859409	-83.962523	711.93	10.00	721.93

Name: PV array 8
Footprint area: 28.6 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.846181	-83.962451	706.50	10.00	716.50
2	41.846173	-83.961652	707.24	10.00	717.24
3	41.845749	-83.961646	706.32	10.00	716.32
4	41.845753	-83.960048	707.09	10.00	717.09
5	41.847328	-83.960085	705.01	10.00	715.01
6	41.847322	-83.958983	702.17	10.00	712.17
7	41.846761	-83.958750	704.99	10.00	714.99
8	41.846432	-83.958378	704.64	10.00	714.64
9	41.845743	-83.957899	703.93	10.00	713.93
10	41.845334	-83.957226	703.55	10.00	713.55
11	41.844766	-83.955901	702.92	10.00	712.92
12	41.843991	-83.954329	699.73	10.00	709.73
13	41.843991	-83.956877	705.23	10.00	715.23
14	41.843979	-83.958795	706.52	10.00	716.52
15	41.843967	-83.960885	703.76	10.00	713.76
16	41.844778	-83.961636	706.29	10.00	716.29
17	41.845653	-83.962451	704.98	10.00	714.98

Name: PV array 9
Footprint area: 21.1 acres
Axis tracking: Single-axis rotation
Backtracking: Shade-slope
Tracking axis orientation: 180.0 deg
Maximum tracking angle: 60.0 deg
Resting angle: 0.0 deg
Ground Coverage Ratio: 0.5
Rated power: -
Panel material: Smooth glass with AR coating
Vary reflectivity with sun position? Yes
Correlate slope error with surface type? Yes
Slope error: 8.43 mrad



Vertex	Latitude	Longitude	Ground elevation	Height above ground	Total elevation
	deg	deg	ft	ft	ft
1	41.833509	-83.942937	698.65	10.00	708.65
2	41.833525	-83.943538	697.97	10.00	707.97
3	41.834083	-83.944491	698.14	10.00	708.14
4	41.834672	-83.945487	698.30	10.00	708.30
5	41.835258	-83.946479	698.41	10.00	708.41
6	41.835851	-83.947480	695.76	10.00	705.76
7	41.836423	-83.947464	695.57	10.00	705.57
8	41.836419	-83.946359	699.54	10.00	709.54
9	41.836706	-83.946348	698.30	10.00	708.30
10	41.836708	-83.945489	699.53	10.00	709.53
11	41.836710	-83.944629	699.68	10.00	709.68
12	41.836712	-83.943802	699.87	10.00	709.87
13	41.836714	-83.942974	698.86	10.00	708.86
14	41.835863	-83.942966	698.91	10.00	708.91
15	41.835020	-83.942958	699.27	10.00	709.27
16	41.834248	-83.942947	699.03	10.00	709.03

Discrete Observation Receptors

Number	Latitude	Longitude	Ground elevation	Height above ground	Total Elevation
	deg	deg	ft	ft	ft
OP 1	41.875301	-83.977223	736.14	6.00	742.14
OP 2	41.861831	-83.962741	713.53	6.00	719.53
OP 3	41.876900	-83.963286	719.31	6.00	725.31
OP 4	41.831238	-83.981496	716.46	6.00	722.46
OP 5	41.863588	-83.955342	714.09	6.00	720.09

Obstruction Components

Name: Proposed Screening

Upper edge height: 8.0 ft



Google Imagery ©2025 Maxar Technologies, USDA/FPAC/GEO

Vertex	Latitude	Longitude	Ground elevation
	deg	deg	ft
1	41.862099	-83.967319	711.59
2	41.861963	-83.967309	712.16
3	41.862027	-83.962964	714.08
4	41.862211	-83.962964	713.56
5	41.862099	-83.967319	711.59

Name: Proposed Screening

Upper edge height: 8.0 ft



Google Imagery ©2025 Maxar Technologies, USDA/FPAC/GEO

Vertex	Latitude	Longitude	Ground elevation
	deg	deg	ft
1	41.861556	-83.963014	713.07
2	41.861526	-83.963013	713.11
3	41.861512	-83.963482	712.88
4	41.860942	-83.964140	712.86
5	41.861014	-83.964145	712.78
6	41.861542	-83.963509	713.11
7	41.861557	-83.963016	713.10

Name: Proposed Screening

Upper edge height: 8.0 ft



Google Imagery ©2025 Maxar Technologies, USDA/FPAC/GEO

Vertex	Latitude	Longitude	Ground elevation
	deg	deg	ft
1	41.876921	-83.982165	736.86
2	41.876849	-83.982171	736.79
3	41.876897	-83.978646	735.81
4	41.877776	-83.978024	735.37
5	41.877800	-83.978094	735.53
6	41.876941	-83.978683	735.86
7	41.876921	-83.982165	736.86

Name: Proposed Screening

Upper edge height: 8.0 ft



Google Imagery ©2025 Maxar Technologies, USDA/FPAC/GEO

Vertex	Latitude	Longitude	Ground elevation
	deg	deg	ft
1	41.874999	-83.977277	736.08
2	41.873329	-83.977813	729.03
3	41.873305	-83.977663	726.61
4	41.875015	-83.977116	732.06
5	41.874999	-83.977277	736.08

Name: Proposed Screening

Upper edge height: 8.0 ft



Vertex	Latitude	Longitude	Ground elevation
	deg	deg	ft
1	41.876633	-83.976359	729.15
2	41.876050	-83.976402	728.12
3	41.875330	-83.976626	728.13
4	41.874835	-83.977098	730.98
5	41.874931	-83.977195	732.87
6	41.875362	-83.976717	728.85
7	41.876065	-83.976471	728.60
8	41.876634	-83.976422	729.63
9	41.876633	-83.976359	729.15

Name: Proposed Screening

Upper edge height: 8.0 ft



Vertex	Latitude	Longitude	Ground elevation
	deg	deg	ft
1	41.878144	-83.975990	729.99
2	41.878144	-83.975920	729.40
3	41.876942	-83.975990	727.39
4	41.876954	-83.976070	727.92
5	41.878144	-83.975990	729.99

Summary of PV Glare Analysis

PV configuration and total predicted glare

PV Name	Tilt	Orientation	"Green" Glare	"Yellow" Glare	Energy Produced	Data File
	deg	deg	min	min	kWh	
PV array 1	SA tracking	SA tracking	0	0	-	-
PV array 10	SA tracking	SA tracking	0	0	-	-
PV array 11	SA tracking	SA tracking	0	0	-	-
PV array 12	SA tracking	SA tracking	0	0	-	-
PV array 13	SA tracking	SA tracking	160	0	-	-
PV array 14	SA tracking	SA tracking	0	0	-	-
PV array 15	SA tracking	SA tracking	0	0	-	-
PV array 16	SA tracking	SA tracking	691	67	-	-
PV array 17	SA tracking	SA tracking	0	0	-	-
PV array 18	SA tracking	SA tracking	0	0	-	-
PV array 19	SA tracking	SA tracking	0	0	-	-
PV array 2	SA tracking	SA tracking	469	420	-	-
PV array 3	SA tracking	SA tracking	181	0	-	-
PV array 4	SA tracking	SA tracking	0	0	-	-
PV array 5	SA tracking	SA tracking	0	0	-	-
PV array 6	SA tracking	SA tracking	0	0	-	-
PV array 7	SA tracking	SA tracking	0	0	-	-
PV array 8	SA tracking	SA tracking	0	0	-	-
PV array 9	SA tracking	SA tracking	2,427	0	-	-

Distinct glare per month

Excludes overlapping glare from PV array for multiple receptors at matching time(s)

PV	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
pv-array-13 (green)	0	0	0	0	21	93	46	0	0	0	0	0
pv-array-13 (yellow)	0	0	0	0	0	0	0	0	0	0	0	0
pv-array-16 (green)	0	0	0	0	239	187	239	26	0	0	0	0
pv-array-16 (yellow)	0	0	0	0	0	67	0	0	0	0	0	0
pv-array-2 (green)	0	0	6	45	114	114	88	102	0	0	0	0
pv-array-2 (yellow)	0	0	0	10	154	71	84	101	0	0	0	0
pv-array-3 (green)	21	0	0	0	0	0	0	0	0	0	0	160
pv-array-3 (yellow)	0	0	0	0	0	0	0	0	0	0	0	0
pv-array-9 (green)	589	0	0	0	0	0	0	0	0	0	316	930
pv-array-9 (yellow)	0	0	0	0	0	0	0	0	0	0	0	0

PV & Receptor Analysis Results

Results for each PV array and receptor

PV array 1 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 10 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 11 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 12 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 13 low potential for temporary after-image

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	160	0

PV array 13: OP 1

No glare found

PV array 13: OP 2

No glare found

PV array 13: OP 3

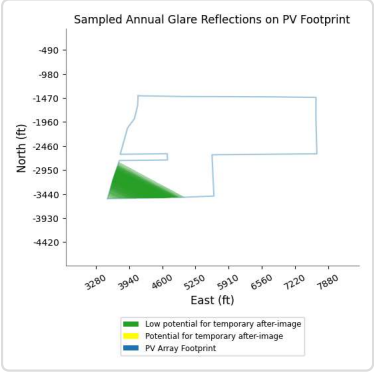
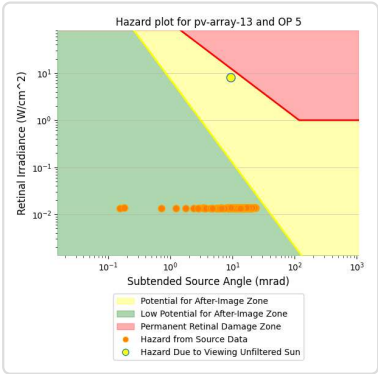
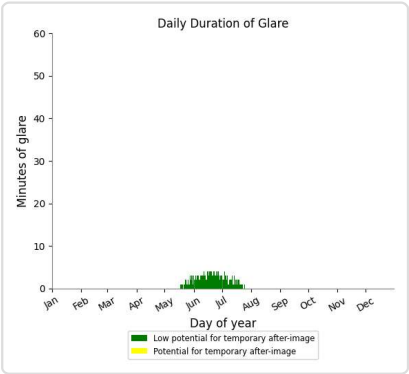
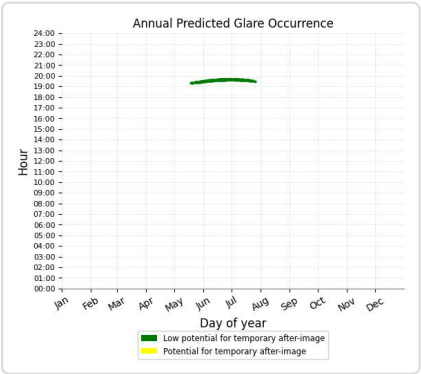
No glare found

PV array 13: OP 4

No glare found

PV array 13: OP 5

- PV array is expected to produce the following glare for this receptor:
- 160 minutes of "green" glare with low potential to cause temporary after-image.
 - 0 minutes of "yellow" glare with potential to cause temporary after-image.



PV array 14 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 15 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 16 potential temporary after-image

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	691	67
OP: OP 5	0	0

PV array 16: OP 1

No glare found

PV array 16: OP 2

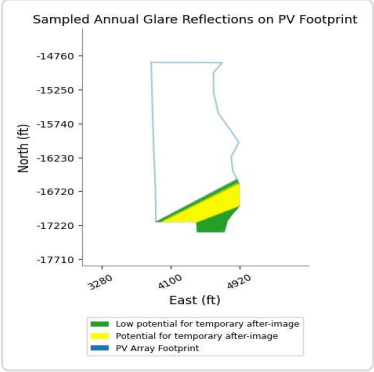
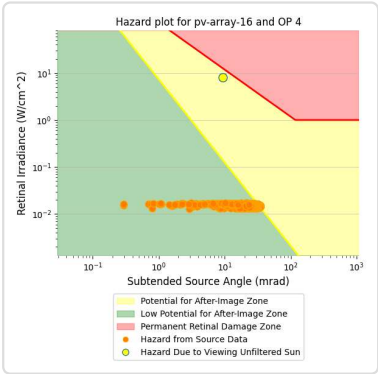
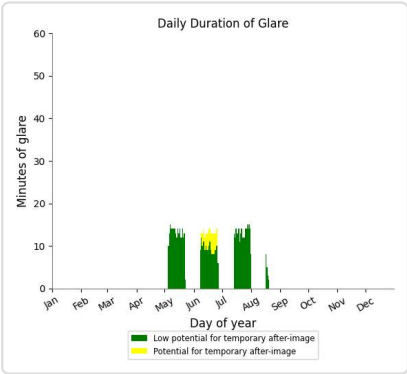
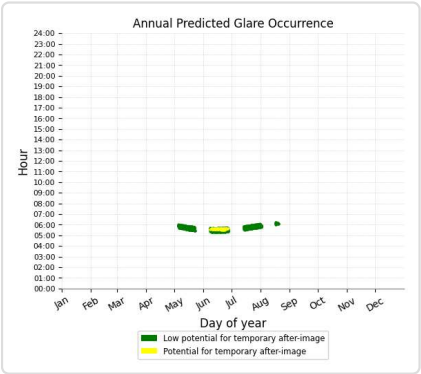
No glare found

PV array 16: OP 3

No glare found

PV array 16: OP 4

- PV array is expected to produce the following glare for this receptor:
- 691 minutes of "green" glare with low potential to cause temporary after-image.
 - 67 minutes of "yellow" glare with potential to cause temporary after-image.



PV array 16: OP 5

No glare found

PV array 17 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 18 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 19 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 2 potential temporary after-image

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	469	420
OP: OP 4	0	0
OP: OP 5	0	0

PV array 2: OP 1

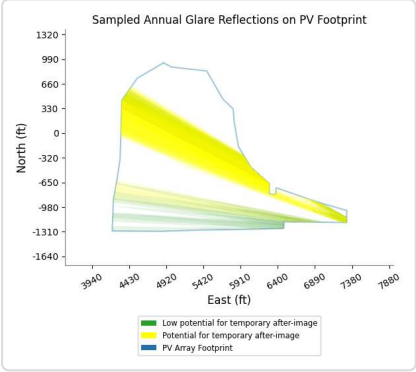
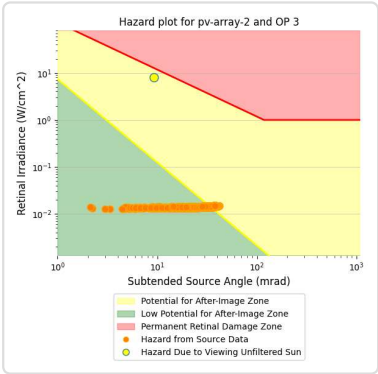
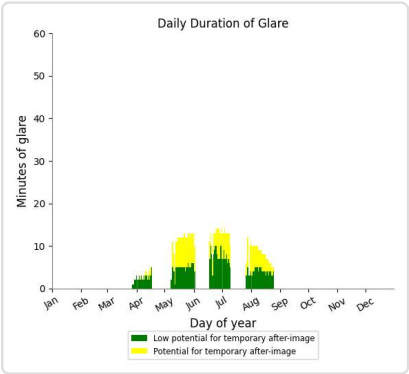
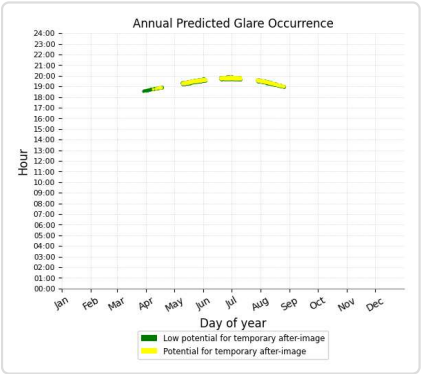
No glare found

PV array 2: OP 2

No glare found

PV array 2: OP 3

- PV array is expected to produce the following glare for this receptor:
- 469 minutes of "green" glare with low potential to cause temporary after-image.
 - 420 minutes of "yellow" glare with potential to cause temporary after-image.



PV array 2: OP 4

No glare found

PV array 2: OP 5

No glare found

PV array 3 low potential for temporary after-image

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	181	0
OP: OP 4	0	0
OP: OP 5	0	0

PV array 3: OP 1

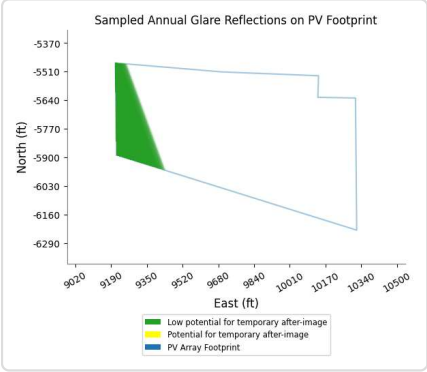
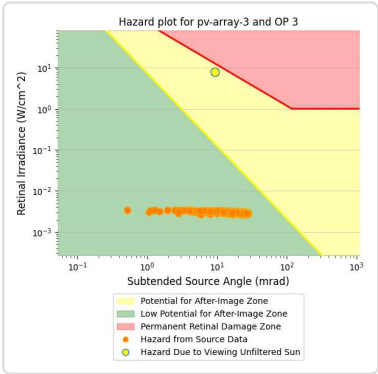
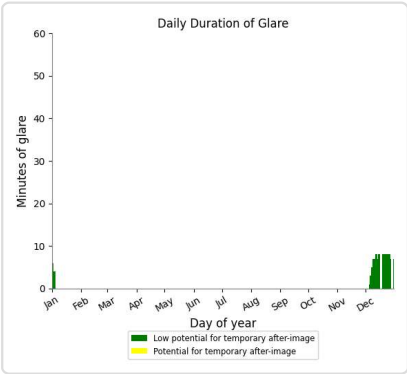
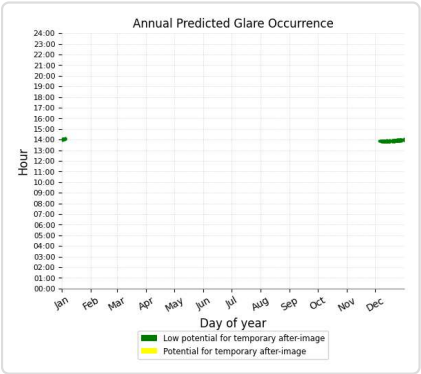
No glare found

PV array 3: OP 2

No glare found

PV array 3: OP 3

- PV array is expected to produce the following glare for this receptor:
- 181 minutes of "green" glare with low potential to cause temporary after-image.
 - 0 minutes of "yellow" glare with potential to cause temporary after-image.



PV array 3: OP 4

No glare found

PV array 3: OP 5

No glare found

PV array 4 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 5 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 6 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 7 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 8 no glare found

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	0	0
OP: OP 4	0	0
OP: OP 5	0	0

No glare found

PV array 9 low potential for temporary after-image

Component	Green glare (min)	Yellow glare (min)
OP: OP 1	0	0
OP: OP 2	0	0
OP: OP 3	710	0
OP: OP 4	0	0
OP: OP 5	1717	0

PV array 9: OP 1

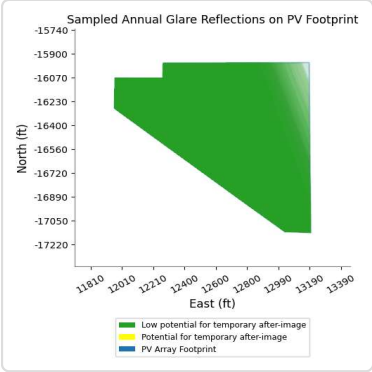
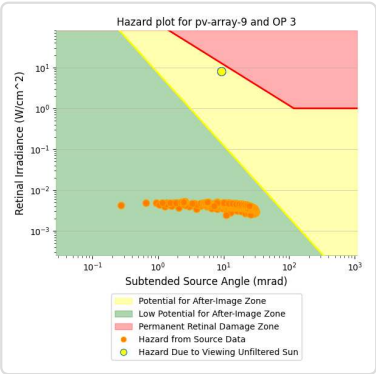
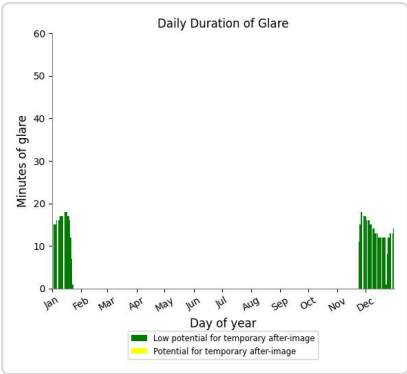
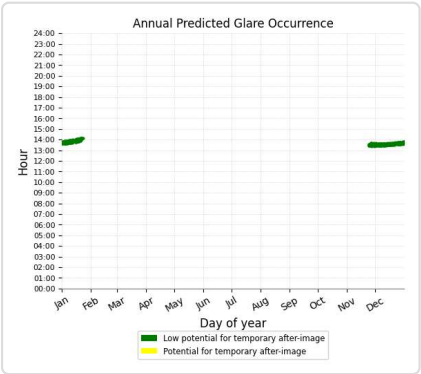
No glare found

PV array 9: OP 2

No glare found

PV array 9: OP 3

- PV array 9 is expected to produce the following glare for this receptor:
- 710 minutes of "green" glare with low potential to cause temporary after-image.
 - 0 minutes of "yellow" glare with potential to cause temporary after-image.



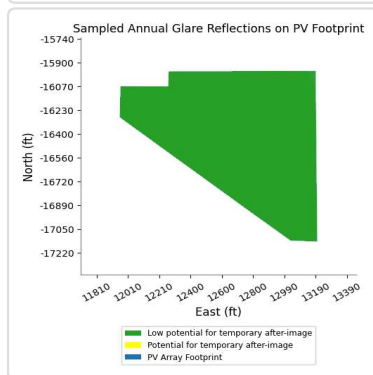
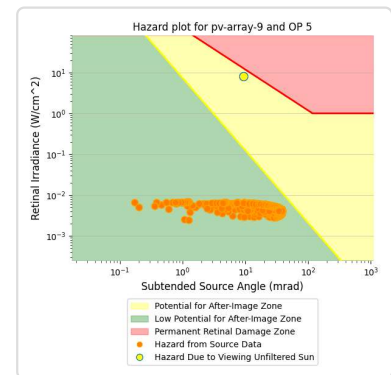
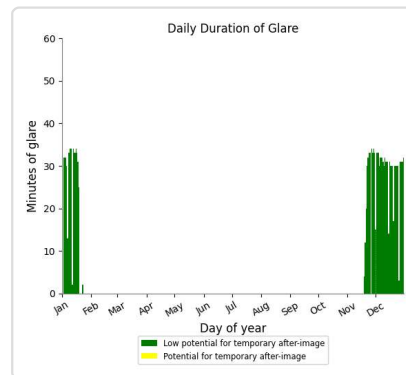
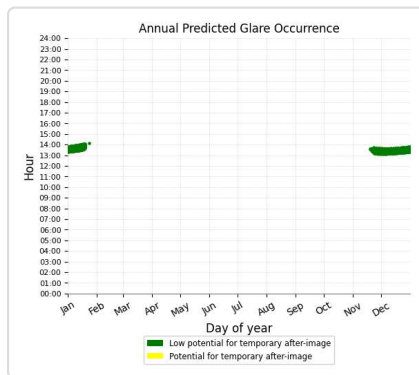
PV array 9: OP 4

No glare found

PV array 9: OP 5

PV array is expected to produce the following glare for this receptor:

- 1,717 minutes of "green" glare with low potential to cause temporary after-image.
- 0 minutes of "yellow" glare with potential to cause temporary after-image.



Summary of Vertical Surface Glare Analysis

Assumptions

- Times associated with glare are denoted in Standard time. For Daylight Savings, add one hour.
- Glare analyses do not automatically account for physical obstructions between reflectors and receptors. This includes buildings, tree cover and geographical obstructions.
- Detailed system geometry is not rigorously simulated.
- The glare hazard determination relies on several approximations including observer eye characteristics, angle of view, and typical blink response time. Actual values and results may vary.
- The system output calculation is a DNI-based approximation that assumes clear, sunny skies year-round. It should not be used in place of more rigorous modeling methods.
- Several V1 calculations utilize the PV array centroid, rather than the actual glare spot location, due to algorithm limitations. This may affect results for large PV footprints. Additional analyses of array sub-sections can provide additional information on expected glare.
- The subtended source angle (glare spot size) is constrained by the PV array footprint size. Partitioning large arrays into smaller sections will reduce the maximum potential subtended angle, potentially impacting results if actual glare spots are larger than the sub-array size. Additional analyses of the combined area of adjacent sub-arrays can provide more information on potential glare hazards. (See previous point on related limitations.)
- Hazard zone boundaries shown in the Glare Hazard plot are an approximation and visual aid. Actual ocular impact outcomes encompass a continuous, not discrete, spectrum.
- Glare locations displayed on receptor plots are approximate. Actual glare-spot locations may differ.
- Refer to the **Help page** for detailed assumptions and limitations not listed here.

APPENDIX B

TRAFFIC ANALYSIS

The logo for SWCA is positioned vertically on the left side of the page. It consists of the letters 'S', 'W', 'C', and 'A' stacked vertically in a large, light blue, serif font. The 'S' and 'W' are partially cut off by the left edge of the page.

Traffic Plan for the Rouget Road Solar Project, Lenawee County, Michigan: Exhibit A-1.3

SEPTEMBER 2026

PREPARED FOR

Rouget Road Solar Farm, LLC

353 North Clark Street, 30th Floor
Chicago, Illinois 60654

PREPARED BY

SWCA Environmental Consultants

200 West 22nd Street, Suite 220
Lombard, Illinois 60148

TRAFFIC PLAN FOR THE ROUGET ROAD SOLAR PROJECT, LENAWEE COUNTY, MICHIGAN

Prepared for

Rouget Road Solar Farm, LLC
353 North Clark Street, 30th Floor
Chicago, Illinois 60654

Prepared by

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SWCA Project No. 78878

September 2026

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1 PROJECT OVERVIEW

The Rouget Road Solar Project ("the Project") is a proposed utility-scale solar energy generation facility being developed by Rouget Road Solar Farm, LLC ("Applicant" or "Rouget Road Solar") located in Lenawee County, southeast of the City of Adrian, Michigan. The Project will occupy predominantly agricultural land and will include photovoltaic (PV) arrays, associated inverters, access roads, and electrical collection systems.

Primary construction access to the site will be provided via Myers Highway and Humphrey Highway, with construction traffic utilizing regional routes including State Route 52 (to the west), State Route 50 (to the north), and US-23 (to the east). These major highways will facilitate the movement of construction materials, equipment, and personnel to the site.

This Traffic Assessment Plan has been developed in accordance with the Michigan Public Service Commission ("MPSC") Certificate of Necessity Application Filing Instructions and Procedures, dated October 10, 2024. The purpose of this plan is to evaluate and address potential impacts of construction- and operation-related traffic on local and regional transportation infrastructure. The plan outlines proposed mitigation measures to minimize disruptions to local communities, ensure road safety, and protect the integrity of public infrastructure.

Subsequent sections of this assessment will address anticipated traffic volumes, proposed haul routes, construction phasing, coordination with local transportation agencies, and best practices for minimizing traffic-related impacts during both construction and operational phases of the Project.

2 TRANSPORTATION CONTEXT AND ACCESS ROUTES

2.1 Regional Access Routes

Project components and construction traffic will utilize a network of state and county roads connecting these major highways to the site (Figure 1). Specific routing details will depend on contractor staging areas and final delivery logistics.

2.1.1 Interstate 475 or Interstate 75

Interstate 475 ("I-475") is a 4 lane, divided major interstate highway in Ohio that persists for approximately 17 miles. It runs north-south and serves as an auxiliary bypass for Interstate 75 ("I-75"). This highway is located approximately 19 miles from the Project. From I-475, vehicles will use US- 223, a 1 to 2 lane paved maintained state road which intersects directly to the Project Area.

2.1.2 Interstate 94

Interstate 94 ("I-94") is a 4 lane, divided major interstate highway that runs east-west across the lower peninsula of Michigan. I-94 is approximately 30 miles from the Project. From I-94, Vehicles will exit to the south on M-52, a 1 to 2 lane paved maintained state road, vehicles will then turn east on US-223 a 1 to 2 lane paved maintained state road which intersects directly to the Project Area.

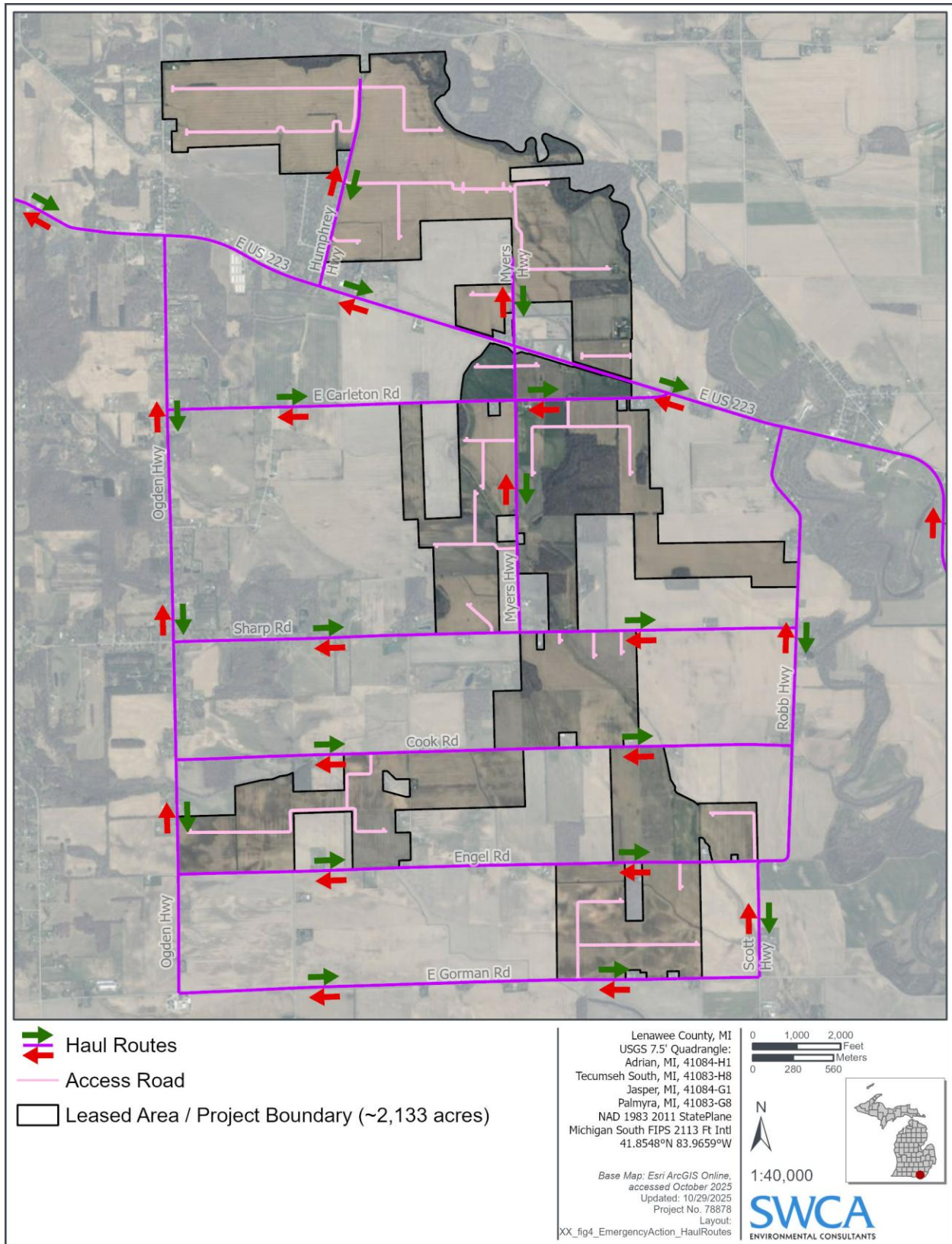


Figure 1. Proposed haul route for Rouget Road Solar.

2.1.3 Interstate 90

Interstate 90 ("I-90") is an interstate highway in Ohio that runs east-west and is a paved federally maintained 2 lane divided highway. From I-90, vehicles will turn north on Ohio Route 109 (in Ohio) which turns into M-52 (at the Michigan state line). From M-52, a 1 to 2 lane paved maintained state road, vehicles will then turn east onto US- 223, a 1 to 2 lane paved maintained state road which intersects directly to the Project Area.

2.2 Local Site Access

Entrances will be designed to accommodate heavy haul traffic and include stabilized construction entrances, signage, and traffic controls as required by the county road commission. The main site construction entrances are located on Myers Highway in the northwest corner of the Project and Humphrey Highway located in the southeast corner of the Project.

3 CONSTRUCTION TRAFFIC ASSESSMENT

3.1 Workforce Estimates

The size of the construction workforce is anticipated to range between 200 to 400 workers during the peak phases of construction activity. To accommodate this workforce and minimize potential impacts on local traffic, parking will be provided on-site. This will prevent roadside congestion and ensure the safety and accessibility of adjacent roadways.

3.2 Truck Traffic

Anticipated deliveries include solar modules, inverters, racking, fencing, concrete, and gravel. A breakdown of anticipated peak truck deliveries per day will be developed once procurement and logistics are finalized. An estimated 20 to 40 truck deliveries may occur each day.

3.3 Oversize/Overweight Loads

The project may require permits for oversize or overweight vehicles transporting large machinery (i.e. bulldozer, excavator, etc.) transformers, inverters, or other large components to the project site. Coordination with Michigan Department of Transportation ("MDOT") and county road commissions will be conducted to secure appropriate routing and approvals. This will be directly coordinated by Rouget Road Solar's Engineering, Procurement, and Construction ("EPC") contractor.

3.4 Roadway Weight Restrictions and Bridge Limitations

Construction traffic and delivery scheduling for the Project must account for statutory seasonal weight restrictions ("frost laws") and posted structure limitations administered by MDOT and the Lenawee County Road Commission ("LCRC"). Under Michigan law (MCL 257.722), seasonal weight restrictions are imposed each year during the spring thaw period, typically beginning in late February or March and remaining in effect until roadbeds regain stability. On MDOT state trunkline routes designated as "seasonal" on the MDOT Truck Operators Map, allowable axle loadings are reduced by 25% on rigid (concrete) pavements and 35% on flexible (asphalt) pavements; routes designated "all-

season" carry no reduction in legal axle weight. During the restriction period, MDOT does not issue single-trip permits for overweight loads or for loads exceeding 14 feet in width on restricted routes, a constraint directly relevant to delivery of the Project's main power transformer and other heavy components.

On LCRC-maintained county roads subject to seasonal restrictions, per-axle loading is reduced by 35% and speeds for vehicles over 10,000 pounds gross vehicle weight are reduced to a maximum of 35 miles per hour while restrictions are in effect. For reference, LCRC seasonal restrictions for the 2026 season were lifted effective March 16, 2026, and MDOT restrictions in southern Michigan were lifted in April 2026; the timing in any given construction year will be announced by each agency based on frost depth and weather conditions. LCRC administers transportation (oversize/overweight and seasonal) permits through the Oxcart Permit Systems online platform.

The LCRC list of roads subject to seasonal weight restrictions and the LCRC Truck Route Map were reviewed against the proposed haul routes shown in Figure 1. The regional delivery corridors serving the Project (US-223, M-52, and M-50) are state trunklines and LCRC-designated truck routes. Ogden Highway and Carleton Road are also identified as designated truck routes on the LCRC Truck Route Map. However, the majority of the local haul roads that provide direct access to Project entrances and internal delivery points are identified by LCRC as subject to seasonal weight restrictions, as summarized in Table 1.

Table 1. Seasonally Weight-Restricted Roads Along or Adjacent to Proposed Haul Routes

Road	Seasonally Restricted Segment (per LCRC)	Function in Proposed Haul Route Network
Myers Highway	Sharp Road north to dead end	Primary site access; northwest construction entrance
Humphrey Highway	US-223 to Deerfield Road	Primary site access; southeast construction entrance
East Carleton Road	M-52 to US-223	East–west haul route through the north-central Project Area
Sharp Road	Treat Highway to Robb Highway	East–west haul route through the central Project Area
Cook Road	Ogden Highway to Robb Highway	East–west haul route through the south-central Project Area
Engel Road	Ogden Highway to Robb Highway	East–west haul route through the southern Project Area
East Gorman Road	M-52 to Crockett Highway; Crockett Highway to Blissfield Village	East–west haul route along the southern Project boundary
Robb Highway	US-223 to Engel Road	North–south haul route along the eastern Project boundary
Scott Highway	Horton Road to Engel Road	North–south haul route in the southeast Project Area
Rau Highway	Engel Road to Sharp Road	Local north–south connector within the Project Area
Rouget Road	Rogers Highway to Deerfield Village limits	Project-vicinity local road east of the Project Area

Sources: LCRC, Roads Subject to Seasonal Weight Restrictions (2024) and LCRC Truck Route Map (2025)

Note: Ogden Highway, a designated LCRC truck route forming the western haul corridor, does not appear on the LCRC seasonal restriction list; its all-season status should be confirmed with LCRC prior to construction.

In addition to seasonal restrictions, the LCRC Restricted Roads and Bridges Map identifies posted (weight-limited) and closed structures, no-truck zones, and no-thru-truck roads countywide. Posted structures and truck prohibitions in the general Project vicinity are summarized in Table 2. Posted bridge limits on the LCRC map are expressed in tons and are tiered by vehicle configuration; the specific configuration classes associated with each posting should be confirmed with LCRC during final haul route engineering. Of particular note, the Village of Palmyra, located at the M-52/US-223 junction immediately northwest of the Project Area, is designated as a no-truck zone on village streets, and the posted Carleton Road bridge west of M-52 in Madison Charter Township limits the use of Carleton Road as a westerly through-route for

heavy loads. Neither of the two proposed construction entrances requires crossing a posted or closed structure when approached from US-223.

Table 2. Posted Bridges, Closures, and Truck Prohibitions in the Project Vicinity

Structure/Location	General Location	Posted Restriction (per LCRC map)	Relevance to Haul Routes
Village of Palmyra	M-52/US-223 junction, northwest of Project	No trucks (village streets)	Haul traffic must remain on US-223/M-52 trunklines; no cut-through movements
Carleton Road Bridge	Madison Charter Township, west of M-52	Posted: 42T / 49T / 54T	Limits westerly extension of Carleton Road as a through haul route beyond M-52
Treat Highway Bridge	Madison Charter Township/ Palmyra Township area	Posted: 42T / 55T / 62T	On Treat Highway corridor west of the Project; avoidable via US-223
Sandcreek Highway Bridge	Madison Charter Township	Posted: 7T	Severely restricted; not suitable for any construction traffic
Sandcreek Highway Bridge	Fairfield Township	Posted: 30T / 50T / 66T	Southwest of Project; outside proposed haul network
Raisin Center Highway Bridge	Raisin Township, north of Adrian	Posted: 42T / 59T / 79T	North of Project; outside proposed haul network
Carson Highway Bridge	Adrian vicinity	Posted: 28T / 31T / 41T	West of Project; outside proposed haul network
Townline Highway Bridge	Adrian vicinity	Bridge closed	West of Project; outside proposed haul network

Source: LCRC, Restricted Roads & Bridges Map (2025)

Notes:

Tiered postings correspond to vehicle configuration classes and should be verified with LCRC. Structure locations are approximate as depicted on the countywide map and should be field-verified during pre-construction route surveys.

T = tons

To address these constraints, the Project will implement the following measures. Heavy component deliveries, including the main power transformer and other overweight loads, will be scheduled outside of the annual seasonal weight restriction window to the extent practicable. Where deliveries over seasonally restricted county roads cannot be avoided, the EPC contractor will coordinate with LCRC in advance to determine whether reduced-loading configurations, transportation permits obtained through the Permit Systems platform, or a Project-specific road use agreement (including provisions for pre- and post-construction condition surveys and pavement restoration, consistent with Section 5) can accommodate the required movements. Haul routing will avoid the Village of Palmyra no-truck zone, the posted Carleton Road bridge west of M-52, and all closed or severely posted structures identified on the LCRC Restricted Roads and Bridges Map. Delivery drivers will be provided route maps identifying restricted segments and posted structures, and the EPC contractor will verify current restriction status with LCRC and MDOT each construction season, as restriction timing and posted limits are updated annually.

3.5 Construction Hours and School Bus Coordination

Rouget Road Solar is committed to avoiding use of public roads during designated school bus hours, as coordinated with local school districts. Classes in the schools in the area begin at approximately between 7:30am and 8:45am. Peak hours of school bus operation are between 6:30am and 8:00am in the morning and 2:30pm and 4pm in the afternoon. During this time a no-haul window will be incorporated to reduce traffic.

4 OPERATIONAL PHASE CONSIDERATIONS

Once construction is complete the volume of traffic to and from the site is expected to decrease significantly, resulting in minimal vehicle activity on a regular basis. Typical operations and maintenance (“O&M”) activities will require approximately two to five staff members on a weekly basis. In addition to these regular visits, there may be occasional instances when delivery vehicles or maintenance vehicles need to access the site.

5 TRAFFIC SAFETY AND MITIGATION MEASURES

To ensure safety and mitigate traffic on public roads, temporary signage and flaggers may be used, especially at site entrances. Pre- and post-construction road condition surveys will be conducted along all designated haul routes, with the Project assuming responsibility for restoring any damages identified because of construction activities. Dust control measures will be used, including the use of water trucks during dry conditions to suppress dust along unpaved haul routes. To avoid conflicts with school transportation, hauling activities will be suspended during published school bus windows, and coordination with local transportation officials will be maintained throughout the project. Local stakeholders will receive advance notification of any significant traffic changes.

6 PERMITTING AND AGENCY COORDINATION

Agency coordination will be necessary to secure permits required for construction and transportation of construction supplies. MDOT permits include oversize load permits and coordination for state highway access. Road use agreements, driveway permits, and traffic control approvals will need to be coordinated with the Lenawee County Road Commission. Local school districts will be coordinated with to avoid interference with bus routes. Emergency services will also be coordinated with to ensure access for fire, EMS, and law enforcement.

APPENDX C
SOLID WASTE ANALYSIS

The logo for SWCA (Soil Water Conservation Agency) is positioned vertically on the left side of the page. It consists of the letters 'S', 'W', 'C', and 'A' in a large, stylized, light blue font, stacked one above the other.

Solid Waste Plan for the Rouget Road Solar Project, Lenawee County, Michigan

SEPTEMBER 2026

PREPARED FOR

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PREPARED BY

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SOLID WASTE PLAN FOR THE ROUGET ROAD SOLAR PROJECT, LENAWEE COUNTY, MICHIGAN

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SWCA Project No.

September 2026

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1 PROJECT OVERVIEW

The Rouget Road Solar Farm (“Project”) is a proposed utility-scale solar energy generation facility being developed by Rouget Road Solar Farm, LLC (“Applicant”; “Rouget Road Solar”) located in Palmyra Township, Lenawee County, just southeast of the City of Adrian, Michigan. The Project will occupy predominantly agricultural land and will include photovoltaic (“PV”) arrays, associated inverters, access roads, and electrical collection systems.

2 TRAINING AND AWARENESS

Prior to construction, Rouget Road Solar will provide mandatory training for all contractors and subcontractors on proper waste handling, storage, recycling, and disposal procedures. Training will be documented and repeated for new personnel as needed throughout the construction period.

3 SOLID WASTE

3.1 Preconstruction Solid Waste

There are no buildings within the Project area that will require demolition. The pre-construction site clearing and grubbing activities may produce small amounts of woody vegetation debris. Woody vegetation debris generated during site clearing will be chipped and reused or composted within the Project area where feasible. If off-site disposal is necessary, a licensed contractor will dispose of the material at an authorized facility in compliance with state and local solid waste regulations.

3.2 Construction Solid Waste

The Project will generate minimal non-hazardous solid waste during construction activities. This waste will consist primarily of plastic, wood, cardboard, metal packing/package materials, construction scrap, and general refuse. Based on other solar project construction experience, the Applicant estimates that 10 to 20 dumpsters may be required for waste collection every week during the construction period. Much of the construction waste consists of recyclable materials which the Applicant will collect and divert from the waste stream, where possible.

Any solid waste generated at the Project’s construction site will be collected and disposed of in dumpsters located at the construction laydown areas. Dumpsters will be placed at construction office trailers, restrooms, and parking areas during construction. A private contractor will be hired to empty the dumpsters and dispose of the waste at an authorized solid waste disposal facility as needed.

3.3 Operational Solid Waste

Solid waste generated during the operations of the facility is anticipated to be minimal and readily managed within existing local and regional waste disposal capacity. Operation of the Project will generate small amounts of non-hazardous waste such as cardboard, plastic packaging, etc., as part of standard operations and maintenance (“O&M”) efforts. As much of the material will be recycled as possible. Solid waste during operation of the Project will be stored on-site at the proposed O&M facility and will be collected by a private contractor and disposed of at an authorized solid waste disposal facility. The Applicant will only utilize Tier 1 equipment suppliers and expects solar panels to pass Toxicity Characteristic Leaching

Procedure (“TCLP”) testing regulated by the U.S. Environmental Protection Agency (“USEPA”) to ensure they are not hazardous to people or the environment. Rouget Road Solar will maintain records of panel recycling or reuse consistent with USEPA and Michigan Public Service Commission guidance. Panels will be managed through certified recycling or manufacturer take-back programs whenever available.

4 WASTE PERMITS

The Project does not anticipate requiring licenses or permits for solid waste management. If hazardous or regulated wastes are generated, the Applicant will obtain and comply with all applicable permits.

APPENDIX D
SOCIOECONOMIC AND ENVIRONMENTAL JUSTICE
ASSESSMENT



Appendix D: Socioeconomic and Environmental Justice Assessments for the Rouget Road Solar Farm, Lenawee County, Michigan: Exhibit A-1.3

SEPTEMBER 2026

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**APPENDIX D: SOCIOECONOMIC AND ENVIRONMENTAL
JUSTICE ASSESSMENTS FOR THE ROUGET ROAD
SOLAR FARM, LENAWEЕ COUNTY, MICHIGAN: EXHIBIT
A-1.3**

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September 2026

EXECUTIVE SUMMARY

The Rouget Road Solar Farm Project (“Project”) is a proposed 175-megawatt alternating current solar photovoltaic power generating facility. The Project would be located in Lenawee County, Michigan, near the city of Adrian. Project construction would occur on approximately 2,133 acres of what is currently agricultural land. When built, the fenced-in portion of the Project would be approximately 1,042 acres.

Rouget Road Solar Farm, LLC, a wholly owned subsidiary of RWE Clean Energy LLC (“Applicant”) evaluated the Project’s likely effect on socioeconomic indicators such as population levels, community demographics, availability of housing and temporary accommodations, income, employment, agricultural activity, and government revenue. The Applicant also evaluated the Project’s permitting process to ensure the equitable treatment and meaningful involvement of all people, regardless of race, color, national origin, ability, or income, as it relates to the Project.

Rouget Road Solar Farm, LLC’s analysis indicates the following.

- The Project would not significantly and adversely impact population levels, demographics, housing and accommodations markets, employment levels, income levels, the agricultural sector, or government revenues.
- The Project would stimulate economic activity in and around Lenawee County. The resulting socioeconomic benefits would come primarily in the form of employment opportunities; direct payments to landowners; and increased government revenue during construction, operations and maintenance, and decommissioning.
- The Project is not anticipated to create environmental justice-related issues. This is because 1) neither the census tract nor the county that would contain the Project are communities of environmental justice concern; 2) while two census tracts within Lenawee County are communities of environmental justice concern, Project-related disturbances would dissipate rapidly such that the disturbances would be generally imperceptible among individuals in the census tracts of environmental justice concern; and 3) all people whose environment and/or health may be affected by the Project will be provided an opportunity to participate in Project-related permitting decisions.

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1 INTRODUCTION

The Rouget Road Solar Farm Project (“Project”) is a proposed 175-megawatt alternating current solar photovoltaic power generating facility. The Project would be located in Palmyra Township in southeast Lenawee County, Michigan, 4.5 miles northwest of Blissfield and 6.5 miles southeast of Adrian. The city of Adrian includes one of Michigan’s oldest theaters, the Croswell Opera House, among its 15 listings on the National Register of Historic Places (National Register of Historic Places 2025). The Lenawee County Airport is located just southwest of Adrian while the ProMedica Charles and Virginia Hickman Hospital is located approximately 6 miles to the north on Highway 52.

Project construction would occur on approximately 2,133 acres of currently agricultural land. When built, the fenced-in portion of the Project would be approximately 1,042 acres.

The Applicant evaluated the Project’s likely effect on socioeconomic indicators such as population levels, community demographics, availability of housing and temporary accommodations, income, employment, agricultural activity, and government revenue. The Applicant also evaluated the Project’s permitting process to ensure the equitable treatment and meaningful involvement of all people, regardless of race, color, national origin, ability, or income, as it relates to the Project.

Socioeconomic impacts, as discussed in subsequent sections, are driven primarily by the Project-related investments described in Mangum Economics (2025) and emissions/physical alterations brought about by the Project.

- Expenditure on architecture, engineering, site preparation, and other construction and development are estimated to be approximately \$146.8 million, some of which will go to Lenawee County vendors or laborers.
- Capital equipment expenditures are estimated to be \$154.7 million with all major purchases being made from vendors outside Lenawee County.
- Payments would be made to local landowners to gain access to approximately 2,133 acres of agricultural land in Lenawee County; the magnitude of these payments would be confidential.
- Total payments and taxes paid to government entities over the 35-year Project lifespan are estimated to be between \$33 and \$37 million.
- Noise, dust, and air pollutants would be emitted during the approximately 12-month construction period; viewshed alterations would persist throughout construction and operations and maintenance (“O&M”).

The socioeconomic assessment area was defined to include communities reasonably likely to be directly and materially impacted by the Project. After considering 1) the Project’s likely effect on resources such as air quality, noise levels, and views; 2) jurisdictional taxing authority; and 3) the distribution of population centers illustrated in Figure 1, the socioeconomic assessment area was defined as Lenawee County, Michigan.

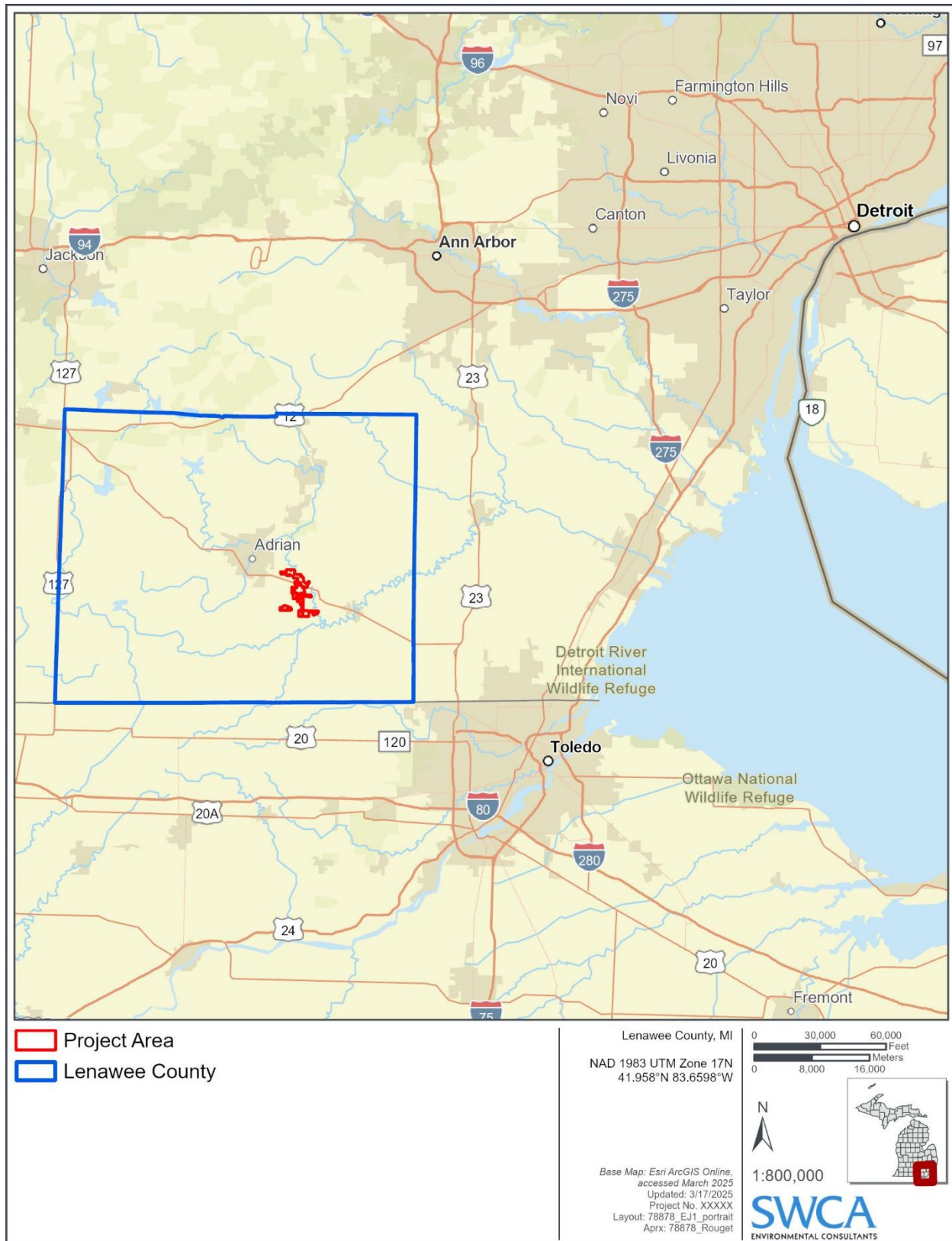


Figure 1. Socioeconomic assessment area.

2 SOCIOECONOMICS

2.1 Existing Socioeconomic Conditions

This section presents existing conditions in Lenawee County, Michigan. State-level information along with information for Adrian (the largest city in Lenawee County, located approximately 1 mile northwest of the nearest Project components) and Ann Arbor (the nearest metropolitan area in Michigan, located 40 miles northeast of the Project) are presented to provide additional context.

2.1.1 Population Levels and Demographics

As reported in Table 1, Lenawee County has a population of 98,823, which represents 1.0% of the population of Michigan. Approximately 21% of the Lenawee County population lives in the city of Adrian. While the proportion of Lenawee County residents who self-identify as an ethnicity other than “white alone, not Hispanic” is somewhat less than the same measure at the state level, the 29.5% of Adrian residents who self-identify as something other than “white alone, not Hispanic” is elevated relative to the statewide average (U.S. Census Bureau [“USCB”] 2014, 2024a).

Table 1. Population Level and Ethnicity

Population Sector	Adrian	Lenawee County	Ann Arbor	Michigan
Total population	20,493	98,823	121,179	10,051,595
Population change from 2013 to 2023	-2.7%	-0.7%	5.1%	1.7%
Hispanic or Latino of any race	21.3%	8.8%	5.4%	5.7%
White alone, not Hispanic	70.5%	85.2%	66.7%	73.0%
Black or African American alone	3.9%	2.2%	7.0%	13.2%
American Indian alone	0.1%	0.1%	0.2%	0.3%
Asian alone	0.3%	0.3%	15.1%	3.3%
Native Hawaiian or Pacific Islander alone	0.1%	0.0%	0.0%	0.0%
Some other race alone	0.0%	0.1%	0.5%	0.4%
Two or more races	3.8%	3.3%	5.0%	4.1%

Source: USCB (2014, 2024a)

Table 2 presents English proficiency as estimated in the USCB’s American Community Survey (“ACS”) 2023 5-year estimates.

- In Lenawee County, 1.4% of individuals (1,384 persons) speak English less than “very well.” Most of these individuals speak Spanish as their primary language.
- Approximately half of the Lenawee County residents who speak English less than “very well” reside in the city of Adrian. Among these 687 individuals, the majority speak Spanish as their primary language.

Table 2. Languages Spoken

Population Sector	Adrian	Lenawee County	Ann Arbor	Michigan
Total population	20,493	98,823	121,179	10,051,595
Population 5 years or older	19,617	93,829	116,549	9,502,054
Speak only English	89.4%	95.4%	77.6%	89.8%
Speak a language other than English	10.6%	4.6%	22.4%	10.2%
Spanish or Spanish Creole	8.3%	3.3%	3.3%	3.0%
Other Indo-European languages	0.8%	0.8%	6.5%	3.0%
Asian and Pacific Island languages	0.2%	0.2%	9.5%	1.7%
Other languages	1.3%	0.3%	3.2%	2.4%
Speak English less than “very well”	3.5%	1.4%	5.8%	3.6%

Source: USCB (2024b)

2.1.2 Housing and Temporary Accommodations

According to the USCB’s ACS 2023 5-year estimates, there are 314 vacant rental housing units in Adrian. Lenawee County has 442 vacant rental housing units, which represents 0.8% of the total vacant rental housing in Michigan (58,335) (USCB 2024c). Google Maps (2025) indicates that there are approximately 13 hotels and motels as well as 18 campgrounds in Lenawee County; all are located within an approximately 30-minute drive of the Project site.

Located approximately 45 minutes from the Project site, Ann Arbor is the nearest metropolitan area. Ann Arbor has 1,000 vacant rental housing units (USCB 2024c). In addition, according to Destination Ann Arbor (2025), there are 42 hotels and motels, 11 bed and breakfasts, and seven campgrounds in the greater Ann Arbor area.

The larger metropolitan areas of Detroit, Michigan, and Toledo, Ohio, are within a 1.5-hour commute; Visit Detroit (2025) reports the greater Detroit area has over 36,000 hotel rooms while Destination Toledo (2025) identifies more than 40 hotels in Toledo.

2.1.3 Employment and Income

Table 3 presents per capita income level, persons in poverty, and the unemployment rate as estimated in the USCB ACS 2023 5-year estimates. While the poverty rate in Lenawee County is below the state average, the poverty rate in Adrian is above the state average. This observation is somewhat unexpected given Adrian’s low unemployment rate and may be reflective of a relatively low wage base¹ and, as indicated by comparing total population (Table 1) to Total Number Employed (Table 4), a relatively high proportion of persons not in the workforce.

¹ The U.S. Bureau of Labor Statistics (2025) reports that earnings among workers in leisure and hospitality tend to be less than the national average. As noted in Table 4, an unusually large proportion of employment in Adrian is in this sector.

Table 3. Per Capita Income Level, Persons in Poverty, and Unemployment Rate

State/County/City	Per Capita Income Level (U.S. dollars)	Persons in Poverty	Poverty Rate (%)	Unemployed (%)
Michigan	\$39,538	1,284,470	12.8%	3.6%
Ann Arbor	\$54,604	25,145	20.8%	2.2%
Lenawee County	\$33,914	10,915	11.0%	3.1%
Adrian	\$25,696	4,300	21.0%	2.7%

Source: USCB (2024c, 2024d)

Table 4 reports the distribution of jobs across industry sectors for the civilian-employed population aged 16 years or older. In Adrian, the proportion of individuals who participate in the civilian labor force (41.5%) is somewhat lower than the same measure for Lenawee County (44.5%) and the state of Michigan (46.9%) (USCB 2024f). The educational services, health care, and social assistance sector make up 26.8% of the civilian-employed population 16 years or older in Adrian, followed by manufacturing (20.1%). These two industry sectors are also predominant in Lenawee County and the state of Michigan. The educational services, health care, and social assistance sector in Ann Arbor accounts for twice the proportion of jobs relative to the Michigan average due to the presence of the University of Michigan. It is notable that Adrian has an unusually high proportion of its residents employed in arts, entertainment, recreation, accommodation, and/or food services.

Table 4. Employment by Industry

Population Sector	Adrian	Lenawee County	Ann Arbor	Michigan
Total number employed	8,507	43,982	62,888	4,712,135
Agriculture, forestry, fishing and hunting, and mining	1.9%	3.0%	0.3%	1.1%
Construction	4.2%	6.5%	1.5%	5.8%
Manufacturing	20.1%	20.3%	9.2%	18.4%
Wholesale trade	1.2%	1.8%	1.0%	2.1%
Retail trade	12.1%	11.6%	6.3%	10.8%
Transportation and warehousing, and utilities	4.5%	4.3%	1.8%	4.8%
Information	0.9%	1.3%	1.8%	1.2%
Finance and insurance, and real estate rental and leasing	2.6%	3.3%	3.6%	5.8%
Professional, scientific, and management, and administrative and waste management services	5.2%	7.2%	13.9%	10.1%
Educational services, and health care and social assistance	26.8%	24.2%	46.7%	23.3%
Arts, entertainment, and recreation, and accommodation and food services	13.9%	8.2%	9.0%	8.6%
Other services, except public administration	3.8%	4.3%	3.5%	4.5%
Public administration	2.8%	4.0%	1.2%	3.5%

Source: USCB (2024f)

2.1.4 Agricultural and Timberland

In 2022, there were 327,255 acres in Lenawee County farms. Of this, 287,358 acres were in cropland, 3,779 acres were in pastureland, 20,966 acres were in woodland, and 15,152 acres were used for other purposes. The net cash farm income in 2022 was estimated to be \$98,213,000 (U.S. Department of Agriculture 2022).

The area surrounding the Project includes primarily agricultural land, with some small businesses, and residential properties. No schools, civic institutions, or recreational facilities are located within 1,000 feet of the Project.

2.1.5 Government Revenue

Lenawee County reported annual revenue between of \$31.5 million and \$41.6 million for the years 2022 through 2024 (Lenawee County Administrator 2024). This county-level revenue is small in the context of Michigan state's annual revenue of over \$40 billion (House Fiscal Agency 2023).

2.2 Socioeconomic Impacts and Mitigation

Approximately 400 full-time equivalent positions would be created over the approximate 12-month construction period. The Applicant intends to employ local contractors and businesses during construction, where practical. However, the Applicant anticipates some phases of Project construction will require specialized labor skills from licensed contractors and subcontractors with adequate and relevant expertise. When acceptable local sources of labor are not available, expertise and services from businesses in other regions of Michigan and/or surrounding states will be used. During O&M, the Applicant anticipates hiring up to five full-time technicians.

The Applicant has secured property access through voluntary lease or purchase agreements. While the size of these payments is confidential, such payments tend to represent an increase in present value revenue to local landowners.

While the methods used to tax the Project have not yet been finalized, The Applicant anticipates that the Project will contribute approximately between \$33 million and \$437 million to government revenue over the 35-year Project lifespan.

2.2.1 Impacts to Population Levels and Demographics

To the extent that non-local laborers are required to augment the local labor pool, the influx of non-local workers associated with the 400 full-time equivalent positions that would be created over the approximate 12-month construction period would have a minor, short-term effect on local population levels and demographic composition. During Project O&M, up to five full-time technicians would be employed, and so negligible population and demographic impacts are anticipated during Project O&M.

Impacts during decommissioning are generally similar to or less than those associated with construction given the comparably smaller workforce and shorter time for completion.

2.2.2 Impacts to Housing and Temporary Accommodations

During Project construction, the average number of construction personnel on-site per day is expected to be approximately 200 to 400 on average. Workers who live within commuting distance of the Project will be employed, as practical. When the use of local labor is not practical, employees from outside local areas will be employed. During Project O&M, up to five full-time technicians would be employed.

During Project construction, non-local laborers would likely use nearby campgrounds, hotels, or motels. With 13 hotels and motels as well as 18 campgrounds within a 30-minute commute and the metropolitan areas of Ann Arbor, Michigan, Detroit, Michigan, and Toledo, Ohio, within commuting distance, even if all construction workers required temporary accommodations, the market would be able to accommodate

the temporary demand, and their presence should not displace a material number of individuals who would otherwise use these facilities. Thus, the influx of Project-related workers during construction is characterized as a minor, short-term increase in demand for local accommodations.

The five full-time technicians employed during Project O&M would have no material effect on demand for local accommodations.

Impacts during decommissioning would generally be similar to or less than those associated with construction given the comparably smaller workforce and shorter time for completion.

One concern commonly expressed in relation to solar projects is that the value of surrounding properties may be diminished. The existing literature suggests that this is not the case in rural areas. A study by CohnReznick LLP (2018), reviewed information on the property value trends of lands adjacent to nine existing solar farms and concluded that proximity to solar farms had not deterred sales of nearby agricultural land and/or residential single-family homes. A more recent study by Hao and Michaud (2024) found that being located near utility-scale solar projects in the Midwest is associated with a slight increase in value.

2.2.3 *Impacts to Employment and Income*

Mangum Economics (2025) used Project-specific information provided by the Applicant and a regional economic model called IMPLAN to estimate the total economic impact the Project would have on Lenawee County in terms of both employment opportunities and payroll. The results of their analysis are summarized in the following bullets.

- Architecture, engineering, site preparation, and other construction and development expenditures are expected to total approximately \$122.1 million. Construction is expected to result in the direct creation of 37 job years² in Lenawee County and the indirect creation of an additional 64 job years. The total wages and benefits associated with these in-county job years are estimated to be \$6.5 million.
- During Project O&M, approximately four full-time technicians would be employed with a total estimated annual payroll and benefits of \$516,000. This employment, along with other fees and payments made by the Project, is expected to create an additional 10 employment opportunities in Lenawee County with total estimated annual wages and benefits of \$446,000.
- Removing approximately 1,042 acres of land from agricultural productivity would reduce agricultural activity in the county, bringing about the loss of six annual employment opportunities with total estimated annual wages of \$266,000.
- Payments would be made to landowners to gain access to 2,133 acres of agricultural land needed for construction and for approximately 1,042 acres of land converted to solar farm. While the magnitude of these payments is confidential, they are likely to exceed, on an annualized basis, the cropland rental rate for unirrigated cropland in Lenawee County, which averaged \$180 per acre-year in 2023 (U.S. Department of Agriculture 2024).

Given the Lenawee County labor force of almost 44,000 (see Table 4), the combined direct and indirect effects of construction would represent a minor short-term increase in local employment opportunities and income among the Lenawee County labor force and local businesses. However, the creation of 101 job

² A job year represents full-time employment (40 hours per week) for an entire year. Job years are used to characterize total construction-related employment which may require some workers to work more than 40 hours per week and/or may not persist for an entire year.

years in a county that has a 44,000-person labor force is not expected to materially shift employment by sector or wage rates.

During Project O&M, no material impacts on employment levels are anticipated.

2.2.4 Impacts to Agricultural and Timberland

Given the 327,255 acres of land currently dedicated to farms in Lenawee County, the Project-related conversion of up to 2,133 of these acres is not expected to materially affect farming-related output or employment during any phase of the Project.

Mangum Economics (2025) estimates that removing approximately 1,042 acres of land from agricultural production would reduce annual Lenawee County employment opportunities by approximately six with associated wages of approximately \$266,000. Approximately one half of these employment opportunities would be direct, agricultural jobs.

Impacts to land uses surrounding the Project are not anticipated because the Project incorporates sound mitigation strategies, setbacks, and vegetative buffers to reduce noise and visual disturbances and efforts have been made to preserve surrounding woodlots and farmland wherever possible.

2.2.5 Impacts to Government Revenue

In Michigan, the Solar Energy Facilities Taxation Act provides a tax incentive to owners of new utility-scale solar energy generation facilities and provides local governments with a guaranteed and stable revenue stream from the solar energy generation facilities. A Solar Energy Facility Exemption Certificate (“SEFEC”) entitles a qualified facility to an exemption from ad valorem real property taxes for a term of 20 years. Exempt solar facilities are subject to the Solar Energy Facilities Tax each year after the facility is placed in service which is equal to \$7,000 per megawatt of nameplate capacity. The revenue is distributed across the state, cities, school districts, townships, counties, villages, and other authorities.

Mangum Economics (2025) estimated that, assuming the Project qualifies for a SEFEC, the total local government revenue would be approximately \$33 million over the 35-year Project lifespan. The allocation of the tax revenue was estimated as follows: \$8.8 million for Lenawee County, \$4.1 million for Palmyra Township, \$4.3 million for the Blissfield Community School District, \$4.3 million for the Adrian City School District, \$10.1 million for the Lenawee Intermediate School District, and \$1.3 million for the Lenawee Library District. If the Project does not qualify for a SEFEC, total local government revenue would increase to approximately \$37 million.

Mangum Economics (2025) further estimated that, absent the Project, the tax revenue generated by the subject property over those 35 years would be approximately \$2 million. Thus, the average net increase in annual government revenue is estimated to be between \$0.9 million (calculated as [$\$33 \text{ million} - \2 million] $\div$ 35 years) and \$1 million (calculated as [$\$33 \text{ million} - \2 million] $\div$ 35 years).

Neither construction, O&M, or decommissioning of the Project are expected to impose any material increase in demand for public services or require any increase in local government expenditures. To put the net of approximately \$0.9 to \$1 million in annual government revenue in context, Lenawee County reported annual expenditures of \$40.4 million in 2022 and \$33.7 million in 2023 (Lenawee County Administrator 2024). Thus, the net increase in annual revenue would represent modest beneficial impact to the county (an increase of 2% to 3%) over the 35-year Project lifespan.

2.2.6 Socioeconomic Impact and Mitigation Summary

The Project would not significantly and adversely impact population levels, demographics, housing and accommodations markets, employment levels, income levels, the agricultural sector, or government revenues.

The Project would stimulate economic activity in and around Lenawee County. The resulting socioeconomic benefits would come primarily in the form of employment opportunities; direct payments to landowners; and increased government revenue during construction, O&M, and decommissioning.

3 ENVIRONMENTAL JUSTICE

Michigan defines environmental justice (“EJ”) as the equitable treatment and meaningful involvement of all people, regardless of race, color, national origin, ability, or income. The state further defines *equitable treatment* as ensuring that 1) no group of people bears a disproportionate share of the negative consequences resulting from governmental, industrial, or commercial operations and policies and 2) all people benefit from the application of laws and regulations eliminating barriers such as poverty and lack of access, as well as repairing systemic injustices. *Meaningful involvement* is defined to mean 1) people have an opportunity to participate in decisions that affect their environment and/or health; 2) decision-makers seek out and facilitate the involvement of those potentially affected; 3) people’s concerns are considered in decision-making processes; and 4) people can influence state agency decisions (Michigan Department of Environment, Great Lakes, and Energy 2025a).

An EJ assessment was conducted to determine if any communities characterized by an unusually high exposure to environmental stressors and/or an unusually high sensitivity to environmental stressors (hereafter communities of EJ concern) would bear a disproportionate share of any negative consequences resulting from the Project. In addition, the Applicant reviewed its public outreach effort to ensure that people, regardless of their race, color, national origin, ability, and income, had an opportunity to meaningfully participate in decisions regarding Project permitting.

The assessment was conducted in three steps:

1. Michigan’s EJ screening tool (“MiEJScreen”) (Michigan Department of Environment, Great Lakes, and Energy 2025b) was used to identify communities of EJ concern in Lenawee County.
2. Information characterizing the Project’s impact on environmental resources was used to determine if the Project is likely to disproportionately and adversely affect communities of EJ concern.
3. The Project’s public outreach effort was documented and reviewed to determine whether people had the opportunity to meaningfully participate in Project-related permitting decisions regardless of their race, color, national origin, ability, and income.

3.1 Identifying Communities of Environmental Justice Concern

MiEJScreen (Michigan Department of Environment, Great Lakes, and Energy 2025b) assigns each census tract in Michigan an EJ score; the score is intended to indicate the relative sensitivity of a census tract’s residents to environmental changes. Each census tract is then ranked relative to all other census tracts in the state.

The Applicant identified communities of EJ concern as census tracts whose EJ score places it at or above the 80th percentile. This score indicates that at least 80% of the other census tracts in Michigan are characterized by a lower level of sensitivity to environmental change.

Using this criteria, two Lenawee County census tracts (GEOID 26091061301 and GEOID 26091061302) are identified as communities of EJ concern, both of which are located in the city of Adrian (Table 5). The factors causing these two census tracts to be identified as areas of EJ concern include 1) proximity to environmental disamenities such as solid waste facilities and sites, Risk Management Plan³ sites, and wastewater discharge sites and 2) demographic characteristics often associated with a relatively high level of difficulty adopting strategies that could otherwise mitigate adverse environmental impacts.

The location of these census tracts, relative to the Project, is illustrated in Figure 2.

Table 5. Population Characteristics of GEOIDs 26091061301 and 26091061302

Characteristic	GEOID 26091061301	GEOID 26091061302	Lenawee County	Michigan	Source
Distance to nearest Project component	1 mile	2 miles	Not applicable	Not applicable	Not applicable
Population (persons)	3,371	3,341	98,823	10,051,595	USCB (2024a)
Population density (persons per square mile)	1,774.2	5,568.3	131.8	177.8	USCB (2023, 2024a)
Percentage of persons self-identifying as a minority	38.8%	45.0%	14.8%	27.0%	USCB (2024a)
Median household income	\$36,705	\$39,915	\$67,013	\$71,149	USCB (2024d)
Unemployment rate	2.6%	1.8%	3.1%	3.6%	USCB (2024d)
Proportion of persons over age 5 with limited English proficiency	6.5%	1.3%	1.4%	3.6%	USCB (2024b)
Exposure percentile*	61	66	Not applicable	Not applicable	Michigan Department of Environment, Great Lakes, and Energy (2025b)
Environmental effects percentile [†]	92	93	Not applicable	Not applicable	
Sensitive populations percentile [‡]	73	77	Not applicable	Not applicable	
Socioeconomic percentile [§]	96	86	Not applicable	Not applicable	

* Weighted average of percentile rankings for air toxics cancer risk, respiratory hazard index, diesel particulate matter, PM_{2.5}, ozone, and traffic density.

[†] Indicative of proximity to cleanup sites, hazardous waste facilities, impaired water bodies, solid waste facilities and sites, lead paint indicator, proximity to Risk Management Plan sites, and wastewater discharge indicator.

[‡] Indicative of asthma rates, cardiovascular disease rates, infant birth weights, blood lead level, and life expectancy.

[§] Indicative of income levels, ethnicity, education attainment, linguistic isolation, population under age 5, population over age 64, unemployment rate, and housing burden.

³Risk Management Plan facilities use hazardous substances and so are required to develop a Risk Management Plan under Section 112(r) of the 1990 Clean Air Act amendments.

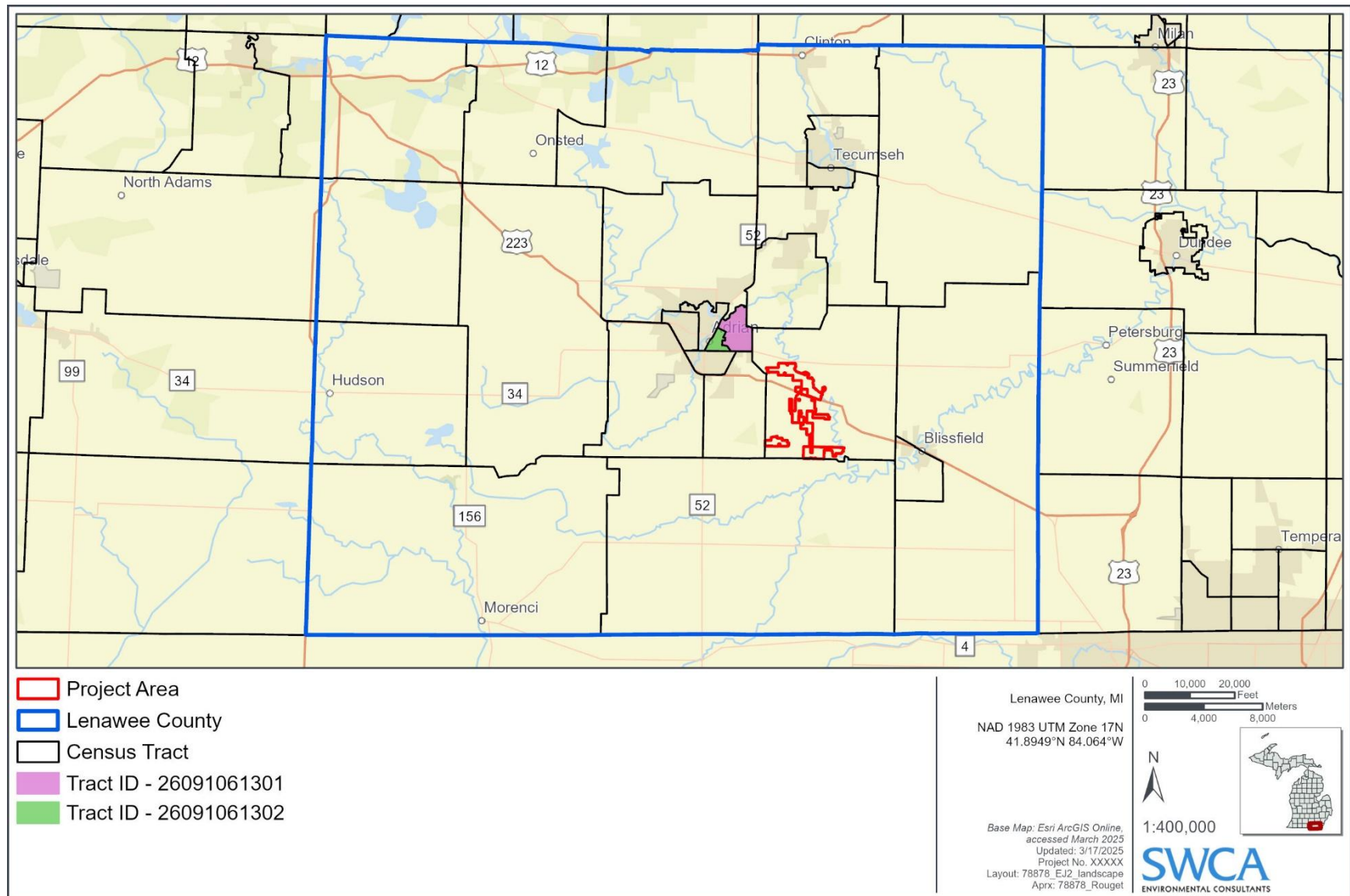


Figure 2. Geographic relationship between the Project and communities of EJ concern.

3.2 Evaluating the Potential for Disproportionate and Adverse Impacts

Determining whether a project is likely to adversely and disproportionately impact a community of EJ concern is a matter of professional judgment. It has been suggested that, in making this determination, analysts consider whether members of communities of EJ concern are more sensitive to Project-related impacts than the general public because of income status, historical exclusion based on race or ethnicity, an inability to respond to the action, or increased exposure potential.

When conducting this EJ assessment, the full range of potential changes that could affect humans was considered (e.g., potential changes in air quality, potential changes in water quality, potential degradation of cultural resources and viewsheds, land use conversions, and socioeconomic alterations). In each instance, the analyst asked whether the communities of EJ concern would have different ways, relative to the general population, of being adversely affected by the Project. Three specific questions provided below were posed. Both direct and indirect Project impacts were considered when answering these questions.

1. Are these communities likely to be disproportionality and adversely affected because they are more sensitive to a given level of exposure due to preexisting medical conditions, reduced access to health care, and/or because they are exposed to higher baseline concentrations of health stressors, such as PM_{2.5}?
2. Are these communities likely to be disproportional and adversely affected due to lifestyle approaches such as subsistence fishing or because they have different cultural, community, or religious practices?
3. Are these communities likely to be disproportionality and adversely affected because their economic status or language barriers prevent them from taking mitigating actions that general members of the public might readily adopt, such as closing doors and windows to limit dust exposure?

After considering all potential Project impacts, the Applicant identified no instances where communities of EJ concern were 1) likely to be more sensitive to a given level of Project exposure; 2) likely to be disproportionately exposed due to lifestyle approaches; or 3) likely to be prevented from taking mitigating actions that general members of the public might readily adopt. This conclusion stems largely from the observation that the Project's potentially adverse impacts are primarily related to 1) air emissions, noise emissions, and dust generation during construction and 2) long-term viewshed alteration. The impacts of these changes tend to be most acute near a project site and dissipate through space such that they would be generally imperceptible among individuals living, working, or recreating in census tracts GEOID 26091061301 and GEOID 26091061302.

3.3 Evaluating the Opportunity for Meaningful Public Participation

The Applicant has established a website that provides a Project overview and affords site users the opportunity to comment on the Project and/or communicate with a Rouget Road Solar Farm, LLC employee about the Project. In addition, the Applicant has coordinated with the following elected officials: David H. Pixley, Sr., Palmyra Township Supervisor, and James Van Doren, Chair, Lenawee County Board of Commissioners.

As the Project progresses, the Applicant plans to conduct a public meeting at an accessible location in Lenawee County. Notice of the public meeting will 1) appear on the Rouget Road Solar Farm, LLC website,

2) be sent to individuals who have requested information on the website, 3) be published in the Daily Telegram (local newspaper) and 4) as allowed, be posted at libraries and post offices throughout the county. Meeting times will be selected to minimize the probability that an individual would be unable to attend the meeting for work reasons. The Applicant notes that Lenawee County does not have a material number of limited English-speaking individuals, which could otherwise hinder efforts to communicate Project details. As practical, Project changes will be made to accommodate concerns identified through the public outreach process. Exhibits A-4.1 through A-4.5 of this Application provide additional details.

Given the ongoing and planned public outreach effort, the Applicant concludes that the community will be provided an opportunity to participate in Project-related decisions that may affect their environment and/or health and that these opportunities exist regardless of race, color, national origin, ability, and income.

3.4 Environmental Justice Summary

The Project is not anticipated to create EJ-related issues. This is because 1) neither the census tract nor the county that would contain the Project are communities of EJ concern; 2) while census tract GEOIDs 26091061301 and 26091061302 are communities of EJ concern, Project-related disturbances would dissipate through space such that they would be generally imperceptible among individuals in the census tracts of EJ concern; and 3) all people whose environment and/or health may be affected by the Project will be provided an opportunity to participate in Project-related permitting decisions.

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