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Cultural Resources Desktop Review for the Rouget Road, LLC, Lenawee County, Michigan

JANUARY 2025

PREPARED FOR
Rouget Road, LLC

PREPARED BY
SWCA Environmental Consultants

**CULTURAL RESOURCES DESKTOP REVIEW FOR THE
ROUGET ROAD, LLC
LENAWEE COUNTY, MICHIGAN**

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1 INTRODUCTION

SWCA Environmental Consultants (SWCA) completed a cultural resources desktop review for the proposed Rouget Road, LLC (project), located in Lenawee County, Michigan (Figure A-1 in Appendix A). The Project Area spans approximately 2,490 acres (1,008 hectares) of privately owned land near the towns of Adrian, Palmyra, and Ogden. SWCA completed the desktop review for the Project Area plus a surrounding 1.0-mile (1.6-kilometer) buffer around the Project Area. The surrounding 1.0-mile buffer is henceforth referred to as the Study Area (Figures A-2 and A-3).

The objective of the desktop review was to identify existing cultural resources within the Project Area and Study Area to inform project facility siting. Additionally, the Study Area was evaluated to gain an understanding of the type and density of cultural resources in the vicinity of the Project Area. This report summarizes the methods SWCA used to complete the desktop review and presents the results of the background research. It does not serve as Section 106 clearance for the proposed project.

2 REGULATORY FRAMEWORK

Projects in Michigan can come under the purview of two primary cultural resources regulations, the National Historic Preservation Act (NHPA) and Michigan's Natural Resources and Environmental Protection Act. Both are administered by the Michigan State Historic Preservation Office (MI SHPO).

If the project is deemed a federal undertaking (requiring a federal permit, license, or approval; being located on federally owned or managed land; or receiving federal financial assistance), a cultural resources survey most likely would be mandated to ensure compliance with Section 106 of the NHPA. The scope of required cultural resources surveys would then be determined by the functioning federal lead agency in cooperation with the MI SHPO and, if applicable, the pertinent Tribal Historic Preservation Offices as defined in both Section 101 of the National Environmental Policy Act and Section 106 of the NHPA.

Under Michigan law, the state oversees all archaeology performed on state land. The Natural Resources and Environmental Protection Act (Public Act 451 of 1994, Part 761) requires that a permit be obtained prior to undertaking any archaeological investigation on state land.

Public Act 233, which created a statewide process to permit solar, wind, and battery projects across the state and took effect November 29, 2024, applies to solar projects with a nameplate capacity of 50 megawatts or more, to wind projects with a capacity of 100 megawatts or more, and to energy storage facilities with a capacity of 50 megawatts or more. Public Act 233 allows developers the option of applying to the Michigan Public Service Commission (MPSC) to construct utility-scale renewable energy facilities if the local unit of government does not have a compatible renewable energy ordinance. If a compatible renewable energy ordinance is in place, the developer must apply with the local unit of government first, but if the project is denied, the developer may submit to the MPSC for approval. Projects that fall into these categories must identify and provide information on the effects of the project on environmental, natural, and cultural resources.

The project will occur solely on privately held land; thus, no state or local laws requiring archaeological investigations or surveys are anticipated to apply for this project. However, Public Act 233 requires the project proponent to identify and provide information on cultural resources potentially affected by the project to the MPSC.

3 METHODOLOGY

SWCA initially submitted a request for in-person research to the MI SHPO on April 7, 2023. Staff at the MI SHPO approved the request and scheduled a research appointment for April 20, 2023. An SWCA archaeologist obtained information in person on previous cultural resources surveys, previously recorded archaeological resources, and previously recorded postcontact architectural resources within the Study Area.

As the Project Area and Study Area were revised in fall 2024, SWCA submitted a second request to the MI SHPO for archaeology and survey site files within the revised Study Area. MI SHPO provided all available records on December 9, 2024. Due to the ongoing updates to the MI SHPO's database, a process that was initiated on February 24, 2024, only archaeology files are currently available. Postcontact architecture files and both postcontact architectural and archaeological survey reports are not currently available as the MI SHPO are scanning these files for upload into a new database. As such, SWCA relied on the April 2023 postcontact architectural resource files and survey reports for this review. SWCA additionally reviewed the National Register of Historic Places (NRHP) database for Michigan as the best available recent data regarding architectural resources.

In addition to the site file search, SWCA investigated historic plat and topographic maps and historic aerial imagery of the Project Area and Study Area. SWCA also researched environmental factors such as modern and historic land use and soil units mapped by the Natural Resources Conservation Service (NRCS) to determine the likelihood of the project to encounter previously unrecorded precontact or postcontact archaeological resources.

4 RESULTS

4.1 Physiography, Geology, and Soils

The Project Area is situated within the Erie-Huron Lake Plain of the Eastern Lake section of the Central Lowland province of the Interior Plains (NRCS 2022:343). The Erie-Huron Lake Plain is a fairly level glacial lake plain with scattered sandy ridges formed by former shorelines and moraines. Elevation ranges from approximately 570 to 815 feet (175 to 250 meters [m]), whereas local relief averages 10 feet (3 m). Major confluences in the Erie-Huron Lake Plain include the Clinton, Huron, and Saginaw Rivers, which empty into the Great Lakes. The Project Area is located within the Floodwood Creek-River Raisin watershed and the Big Meadow Drain-Black Creek watershed, which empty into the River Raisin (U.S. Environmental Protection Agency 2023). Mississippian- to Silurian-age limestone, shale, and dolomite are common along the surface and along the shores of Lake Erie and Lake Huron. Broad, level, and somewhat poorly drained lake plains feature American beech, sugar maple, silver maple, green ash, pin oak, swamp white oak, and American elm, whereas sandy areas feature eastern white pine, eastern hemlock, and other coniferous trees (NRCS 2022:344).

This ecoregion is also part of the Maumee Lake Plain and the Ann Arbor Moraines sub-subsections. The Maumee Lake Plain is a broad, flat, glaciated clay lake plain with rich, loamy soils deeply mantled by till and outwash and dissected by broad glacial drainageways containing sandy soils (Albert 1995). This region formerly included beech-sugar maple forest, elm-ash forest, deciduous swamps, white oak-black oak savannas, wet prairies, and coastal marshes, but now has been largely cultivated (Albert 1995; NRCS 2022). The Ann Arbor Moraines sub-subsection is a long, narrow band of fine- and medium-textured end and ground moraine bordered by flat lake plain on the east and by sandy outwash, end moraine, and ice-contact features to the west. This region formerly supported oak and oak-hickory forests, with oak

savannas along the western edge (Albert 1995). Major wildlife species in the Erie-Huron Lake Plain area include white-tailed deer; cottontail rabbits; squirrels; raccoons; pheasants; bobwhite quail; songbirds; various species of snakes, frogs, and turtles; sunfish; perch; bass; walleye; catfish; carp, sucker; and northern pike.

There are 40 soil series mapped within the Project Area by the NRCS (Table 1). The soils range from very poorly drained to excessively drained loams to sandy loams. The most common soils for the Project Area include Brady and Macomb loams, 0 to 3 percent slopes; Colwood very fine sandy loam, 0 to 3 percent slopes; Wauseon loam, 0 to 3 percent slopes; Ziegenfuss clay loam, 0 to 1 percent slopes; Brady and Macomb sandy loams, 0 to 3 percent slopes; and Colwood and Wauseon fine sandy loams, 0 to 3 percent slopes. These soil types, and their implication for site formation processes and archaeological potential, are discussed further in Section 4.6.

Table 1. Soils within the Project Area

Map Unit Symbol	Map Unit Name	Drainage	Associated Landform(s)	Parent Material
BbA	Berrien loamy sand, 0 to 3 percent slopes	Moderately well drained	Strand plains on till-floored lake plains	Sandy glaciolacustrine deposits over loamy lacustrine deposits and/or loamy till
BbB	Berrien loamy sand, 3 to 7 percent slopes	Moderately well drained	Strand plains on till-floored lake plains	Sandy glaciolacustrine deposits over loamy lacustrine deposits and/or loamy till
BcA	Berrien sandy loam, 0 to 3 percent slopes	Moderately well drained	Strand plains on till-floored lake plains	Sandy glaciolacustrine deposits over loamy lacustrine deposits and/or loamy till
BcB	Berrien sandy loam, 3 to 7 percent slopes	Moderately well drained	Strand plains on till-floored lake plains	Sandy glaciolacustrine deposits over loamy lacustrine deposits and/or loamy till
BhA	Brady sandy loam, 0 to 3 percent slopes	Somewhat poorly drained	Knolls on strand plains	Loamy over sandy and gravelly glaciofluvial deposits
BkA	Brady and Macomb loams, 0 to 3 percent slopes	Somewhat poorly drained	Strand plains on till-floored lake plains	Loamy over sandy glaciolacustrine deposits
BmA	Brady and Macomb sandy loams, 0 to 3 percent slopes	Somewhat poorly drained	Strand plains on till-floored lake plains	Loamy over sandy glaciolacustrine deposits
BnA	Bronson sandy loam, 0 to 3 percent slopes	Moderately well drained	Knolls on strand plains	Loamy glaciofluvial deposits over sandy and gravelly glaciofluvial deposits
BnB	Bronson sandy loam, 3 to 7 percent slopes	Moderately well drained	Knolls on strand plains	Loamy glaciofluvial deposits over sandy and gravelly glaciofluvial deposits
BoA	Brookston loam, 0 to 3 percent slopes	Very poorly drained	Depressions on till plains	Loamy till
BpA	Brookston loam, overwashed, 0 to 3 percent slopes	Very poorly drained	Depressions on till plains	Loamy till
CbB	Cadmus sandy loam, 3 to 7 percent slopes	Moderately well drained	Knolls on ice-contact slopes	Loamy glaciofluvial deposits over loamy till
CeA	Colwood very fine sandy loam, 0 to 3 percent slopes	Poorly drained	Depressions on deltas	Stratified loamy glaciofluvial deposits
CfA	Colwood and Wauseon fine sandy loams, 0 to 3 percent slopes	Poorly drained	Depressions on deltas	Stratified loamy glaciofluvial deposits
CgA	Conover loam, 0 to 3 percent slopes	Somewhat poorly drained	Knolls on till plains	Loamy till
GbA	Genesee sandy loam, 0 to 3 percent slopes	Well drained	Knolls on flood plains	Loamy alluvium

Map Unit Symbol	Map Unit Name	Drainage	Associated Landform(s)	Parent Material
GcA	Genesee and Eel loams, 0 to 3 percent slopes	Well drained	Knolls on flood plains	Loamy alluvium
GfA	Griffin and Genesee loams, 0 to 3 percent slopes	Somewhat poorly drained	Meander scars on flood plains	Loamy alluvium
GgA	Griffin and Sloan loams, 0 to 3 percent slopes	Somewhat poorly drained	Meander scars on flood plains	Loamy alluvium
GhA	Griffin and Sloan sandy loams, 0 to 3 percent slopes	Somewhat poorly drained	Meander scars on flood plains	Loamy alluvium
HfA	Hoytville and Wauseon loams, 0 to 3 percent slopes	Very poorly drained	Depressions on till plains	Clayey till
KbC	Kendallville sandy loam, 7 to 15 percent slopes	Well drained	Knolls on ice-contact slopes	Loamy glaciofluvial deposits over till
KeA	Kibbie and Colwood fine sandy loams, 0 to 3 percent slopes	Somewhat poorly drained	Knolls on deltas	Stratified loamy glaciofluvial deposits
LcA	Linwood muck, 0 to 3 percent slopes	Very poorly drained	Depressions on till-floored lake plains	Wood organic material over loamy till
MaA	Macomb fine sandy loam, 0 to 3 percent slopes	Somewhat poorly drained	Drainageways on till-floored lake plains	Sandy and/or loamy glaciofluvial deposits over loamy till
NaA	Nappanee silt loam, 0 to 3 percent slopes	Somewhat poorly drained	Knolls on till plains	Clayey till
NbB	Nappanee loam, 3 to 7 percent slopes	Somewhat poorly drained	Knolls on ground moraines	Clayey till
NbB2	Nappanee loam, 3 to 7 percent slopes, moderately eroded	Somewhat poorly drained	Knolls on ground moraines	Clayey till
OcC	Ottawa loamy sand, 7 to 15 percent slopes, slightly or moderately eroded	Excessively drained	Beaches on till-floored lake plains	Glaciofluvial deposits and/or sandy glaciolacustrine deposits over loamy till
PcA	Pewamo mucky clay loam, 0 to 3 percent slopes	Poorly drained	Depressions on till plains	Loamy till
PdA	Plainfield and Berrien loamy sands, 0 to 3 percent slopes	Excessively drained	Strand plains	Sandy glaciofluvial deposits
PdB	Plainfield and Berrien loamy sands, 3 to 7 percent slopes	Excessively drained	Strand plains	Sandy glaciofluvial deposits
PeB	Plainfield and Ottawa loamy sands, 3 to 7 percent slopes	Excessively drained	Strand plains	Sandy glaciofluvial deposits
PwmaaA	Pewamo clay loam, dense substratum, 0 to 1 percent slopes	Poorly drained	Drainageways on nearshore zones (relict), flats on nearshore zones (relict)	Clayey till over dense till
RbA	Rollin muck, 0 to 3 percent slopes	Very poorly drained	Depressions on till-floored lake plains	Herbaceous organic material over marl
SbA	Sebewa sandy loam, 0 to 3 percent slopes	Poorly drained	Depressions on glacial drainage channels	Loamy over sandy and gravelly glaciofluvial deposits
Sf	Sebewa loam, disintegration moraine, 0 to 2 percent slopes	Poorly drained	Drainageways on stream terraces, drainageways	Loamy drift over sandy and gravelly outwash
WcA	Wauseon loam, 0 to 3 percent slopes	Poorly drained	Depressions on till-floored lake plains	Glaciolacustrine deposits over clayey till

Map Unit Symbol	Map Unit Name	Drainage	Associated Landform(s)	Parent Material
ZfsacA	Ziegenfuss clay loam, 0 to 1 percent slopes	Poorly drained	Wave-worked till plains	Clayey till over loamy till
W	Water	N/A	N/A	N/A

Source: NRCS (2024).

4.2 Historical Land Use

SWCA reviewed historic plat and topographic maps, as these sources provide information on past land use within the Project Area and Study Area that may indicate the probability of encountering significant precontact and postcontact cultural resources in or near the Project Area. The historic maps indicate that there has been a general consistency in the road network and land-use patterns from the late nineteenth century into the modern era in the Study Area.

The earliest available map of the Project Area is an 1819 General Land Office survey map (Bureau of Land Management General Land Office 2024). The Project Area is uninhabited. The River Raisin is drawn as a winding water course east of the Project Area. There are patches of marshlands, and tributaries are marked but not fully drawn. No structures are depicted. Palmyra and Lenawee Junction have not yet been established.

The first available plat map, dated 1874, shows that the Project Area and Study Area had been divided into large landholdings. Residences, schools, and churches are depicted. Roads and three railroads also are in place, including the Lenawee County Railroad and Palmyra Road. The current U.S. Highway 233 is shown as a railroad. Several structures are depicted on landholdings within the Project Area. Some of these structures are adjacent to orchards or small agricultural fields. There are branches of unnamed tributaries flowing throughout the Project Area, one of which is the modern Big Meadow Drain (Everts and Stewart 1874).

By 1893, the Project Area is depicted similarly to the 1874 plat. More landowners have appeared, represented by smaller landholdings, and structures are depicted within the Project Area. The unnamed tributaries are still depicted, running through the central and southern portions of the Project Area (Cadwell 1893).

The 1916 plat map shows an increase in landowners once more as the communities of Lenawee Junction and Palmyra continue to grow. Structures also are depicted on these parcels in the Project Area and are shown mostly along roads. U.S. Highway 233 is depicted as the Toledo Western electric railroad. There is another railroad that runs north-south to the Toledo Western electric railroad, connecting from Adrian to Palmyra within the Project Area. This segment of rail had been a road on the 1874 and 1893 plat maps. Several tributaries also are shown within the Project Area (Ogle 1916).

The 1921 plat map does not show individual structures beyond churches and schools, neither of which are in the Project Area. Landowner names are given, and the road network and railroads appear in the same location as on previous plats (*Adrian Daily Telegram* 1921). The 1928 plat presents the same information (*Adrian Daily Telegram* 1928).

SWCA also reviewed historic topographic maps to determine the land use of the Project Area and Study Area. Four historic topographic maps from 1939 to 1972 show that there has been little development from the early twentieth century to the present (U.S. Geological Survey [USGS] 2024). On the earliest available topographic map (Blissfield, Michigan, 1939, 1958 edition), multiple structures are shown in the

Project Area along roadways. The tributaries shown on the plat maps are named and shown: Big Meadow Drain, Bixby Drain, and Grinnell Drain. The road network and railroads are also depicted. The 1941 Blissfield, Michigan, topographic map reveals a similar image. The 1972 Palmyra, Michigan, and 1972 Tecumseh South, Michigan, topographic quadrangles name most of the roads in the Project Area, and they show that residential development had not increased outside of Palmyra and Adrian. Transmission and telecommunication cables are also depicted (USGS 2024).

A review of 17 aerial photographs taken between 1955 and 2022 indicates that minimal land development occurred within the Project Area and its environs. On the aerial images beginning in 1955, the landscape is agricultural. Isolated farmsteads are visible along roadways outside of Palmyra, Lenawee Junction, and Adrian. Drainages are visible either as scars on the landscape or are lined with trees, as is the River Raisin. There are some stands of trees throughout the Project Area. Between 1955 and 2022, no noticeable changes occur to the land use in the Project Area or Study Area (Historic Aerials 2024).

4.3 Previous Cultural Resources Surveys

A review of MI SHPO records identified one cultural resources survey that was conducted in the Project Area and two cultural resources surveys conducted within the Study Area (Table 2). Project ER00-7.17.161134 was a reconnaissance investigation conducted in 2017 by Archaeological Consultants of Ossian. The survey area covered 0.44 acre of land, and no cultural resources were identified during the survey (Stillwell 2017). Project ER17-391 was conducted for the Howard Street/West Michigan CMAQ and Rehabilitation project; however, the MI SHPO records did not contain information on the surveyors, year, or report title. Project B17-258, identified on quad maps in the MI SHPO research repository as Lauterbur 2016, was a Phase I archaeological survey conducted in support of the replacement of the River Raisin Bridge in Palmyra, Michigan. The MI SHPO records did not include information on the extent of the survey; however, no archaeological sites were identified during the survey.

Table 2. Previous Cultural Resources Surveys in the Study Area

Project ID	Project Name	Survey Year	Surveyors	Report Title	Location
ER00-7.17.161134	G2 Cellular Tower Site Review #161134	2017	Archaeological Consultants of Ossian	<i>An Archaeological Field Reconnaissance of a Proposed Telecommunications Facility (Project #161134) in Palmyra, Lenawee County, Michigan. 17FR29Mi.</i>	Project Area
ER17-391	Howard Street/West Michigan CMAQ and Rehabilitation	None recorded	None recorded	None recorded	Study Area
B17-258	Lauterbur 2016	2016	Michigan Department of Transportation	<i>Archaeological Investigations at US-223 River Raisin Bridge Replacement, Palmyra, Lenawee County.</i>	Study Area

4.4 Previously Recorded Archaeological Sites



[illegible]

SWCA reviewed the National Park Service’s NRHP database for Lenawee County, Michigan, regarding information on historic districts, buildings, archaeological sites, and other properties eligible for or listed in the NRHP. The NRHP database did not identify any NRHP-listed resources within the Project Area (National Park Service 2024).

SWCA also reviewed historic architecture data provided by the MI SHPO in April 2023. No previously recorded architectural resources are located within the Project Area; three architectural resources are located in the Study Area (Table 4; Appendix A: Figure 5).

No recorded cemeteries are present in the Project Area; two postcontact cemeteries (Palmyra Village Cemetery and Crane Cemetery) are located within the Study Area (Table 5; Appendix A: Figure 5). Palmyra Village Cemetery was included in the MI SHPO site file data, while Crane Cemetery was identified through archival research of historic topographic maps. Due to the data gap in the MI SHPO site file records since February 2024, it is not clear if Crane Cemetery is still absent from MI SHPO site file records.

Table 4. Previously Recorded Historic Architectural Resources in the Study Area

Site ID	Historic Name	City	NRHP Status	Location
P23943	Palmyra Presbyterian Church	Palmyra	Unevaluated	Study Area
P61449	Bruce Highway Bridge over Black Creek	Ogden Township	Unevaluated	Study Area
P61451	Scott Highway Bridge over Black Creek	Ogden Township	Unevaluated	Study Area

Table 5. Previously Recorded Cemeteries in the Study Area

Historic Name	Record Source	Location
Palmyra Village Cemetery	MI SHPO site file data	Study Area
Crane Cemetery	Archival research	Study Area

4.6 Geoarchaeology

Geoarchaeology, which is a multidisciplinary field that incorporates topography, geomorphology, geology, and soils, helps archaeologists to understand how geological processes have influenced the preservation of archaeological sites. Research conducted by Monaghan and Lovis (2005) demonstrates that deeply buried soils have an increased probability of sustaining cultural resources where fluvial deposits overlie alluvial deposits as a result of waterways breaching their banks. Monaghan and Lovis developed a predictive geoarchaeological model that takes these effects into account and classifies an area's likelihood of having cultural resources from Low to High-Very High.

Based on the Monaghan and Lovis (2005) model, the Project Area intersects with areas modeled as having moderate to high potential for deeply buried archaeological deposits (Figure A-6).

Otherwise, the remainder of the Project Area is largely mapped as exhibiting a low potential for deeply buried archaeological deposits.

4.7 Cultural Resources Context and Potential

The potential of the Project Area to contain cultural resources was developed through examination of the natural and topographical characteristics of the Project Area and available historic-era maps and aerial photographs.

4.7.1 *Potential for Precontact Archaeological Sites*

[REDACTED]

[REDACTED]

4.7.2 *Potential for Postcontact Archaeological Sites*

[REDACTED]

[REDACTED]

[REDACTED]

5 SUMMARY AND RECOMMENDATIONS

In summary, the records review established that one cultural resources survey has been conducted previously within the Project Area, and two cultural resources surveys have been conducted in the Study Area. These compliance surveys were negative and did not result in the recordation of cultural resources within the Project Area or the Study Area. However, there are six other previously recorded archaeological sites within the Project Area and three archaeological sites within the Study Area. None of the archaeological sites within the Project Area have been evaluated for listing in the NRHP. There are no previously recorded architectural resources within the Project Area and three architectural resources in the Study Area. Based on MI SHPO records and a review of the NRHP, there are no NRHP-listed resources located within the Project Area or Study Area.

There is an overall moderate probability for significant precontact archaeological sites and a low to moderate probability for significant postcontact archaeological sites within the Project Area.

[REDACTED]

Should the project require archaeological survey, the geoarchaeological modeling (Monaghan and Lovis 2005) suggests that shovel testing and/or deep testing (e.g., auguring) may be necessary [REDACTED]

[REDACTED] Pedestrian survey is a viable survey methodology as long as alluvial soils are confined to the plow zone (e.g., 12 inches [30 centimeters]); the limits of shovel testing is typically 3 feet (1 m).

Based on the MPSC regulations and our communications with the MI SHPO (personal communication, Sarah Surface-Evans and Scott Slagor, January 30, 2025), SWCA recommends initiating consultation with the MI SHPO. SWCA understands that MI SHPO has initiated a new consultation process for projects subject to permitting through the MPSC, and that the MI SHPO will provide expert testimony regarding cultural resources to the MPSC. To initiate the consultation process, the MI SHPO requests developers to complete a consultation application, in coordination with a professional archaeologist and architectural historian. The MI SHPO will provide their recommendations for next steps, including survey and avoidance requirements. SWCA understands that RWE will have 1 year after submittal of the MPSC permit application to obtain the approval of survey reports or recommendations submitted to the SHPO.

In keeping with Public Act 233, which requires the project proponent to identify and provide information on cultural resources potentially affected by the project to the MPSC, SWCA recommends this document be provided to the MPSC for review. Approval from the MPSC is required before development within the boundaries of these sites occurs.

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APPENDIX A

Figures

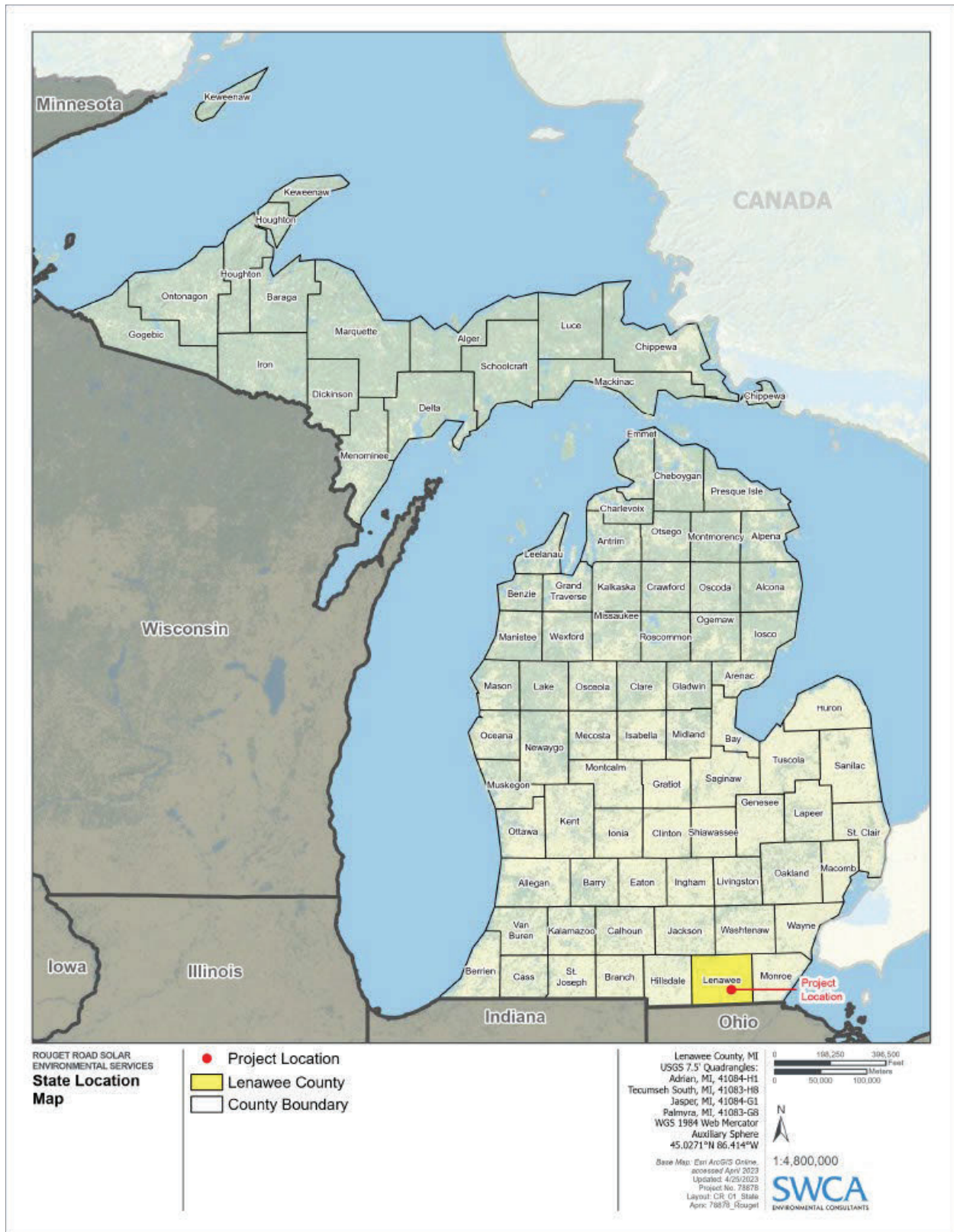


Figure A-1. Location of the proposed Rouget Road, LLC Area in Michigan.

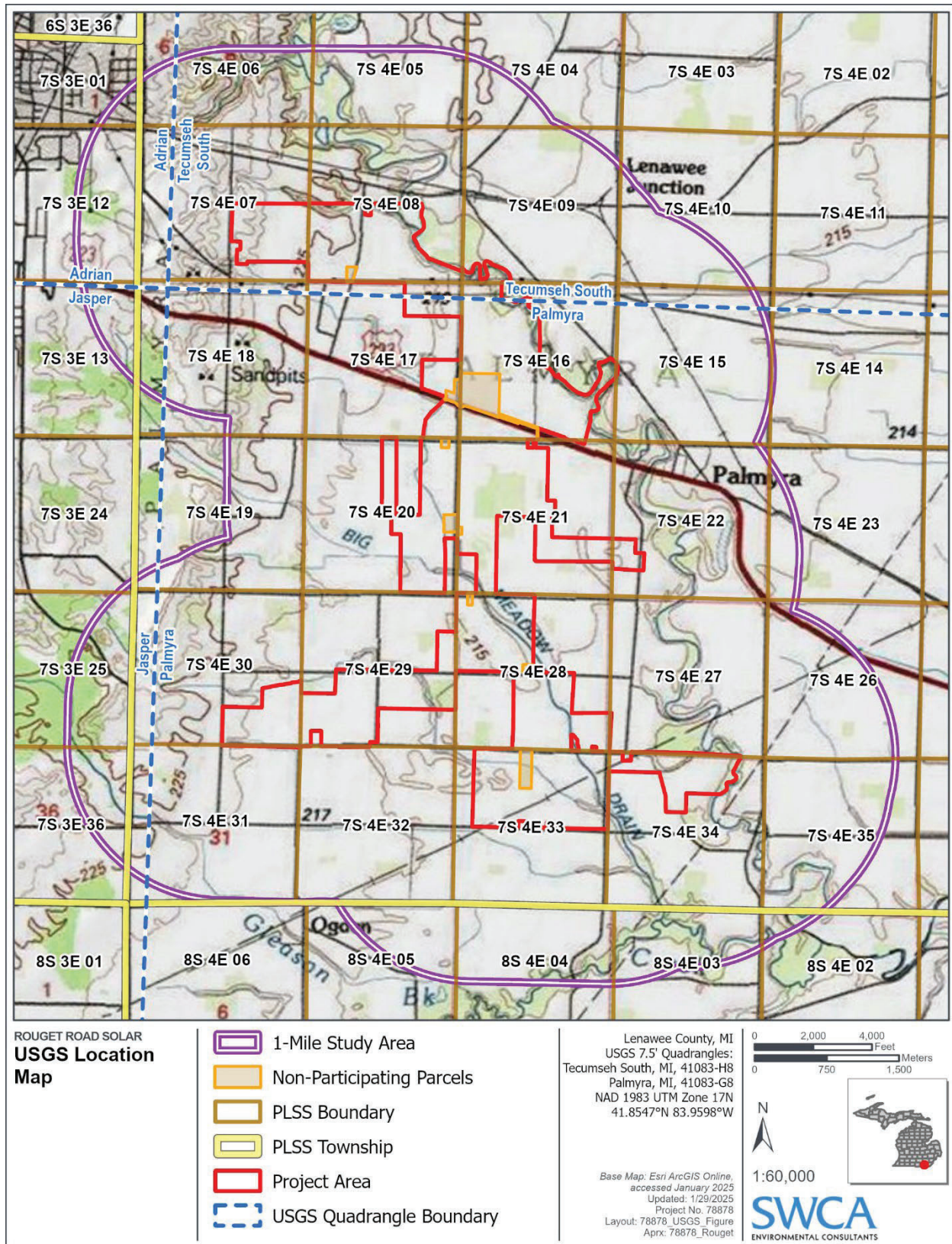


Figure A-2. Location of the Study Area for the proposed Rouget Road, LLC on a USGS topographic map.

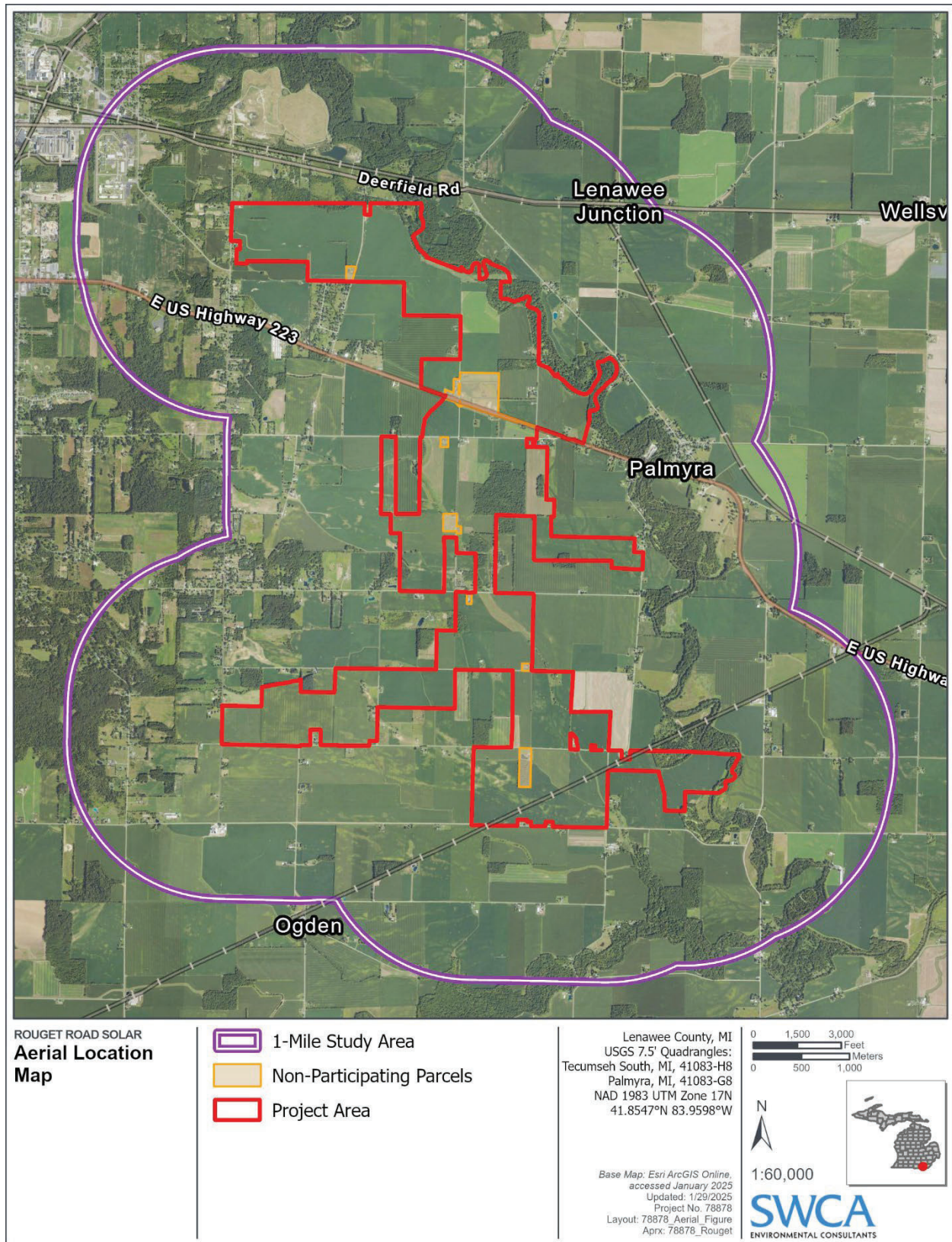


Figure A-3. Overview of the Study Area for the proposed Rouget Road, LLC on aerial imagery.

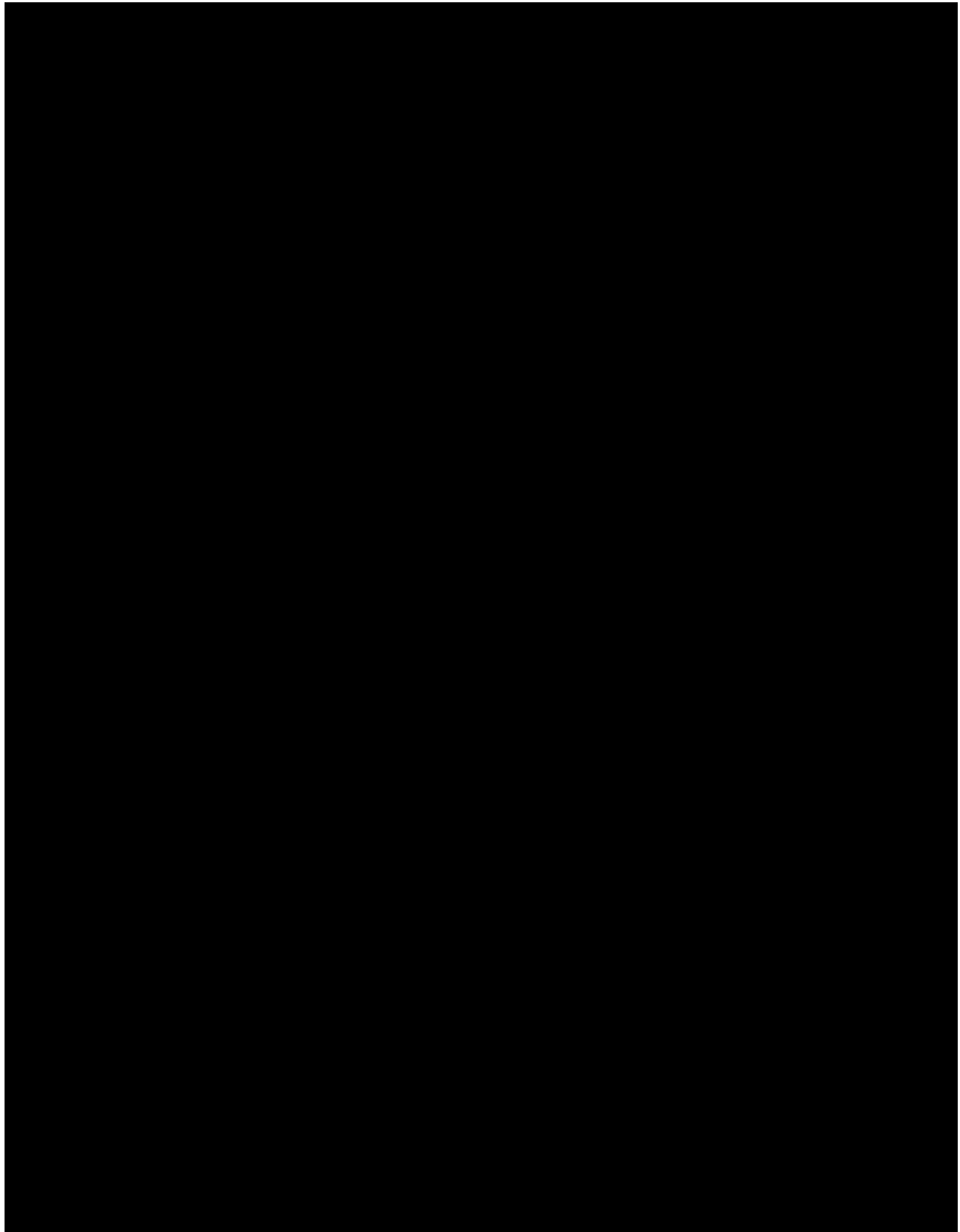


Figure A-4. Results of the background research for previously recorded cultural resources and previously conducted surveys.

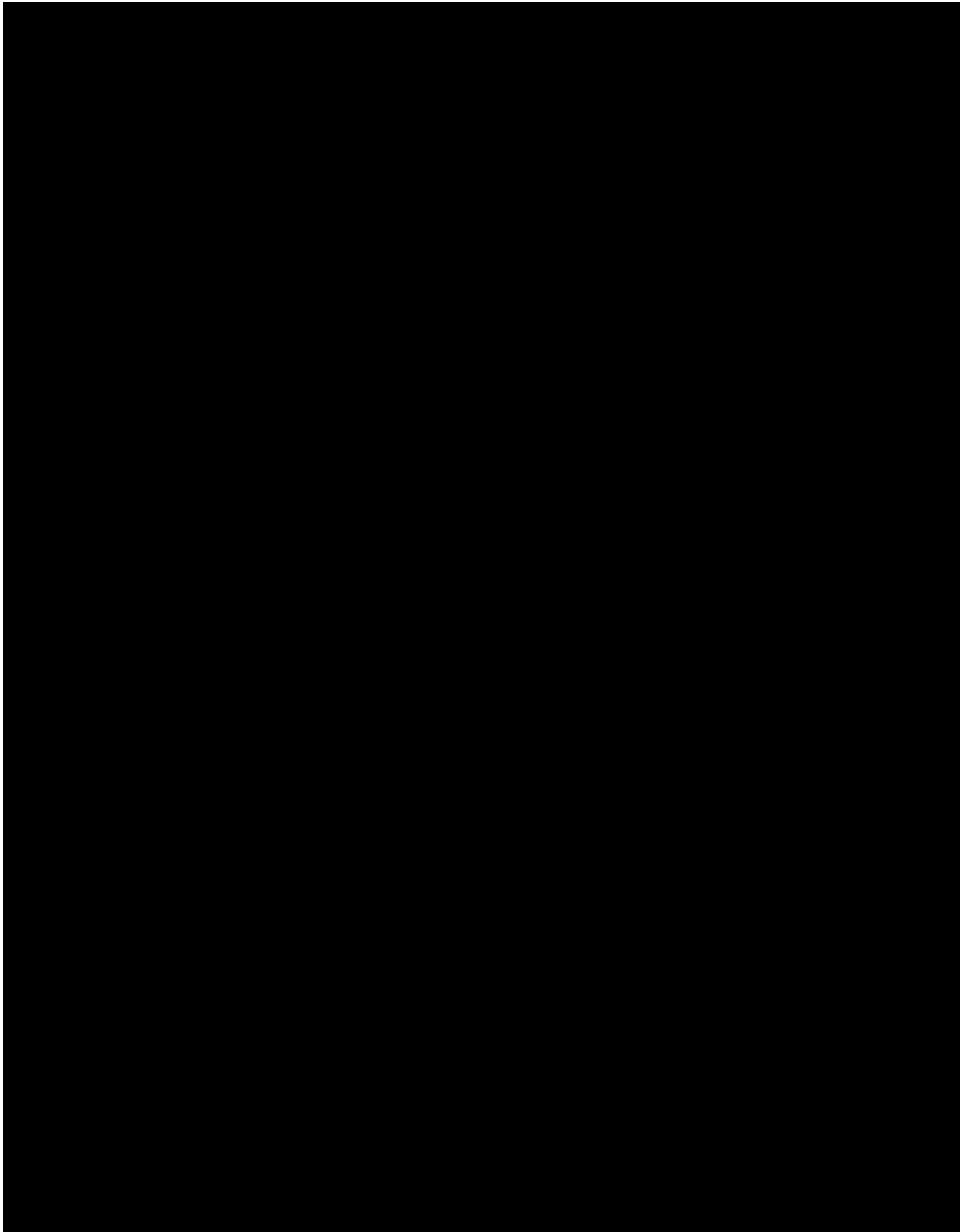


Figure A-5. Results of the background research for postcontact architectural resources and cemeteries.

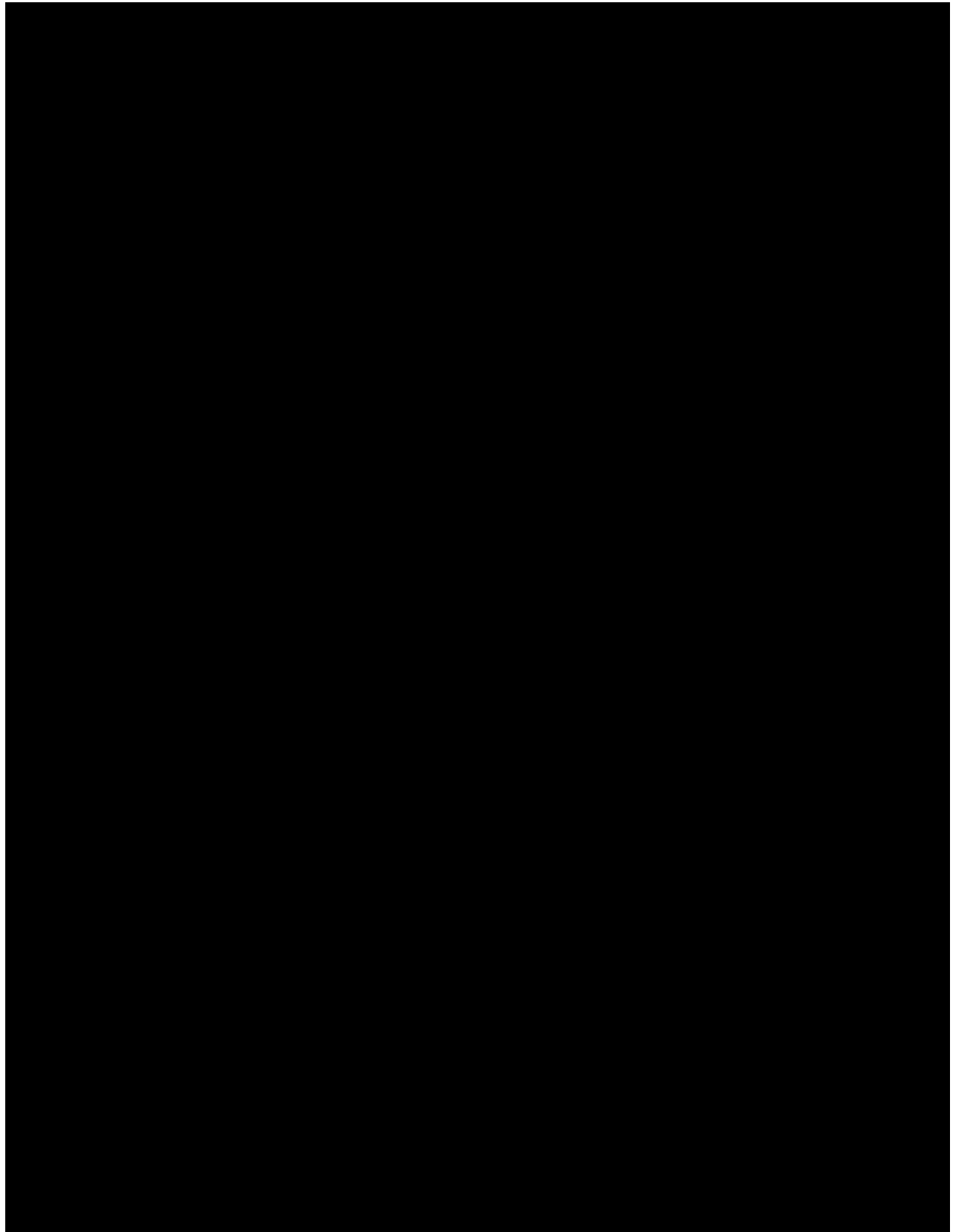


Figure A-6. Areas modeled as having moderate to high potential for deeply buried archaeological deposits in the Project Area and Study Area.



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.
PRESIDENT

September 10, 2025

KEVIN COLE
ROUGET ROAD LLC
10250 PENLAWN DR.
JEROME, MI 49249

RE: SR25-23 PA233 Review Rouget Road, LLC Solar, T07S/R04E/Sec. 7, 8, 9, 15, 16, 17, 20, 21, 22, 27, 28, 29, 30, 33, and 34, Palmyra Township, Lenawee County (MPSC)

Dear Mr. Cole:

We have received your request for review of the above-cited project under Public Act 233 of 2023 for Renewable Energy and Energy Storage Facility Siting (PA 233) at the above-noted location. We have reviewed the assessment prepared by SWCA, "Cultural Resources Desktop Review for the Rouget Road, LLC, Lenawee County, Michigan" and appreciate the information provided. To fully consider and address impacts to cultural and historic sites we require additional information, please send the following:

General

In the materials submitted, the project area boundaries in the submission form and in the Desktop Review do not match. Please ensure that we have the final project boundary maps included in all materials submitted to our office. Desktop Review states that the project plan will avoid archaeological sites, however, the project mapping provided does not make this apparent or clear. We cannot assess the impact of the proposed project on historic resources without accurate mapping information. Additionally, we would like to see the locations of staging areas, vehicle traffic, and any other areas that may have ground disturbance mapped.

Archaeological Resources

Due to the presence of previously documented sites within and near the project area, and the high archaeological sensitivity for the River Raisin valley generally, SHPO requests full archaeological survey for the entire project area, including staging areas. In particular, the boundaries of site 20LE28 are poorly delineated. In order to avoid this site, which is known to contain burials, additional survey methodologies may be necessary beyond pedestrian survey or shovel testing. ***SHPO recommends consulting with our office and Tribal Nations with historic connections to this region to develop an appropriate methodology***, which may include geophysical prospection or historic human remains detection dog (HRD) survey. SHPO also recommends developing an Unanticipated Discovery Plan (UDP) for the project. A UDP specifies who will be contacted and what measures will be taken in the event of an unanticipated discovery of archaeological materials or human remains during the project implementation. Please see the UDP template attached, for an example of how these documents are organized. SHPO encourages the project proponent to work with consulting party tribes to develop an



appropriate UDP and protocol for handling human remains.

Above-ground Resources

SHPO concurs with the proposed methodology of utilizing the Above Ground Table in lieu of identification forms except that we require identification forms for properties that are identified as eligible. The table does not provide enough information for eligible properties. For eligible properties, photographs of all resources must also be included in an attachment with [Architectural Properties Identification Form](#). When discussing effects to above-ground resources, please be sure to provide discussion of visual impacts as well as visual barriers in place that may play in to effects determinations. Also be sure that the Historic Resource Survey Report contains enough history and contextual information about the area and resources for SHPO to adequately assess eligibility.

Additional information must be submitted online through our [Additional Information Portal](#).

Please note that our review cannot proceed until we are able to consider the information requested above. This letter is not concurrence. If you have any questions, please contact please contact Senior Archaeologist, Sarah Surface-Evans, surfaceevanss1@michigan.gov, (517) 282-7959 or Historian, Katlyn Burns Yancho, at 517-256-3416, burnsyanchok@michigan.gov. **Please reference our project number in all communication with this office regarding this review.** Thank you for your consultation.

Sincerely,



Sarah Surface-Evans, PhD, RPA
Senior Archaeologist

SES:KAK:KBY:SSE

Enclosure(s): UDP Template

Copy: Anna Gilmer, SWCA

Unanticipated Discoveries Plan

[INSERT: FEDERAL AGENCY, PROJECT NAME, LOCATION, DATE**]**

Purpose

This document outlines the procedures to prepare for and address the unanticipated discovery of historic properties or human remains. It provides direction regarding the proper procedures to follow in the event that unanticipated cultural materials or human remains are encountered during construction. An unanticipated discovery can result when previously undocumented or unknown historic properties are discovered during the course of projects.

Historic structures or buildings can be districts, sites, buildings, structures, or objects significant in American history, architecture, engineering, archaeology, or culture at the national, State, or local level. Sometimes elements of historic buildings or structures may be hidden by recent additions or alterations. For example, siding may obscure the historic character of a historic home or log cabin.

Cultural materials include human-made objects (both pre-contact and historic period) and features (e.g., foundation walls, hearths, middens, or other remnants of cultural activity) that are part of an archaeological site. Examples of cultural materials include:

- An accumulation of shell, burned rocks, or other food related materials,
- Bones or small pieces of bone,
- An area of charcoal or very dark stained soil with artifacts,
- Stone tools or waste flakes (i.e., an arrowhead, or stone chips),
- Clusters of tin cans or bottles,
- Logging or agricultural equipment that appears to be older than 50 years,
- Buried railroad tracks, decking, or other industrial materials.

Human remains are physical remains of a human body or bodies, including, but not limited to, bones, teeth, hair, ashes, and preserved soft tissues (mummified or otherwise preserved) of an individual. Remains may be articulated or disarticulated bones or teeth. Any human skeletal remains, regardless of antiquity or ethnic origin, will at all times be treated with dignity and respect.

Procedures for Historic Structures & Buildings or Archaeological Discoveries

- 1) STOP WORK. If any employee, contractor, or subcontractor believes that he or she has uncovered cultural materials relating to an archaeological site or historic structure or building at any point in the project, all work at and adjacent to the discovery must stop. The discovery location should be secured at all times. Minimize movement of vehicles and equipment in area immediately surrounding the discovery.
- 2) CONTACT. If the discovery does not appear to be human remains, the applicant will contact **AGENCY** and **AGENCY** will notify the SHPO/THPO of the discovery and the possible actions within two business days of discovery if the discovery occurs Monday through Friday. If the discovery occurs during a weekend or Federal holiday, **AGENCY** will notify the SHPO/THPO on the first working day after the weekend and/or holiday. The

SHPO/THPO will respond within 48 hours of the notification or on the first working day if preceded by a weekend or holiday. AGENCY will take into account the SHPO's/THPO's recommendations and advise the Applicant to carry out appropriate and specific actions.

3) EVALUATE.

Historic buildings and structures will be identified and evaluated by qualified professional who shall meet, at a minimum, the Secretary of Interior's Professional Qualification Standards (44 FR 44738-9) in History or Architectural History.

- a) If the historian determines that the discovery is not a cultural resource, they will immediately advise AGENCY in writing and will notify the SHPO/THPO of their findings.
- b) If the historian determines that the discovery is a cultural resource, they will immediately advise AGENCY and AGENCY will notify the SHPO/THPO. and complete Architectural Properties Identification Forms for each newly identified cultural resource.
 - i) If the resource is not significant, the historian will document the discovery in a report (including photographs of the discovery site). The report must also include the completed identification forms and an explanation of why they believe the resource is not significant. The historian will formally request permission from AGENCY and SHPO/THPO for construction to recommence.
 - ii) SHPO and identified tribal representatives will be invited to observe the implementation of any proposed work.
 - iii) If the resource is believed to be significant, the historian will document the discovery in a report (including photographs of the discovery site). The report must also include the completed identification forms and an explanation of why they believe the resource is significant and a proposal for mitigation or data recovery. Then based on this information, AGENCY and SHPO/THPO will consider mitigation efforts.

Archaeological discoveries will be identified and evaluated by a qualified professional who shall meet, at a minimum, the Secretary of Interior's Professional Qualification Standards (44 FR 44738-9) for archeologists. The professional archaeologist will examine the location of the discovery. All work to evaluate significance and Project effects will be confined to the Project's potential area of impact. The costs of such professional services will generally be the responsibility of the Applicant.

- a) If the archaeologist determines that the discovery is not a cultural resource, the archaeologist will immediately advise AGENCY in writing and will notify the SHPO/THPO of their findings.
- b) If the archaeologist determines that the discovery is a cultural resource, the archaeologist will immediately advise AGENCY and AGENCY will notify the SHPO/THPO. The SHPO will assign an Archaeological Site Number to the discovery.
 - iv) If the resource is not significant, the archaeologist will document the discovery in a report (including photographs of the discovery site). The report must also include a completed site form for the discovery and an explanation of why they

believe the resource is not significant. The archaeologist will formally request permission from AGENCY and SHPO/THPO for construction to recommence.

- v) SHPO and identified tribal representatives will be invited to observe the implementation of any proposed work.
 - vi) If the resource is believed to be significant, the archaeologist will document the discovery in a report (including photographs of the discovery site). The report must also include a completed site form for the discovery and an explanation of why they believe the resource is significant and a proposal for mitigation or data recovery. Then based on this information, AGENCY and SHPO/THPO will consider mitigation efforts.
- 4) MITIGATE. For resources that are deemed significant, AGENCY and its Applicant will consult with the SHPO/THPO on measures to avoid further impacts to the discovery. If the SHPO/THPO does not object to AGENCY's recommendations, AGENCY will require the Applicant to modify the project design plans to implement any recommendations. If the SHPO/THPO objects to the recommendations, AGENCY and the SHPO/THPO will consult further to resolve the objection through actions including, but not limited to, identifying project alternatives that may result in the undertaking having no adverse effect on historic properties. The costs of such recovery and recordation will generally be the responsibility of the Applicant.
- a) When an Applicant's project cannot be modified and will have adverse effects on an archaeological property, AGENCY may treat the adverse effect by providing for the recovery of significant information through archaeological data recovery or other scientific means. To accomplish this objective, AGENCY will follow the Council's "Recommended Approach for Consultation on Recovery of Significant Information from Archaeological Sites" published in the Federal Register (64 FR 27085, May 18, 1999); and consult with the other consulting parties to prepare a data recovery plan, including material and record curation provisions. A report of data recovery efforts must be completed and submitted to the SHPO/THPO for review.
 - b) For sites where AGENCY determines other treatment measures are appropriate, AGENCY will consult further with the other consulting parties to develop an appropriate approach to resolving the adverse effects.

Procedures for the discovery of human skeletal materials and associated funerary items

1. STOP WORK. If any employee, contractor, or subcontractor believes that he or she has uncovered skeletal remains at any point in the project, all work adjacent to the discovery must stop. The discovery location should be secured at all times. Minimize movement of vehicles and equipment in area immediately surrounding the discovery.
2. CONTACT. Notify the appropriate local law enforcement agency and AGENCY immediately. Law enforcement will then determine if the remains are human, and whether the discovery constitutes a crime scene.
 - a. If the police determine that human remains represent evidence of a crime or missing person, they will complete their investigation.
 - b. If skeletal remains are determined to be non-human and there is no archaeological association, then AGENCY will notify SHPO/THPO and work can proceed.

- c. If the police determine that human remains do not represent evidence of a crime or missing person, but an archaeological burial site, then **AGENCY** will notify SHPO/THPO and in consultation with the SHPO/THPO a recovery plan will be developed. In most cases, it is preferred that burial sites be preserved, adequately documented, and maintained in place. If this is not possible, the remains and any associated materials would need to be moved for their protection. The following sequence of steps will be employed if it is not possible to preserve and maintain an inadvertently discovered burial in place:
3. DOCUMENT. A qualified archaeologist experienced in human remains recovery shall document and recover the remains and any related materials that may be present. Archaeological expertise is important in documenting the discovery context and evaluating whether the remains are isolated or if additional remains may be immediately present. Archaeological recovery may be done under the auspices of law enforcement. If law enforcement chooses not to be involved, a permit for disinterment must be obtained from the local Department of Public Health, or through a court order.
 - a. Documentation and recovery shall be respectful and conducted out of public view, to the extent possible.
 - b. As soon as possible, the remains shall be examined by a physical anthropologist using standard non-invasive methods and procedures to create a basic biological profile and estimate ethnicity. Known or suspected Native American Ancestors or other materials subject to NAGPRA will not be moved, touched, or further disturbed after discovery until completion of Tribal consultation or emergent circumstances arise.
 - c. If it can be determined immediately that a discovery is, or has the potential to be, a Native American Ancestor and/or other materials subject to NAGPRA (i.e., associated or unassociated funerary objects, sacred objects, and objects of cultural patrimony), the THPOs will be notified within 48 hours of discovery and potential identification. Tribal notification and consultation will be coordinated by **AGENCY** and SHPO.
 - d. After notification and initial consultation, consulting Tribes may request that all federally recognized Tribes likely to be culturally affiliated with the discovery be notified in writing by mail or email and further consultation initiated regarding the cultural affiliation, care, handling, excavation (if necessary), and/or disposition per NAGPRA.
 - e. Accommodations will be made for traditional or ceremonial practices in association with discoveries. Consulting Tribes will be afforded opportunities to employ proper traditional cultural practices and treatments during periods of non-Tribal holding of discoveries.
 - f. Photographs shall not be taken, except when necessary for identification and documentation. Tribes may request that any photographs of Native American Ancestors or other materials subject to NAGPRA be destroyed or repatriated at the end of the project.
 - g. Pending consultations, documentation of the discovery will include a written description, mapping and sketching, and precise GPS coordinates. This documentation will be curated with other project records and not be published or made publicly available in any way.

- h. To ensure the protection, preservation, and proper respectful treatment of any discovered materials, pursuant to applicable law, the nature and location of any discovery shall remain confidential as best as reasonably possible given the circumstances and location. Only those persons and entities identified in this plan shall be notified of the discovery or given information about the discovery. AGENCY and related contractors will ensure all staff and consulting personnel are appropriately trained for their respective roles in implementing this plan.
 - i. The permanent care of Native American Ancestors and materials subject to NAGPRA will be determined by the appropriate Tribe or Tribes in consultation with the SHPO.
- 4. REPORTING. Draft and final archaeological reports, with related physical anthropological reports and law enforcement case documentation appended, will be submitted to AGENCY, SHPO, and consulting THPOs.

Contact Information

STATE HISTORIC PRESERVATION OFFICE

Scott Slagor

Cultural Resource Protection Manager

(517)285-5120

slagors2@michigan.gov

Sarah Surface-Evans, Ph.D., RPA

Senior Archaeologist

(517)282-7959

surfaceevanss1@michigan.gov

TRIBAL HISTORIC PRESERVATION OFFICERS

[List THPOs to contact]

LAW ENFORCEMENT

[List local law enforcement to contact]

Jonathan Libbon

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Wednesday, February 25, 2026 2:34 PM
To: Jonathan Libbon
Cc: Quarles, Mark; Cole, J Kevin; Carol Mcknight; Aleyda Galan; Slagor, Scott (LEO)
Subject: RE: Rouget Road Solar (SR25-23) - Tribal Engagement

Sensitivity: Private

Hi Jon,

Thanks for this context. Unfortunately, I am not available during that time on Friday March 6th, as this is the same time that our State Historical Review Board is meeting. Is there another time we could meet?

Thanks,
Sarah



Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

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A formal agenda will be provided next week.

Please let me know if you have further questions.

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Jon

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724.316.5547

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Thanks,

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Jonathan R. Libbon, RPA | he, him, his
Cultural Resources Director

SWCA Environmental Consultants
80 Emerson Lane, Suite 1306
Bridgeville, Pennsylvania 15017
P 724.316.5547 | O 412.839.1001 ext. 5509



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Sensitivity: Private

I have no availability on Thursday. On Monday the 9th, I'm available all day except 11am-1pm.



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What does your availability look like on Thursday (3/5) and early the following week?

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300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

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From: Jonathan Libbon <JLibbon@swca.com>
Sent: Wednesday, February 25, 2026 1:49 PM
To: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>; Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Subject: RE: Rouget Road Solar (SR25-23) - Tribal Engagement
Sensitivity: Private

CAUTION: This is an External email. Please report suspicious emails via the "Report to Abuse" button in Outlook

Good Afternoon Sarah,

Just bringing this to the top of your inbox. Please let me know if you are not the right contact for this request.

Thanks,

Jon

Jonathan Libbon
724.316.5547

From: Jonathan Libbon
Sent: Tuesday, February 24, 2026 10:49 AM
To: Surface-Evans, Sarah (LEO) <surfaceevanss1@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>
Subject: Rouget Road Solar (SR25-23) - Tribal Engagement
Sensitivity: Private

Good Morning Sarah,

We received correspondence from the Gun Lake Tribe (Match-E-Be-Nash-She-Wish band of Pottawatomi Indians) indicating that they wish to consult on the Rouget Road Solar project. We are planning on meeting with them as well as Jennifer Brooks from the MPSC on Friday March 6th, between 11 am to 2 pm. Would you be available for an hour call during that time frame?

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his
Cultural Resources Director

SWCA Environmental Consultants
80 Emerson Lane, Suite 1306
Bridgeville, Pennsylvania 15017
P 724.316.5547 | O 412.839.1001 ext. 5509



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Jonathan Libbon

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Tuesday, March 24, 2026 2:48 PM
To: Kaila Akina; Jonathan Libbon
Cc: Jennifer Jordan Hall
Subject: RE: Rouget Road Solar: [REDACTED]

Sensitivity: Private

Hi Kaila,

Thanks for this update and contexts. I think that the strategy you're suggesting makes sense based on where we suspect the greatest sensitivity is located within the project area. SHPO supports this plan.

All the best,
Sarah



Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

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From: Kaila Akina <Kaila.Akina@glt-nsn.gov>
Sent: Tuesday, March 24, 2026 2:22 PM
To: Jonathan Libbon <JLibbon@swca.com>
Cc: Jennifer Jordan Hall <jjhall@kyk9.org>; Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Subject: Re: Rouget Road Solar: [REDACTED]
Sensitivity: Private

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Good afternoon, Jon,

I'm following up on two items. Are you able to share an updated map showing where ground disturbing activities will be in the project area? I thought one of the team showed us one in the meeting we had.

[REDACTED]

[REDACTED]

Anyways, I'm hoping this makes sense and helps. I would also like to propose that we hop on a call to further discuss to ensure we're on the same page. Looking forward to hearing from you.

Migwetth (Thank you),
Kaila

Kaila Akina

Assistant Director/Deputy THPO

Gun Lake Tribe – Tribal Historic Preservation Office

(Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians)

2872 Mission Dr.

Shelbyville, MI 49344

{p} 269.397.1780, ext. 1240

{c} 269.370.2503



From: Jonathan Libbon <JLibbon@swca.com>

Sent: Tuesday, March 17, 2026 11:14 AM

To: Phillip Peters <phillip.peters@glt-nsn.gov>

Cc: Kaila Akina <Kaila.Akina@glt-nsn.gov>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carolyn Stewart <Carolyn.Stewart@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>

Subject: Rouget Road Solar: [REDACTED]

CAUTION: This email was sent from outside of Gun Lake Tribe. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning Phillip,

I hope you are doing well. I wanted to follow up our call from a few weeks back and see if you could share the contact information for the [REDACTED] that your office has worked with in the past? We would like to solicit quotes from them to assist on the Rouget Road Project.

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his

Cultural Resources Director

SWCA Environmental Consultants
80 Emerson Lane, Suite 1306

Bridgeville, Pennsylvania 15017

P 724.316.5547 | O 412.839.1001 ext. 5509



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Jonathan Libbon

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Thursday, June 4, 2026 7:39 AM
To: Jonathan Libbon; Kaila Akina; Lakota Pochedley; Cordero, Gustavo (LARA)
Cc: Quarles, Mark; Cole, J Kevin; Carol Mcknight; Aleyda Galan; Carolyn Stewart
Subject: Re: Rouget Road - [REDACTED] and Next Steps

Sensitivity: Private

Hi all,

I can't make it either day this week. But I'm fairly open next Friday if you want to suggest some times.

Best,
Sarah

From: Jonathan Libbon <JLibbon@swca.com>
Sent: Wednesday, June 3, 2026 3:46:15 PM
To: Kaila Akina <Kaila.Akina@glt-nsn.gov>; Lakota Pochedley <Lakota.Pochedley@glt-nsn.gov>; Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>; Cordero, Gustavo (LARA) <CorderoG@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>; Carolyn Stewart <Carolyn.Stewart@swca.com>
Subject: Rouget Road - [REDACTED] and Next Steps

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Good Afternoon,

I wanted to reach out and see what everyone's availability is to have a discussion regarding the [REDACTED] Rouget Road project. The Project team is available to discuss the results and next steps:

- Thursday (6/4): 12 (ET)
- Friday (6/5): 11-1 (ET)

If these times do not work, please let me know what your schedule looks like on Thursday and Friday of next week.

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his

Cultural Resources Director

SWCA Environmental Consultants

80 Emerson Lane, Suite 1306

Bridgeville, Pennsylvania 15017

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Jonathan Libbon

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Thursday, June 18, 2026 12:15 PM
To: Jonathan Libbon; Lakota Pochedley
Cc: Kaila Akina; Quarles, Mark; Cole, J Kevin; Aleyda Galan; Carol Mcknight
Subject: RE: Rouget Road Solar (SR25-23) - Results Mapping

Sensitivity: Private

Hi Jon,

Essentially yes. I don't think I received the map below. It's helpful, but if you could include an overlay of the project design/buffer that would be even better.

Thanks,
Sarah

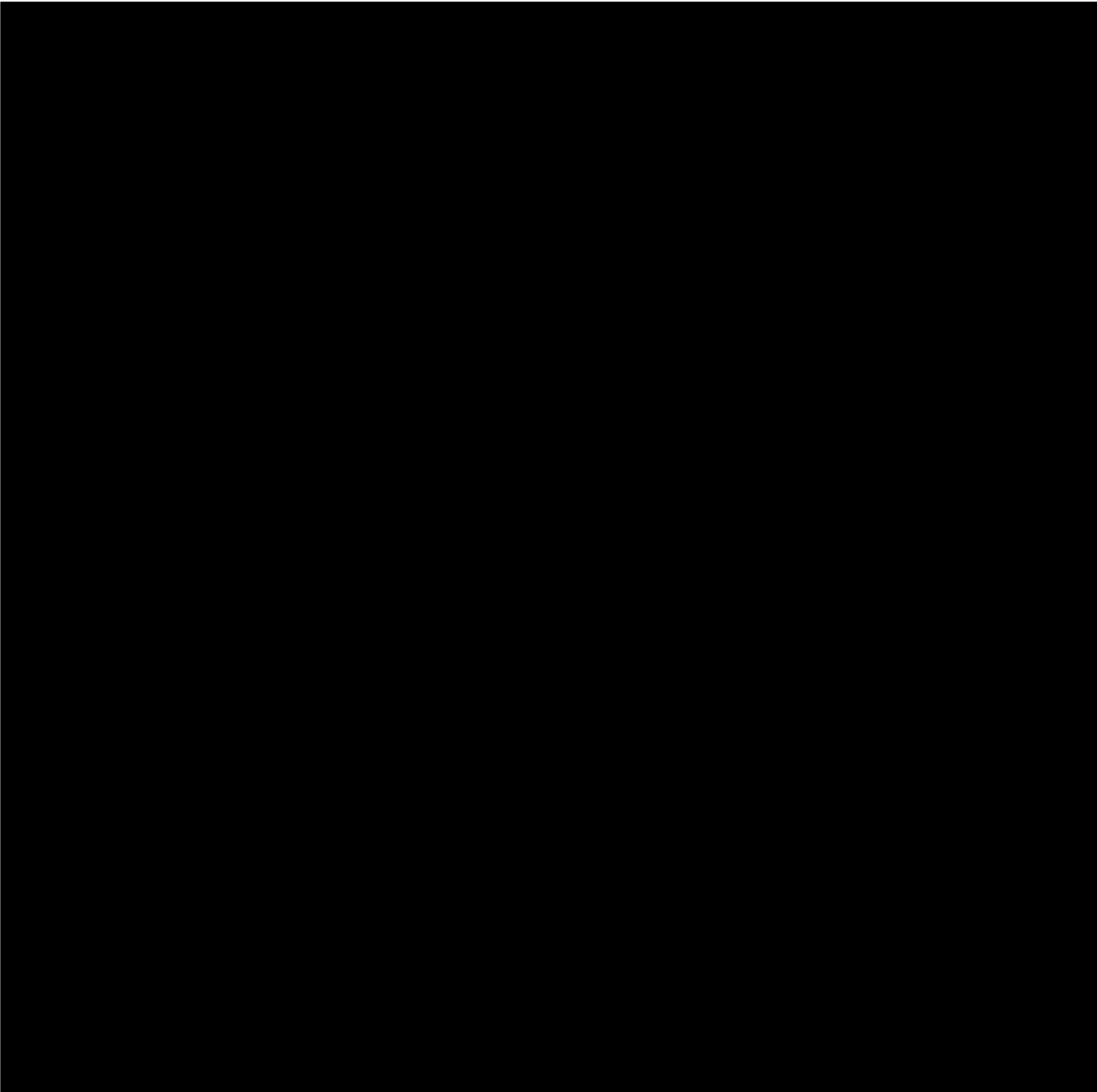


Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

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From: Jonathan Libbon <JLibbon@swca.com>
Sent: Thursday, June 18, 2026 12:01 PM
To: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>; Lakota Pochedley <Lakota.Pochedley@gltnsn.gov>
Cc: Kaila Akina <Kaila.Akina@gltnsn.gov>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: RE: Rouget Road Solar (SR25-23) - Results Mapping
Sensitivity: Private

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Jonathan Libbon
724.316.5547

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Thursday, June 18, 2026 11:53 AM
To: Jonathan Libbon <JLibbon@swca.com>; Lakota Pochedley <Lakota.Pochedley@gltnsn.gov>
Cc: Kaila Akina <Kaila.Akina@gltnsn.gov>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: RE: Rouget Road Solar (SR25-23) - Results Mapping
Sensitivity: Private

Hi Jonathan,

Is it possible to make these maps to include the locations of archaeological materials found during survey as well? That would be very helpful.

Thanks,
Sarah



Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

Learn more about the [SHPO Archaeology Program!](#)

From: Jonathan Libbon <JLibbon@swca.com>
Sent: Thursday, June 18, 2026 11:50 AM
To: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>; Lakota Pochedley <Lakota.Pochedley@glt-nsn.gov>
Cc: Kaila Akina <Kaila.Akina@glt-nsn.gov>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: RE: Rouget Road Solar (SR25-23) - Results Mapping
Sensitivity: Private

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Good Morning Sarah and Lakota,

I wanted to follow up and share the mapping that was discussed during our call last week, which shows the design around the [REDACTED] With the attached information and the maps we sent yesterday, we are hoping to receive some preliminary input on the proposed setbacks.

We understand that a full evaluation will require review of the Phase I report. However, based on the information provided, any preliminary comments you can offer regarding the proposed avoidance measures would be appreciated.

Thanks,

Jon

Jonathan Libbon
724.316.5547

From: Jonathan Libbon
Sent: Wednesday, June 17, 2026 5:26 PM
To: Surface-Evans, Sarah (LEO) <surfaceevanss1@michigan.gov>; Lakota Hobia <lakota.hobia@glt-nsn.gov>
Cc: Kaila Akina <kaila.akina@glt-nsn.gov>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: Rouget Road Solar (SR25-23) - Results Mapping
Sensitivity: Private

Good Afternoon Sarah and Lakota,

Attached is the mapping discussed during our call last week. Please let me know if you have any questions or if you need anything clarified.

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his
Cultural Resources Director

SWCA Environmental Consultants
80 Emerson Lane, Suite 1306
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Jonathan Libbon

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Monday, June 22, 2026 3:02 PM
To: Jonathan Libbon
Cc: Quarles, Mark; Cole, J Kevin; Aleyda Galan; Benjamin Demchak; Carol Mcknight
Subject: RE: Rouget Road (SR25-23): Trinomial Request
Attachments: 20LE447 to 461 request.xlsx

Sensitivity: Private

Hi Jon,

Please find your assigned trinomials attached, **20LE447 through 20LE461**.

Terrestrial Archaeological Site Form: [michigan-terrestrial-site-form2.docx](#)

For all site forms, including forms for revisiting an existing site, complete the site form and attach maps and relevant artifact photos to the document. Save the word document with all attachments as a single pdf file for each site form. Shapefiles for all site boundaries and the survey areas ([archaeology-standards-guide-3.pdf](#)) must be submitted with the site forms. If the sites were identified during a Section 106 survey, the site forms must also be included as appendices in the technical report submit through the SHPO Section 106 portal.

Best,
Sarah



Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

Learn more about the [SHPO Archaeology Program!](#)

From: Jonathan Libbon <JLibbon@swca.com>
Sent: Monday, June 22, 2026 11:22 AM
To: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Benjamin Demchak <BDemchak@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: Rouget Road (SR25-23): Trinomial Request
Sensitivity: Private

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We would like to request trinomials for the newly documented resources identified on Rouget Road, in Lenawee County. The table below (and attached) provides an overview of the resources. After receiving the trinomials, we'll incorporate them in the report as well as provide full site forms detailing the sites. Please let us know if you need any additional information to assign the site numbers.

[illegible]

Jon

SWCA Environmental Consultants
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Bridgeville, Pennsylvania 15017
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Jonathan Libbon

From: Jonathan Libbon
Sent: Thursday, July 2, 2026 12:10 PM
To: Surface-Evans, Sarah (LEO); Slagor, Scott (LEO)
Cc: Quarles, Mark; Cole, J Kevin; Aleyda Galan; Carol Mcknight
Subject: Rouget Road Solar (SR 25-23) Phase I Archaeology Report

Sensitivity: Private

Good Afternoon Scott and Sarah,

The link below leads to the Phase I archaeology report for the Rouget Road Solar Project. The document contains the background research, the results of our survey, updated design plans [REDACTED] [REDACTED] as well as the associated site forms for the resources we documented during the survey.

☐ [Rouget Road Phase I Archaeology Report \(SR25-23\)](#)

If you have any questions about the document or our results/recommendations, please let me know. Our GIS team is pulling together the associated spatial data for the survey area and site boundaries. I'll have that info over to you later today or early next week.

Please let me know if you're able to access the document and add it to the review queue. If you encounter any issues, we can use Dropbox or another FTP server that may work better.

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his
Cultural Resources Director

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80 Emerson Lane, Suite 1306
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Phase I Archaeology Survey Report for the Rouget Road Solar Project (July 2026)

This report contains information regarding the nature and location of archaeological resources and cultural heritage sites. Such information is considered sensitive, privileged, and confidential and is protected from public disclosure under applicable federal laws, regulations, and guidance governing archaeological and historic properties.

Accordingly, the Phase I Archaeological Survey Report is being withheld from this filing to protect sensitive cultural resource information.

The Applicant will provide the report directly to authorized reviewing agencies and other entities entitled to receive such information, subject to appropriate confidentiality protections and applicable law.

Jonathan Libbon

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Friday, July 17, 2026 10:30 AM
To: Jonathan Libbon; Slagor, Scott (LEO)
Cc: Quarles, Mark; Cole, J Kevin; Carol Mcknight; Aleyda Galan
Subject: RE: Rouget Road – Review Status Before Your Departure

Sensitivity: Private

Hi Jon,

EOG = governor's office. I really can't answer any of these questions because I wasn't in the meetings. I would reach out to Scott for more information.

Best,
Sarah



Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

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From: Jonathan Libbon <JLibbon@swca.com>
Sent: Thursday, July 16, 2026 11:58 AM
To: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>; Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>
Subject: RE: Rouget Road – Review Status Before Your Departure
Sensitivity: Private

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Good Morning Sarah,

Thank you for the update. What do you mean by EOG? Would you be able to provide some context on how this may affect our MPSC application and what implications the EOG will have on your office's role in reviewing these projects?

Thanks,

Jon

Jonathan Libbon
724.316.5547

From: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Sent: Wednesday, July 15, 2026 9:50 AM
To: Jonathan Libbon <JLibbon@swca.com>; Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>
Subject: RE: Rouget Road – Review Status Before Your Departure
Sensitivity: Private

Hi Jon,

I'm adding Scott Slagor to this discussion, because much of this is his call. Unfortunately, I will not be able to review the report before I leave. Also, we've had some developments with the EOG that may affect whether/how we conduct these reviews, so there are a lot of unanswered questions.

Best,
Sarah



Dr. Sarah Surface-Evans, RPA
(they/them, she/her)
Senior Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Office: 517.282.7959
michigan.gov/shpo

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From: Jonathan Libbon <JLibbon@swca.com>
Sent: Wednesday, July 15, 2026 9:47 AM
To: Surface-Evans, Sarah (LEO) <SurfaceEvansS1@michigan.gov>
Cc: Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>
Subject: Rouget Road – Review Status Before Your Departure
Sensitivity: Private

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Good Morning Sarah,

I hope you're doing well.

First, I wanted to thank you for all your work and assistance on our project. We truly appreciate the time and effort you've invested.

I understand you'll be leaving SHPO soon, and I wanted to check in regarding the status of our project review. Given the importance of our schedule, we were hoping to better understand the transition plan.

Do you anticipate being able to complete your review of the Phase I Cultural Resources Report before your departure, [REDACTED]? If not, could you let us know what you expect the transition process to be and whether a replacement reviewer has been named?

If additional information or clarification from our team would be helpful, we're happy to provide it as quickly as possible.

Thank you again for your support, and we wish you all the best in your next opportunity.

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his
Cultural Resources Director

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Jonathan Libbon

From: Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Sent: Wednesday, July 22, 2026 11:55 AM
To: Jonathan Libbon
Cc: Cole, J Kevin; Quarles, Mark; Aleyda Galan; Carol Mcknight; Frederick, Kathryn (LEO)
Subject: RE: Rouget Road (SR25-23)

Sensitivity: Private

Hi Jonathan,

We don't have any regulatory timelines for PA233 like 106, I try to have folks review within 45 days. We're down two staff in the compliance division right now, and are obligated to prioritize 106- so I can't say for certain when our response will be coming, but I have assigned Kate Frederick to the project.



Scott Slagor (he/him)
Cultural Resource Protection Manager
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Direct: 517.285.5120
michigan.gov/shpo

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[Save Our Lights | MiPlace](#)

From: Jonathan Libbon <JLibbon@swca.com>
Sent: Tuesday, July 21, 2026 1:39 PM
To: Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Cc: Cole, J Kevin <jkevin.cole@rwe.com>; Quarles, Mark <mark.quarles@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: Rouget Road (SR25-23)
Sensitivity: Private

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Good Afternoon Scott,

(I apologize for what seems like duplicate emails, but we are working with different project teams on the Silver Maple and Rouget Road Projects)

For the Rouget Road Project, we were wondering if a reviewer had been assigned to the project and if your office anticipates completing their review of the report along the original timeline (i.e., 30-days)?

Thanks,

Jon

Jonathan R. Libbon, RPA | he, him, his
Cultural Resources Director

SWCA Environmental Consultants
80 Emerson Lane, Suite 1306
Bridgeville, Pennsylvania 15017
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GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.
PRESIDENT

August 12, 2026

KEVIN COLE
ROUGET ROAD LLC
10250 PENLAWN DR.
JEROME, MI 49249

RE: SR25-23 PA233 Review Rouget Road, LLC Solar, T07S/R04E/Sec. 7, 8, 9, 15, 16, 17, 20, 21,
22, 27, 28, 29, 30, 33, and 34, Palmyra Township, Lenawee County (MPSC)

Dear Mr. Cole:

We have reviewed the following report conducted by SWCA Environmental Consultants, *Phase I Archaeological Survey for the Rouget Road Solar Project, Lenawee County, Michigan*, submitted to satisfy the cultural resource identification requirement of Michigan Public Act 233. The phase I survey identified 13 archeological sites, and recommended all 13 sites as not eligible for the NRHP. [REDACTED]

[REDACTED]
[REDACTED]
Additionally, we agree with the assessment of the phase I archaeological survey that no additional archaeology needs to be conducted.

Before we can issue a determination on the cultural resource impacts we require a reconnaissance survey of above-ground resources within a half (0.5)-mile radius from the project area. The survey must meet the requirements of the *Michigan Above-ground Survey Manual*. Questions concerning architectural survey should be directed to Katie Kolokithias, KolokithasK1@michigan.gov.

Additional information must be submitted online through our [Additional Information Portal](#).

Please note that our review cannot proceed until we are able to consider the information requested above. Direct questions concerning archaeological survey and impacts to archaeological resources to Dr. Kate Frederick via email at frederickk1@michigan.gov. **Please reference our project number in all communication with this office regarding this review.** Thank you for your consultation.

Sincerely,

Kathryn Frederick
SHPO Archaeologist

SES:KMF

Copy: Anna Gilmer, SWCA
Lakota Hobia, Match-e-be-nash-she-wish Band of Pottawatomi



Jonathan Libbon

From: Frederick, Kathryn (LEO) <FrederickK1@michigan.gov>
Sent: Wednesday, August 12, 2026 10:41 AM
To: Cole, J Kevin
Cc: Jonathan Libbon; Lakota Pochedley
Subject: PA233 SR25-23; Review Rouget Road, LLC Solar
Attachments: SR25-23 Phase I Survey.pdf

Hello,

Please find the attached response to the consultation request noted above.

Please let me know if you have any questions.



Kate Frederick, Ph.D. (she/her)
Staff Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Phone: 517-855-0082
michigan.gov/shpo

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Jonathan Libbon

From: Frederick, Kathryn (LEO) <FrederickK1@michigan.gov>
Sent: Thursday, August 13, 2026 10:44 AM
To: Jonathan Libbon; Cole, J Kevin
Cc: Lakota Pochedley; Quarles, Mark; Aleyda Galan; Carol Mcknight
Subject: Re: PA233 SR25-23; Review Rouget Road, LLC Solar

Hi Jonathan,

[REDACTED]

Best,
Kate



Kate Frederick, Ph.D. (she/her)
Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Phone: 517-855-0082
michigan.gov/shpo



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From: Jonathan Libbon <JLibbon@swca.com>
Sent: Thursday, August 13, 2026 10:38 AM
To: Frederick, Kathryn (LEO) <FrederickK1@michigan.gov>; Cole, J Kevin <jkevin.cole@rwe.com>
Cc: Lakota Pochedley <Lakota.Pochedley@glt-nsn.gov>; Quarles, Mark <mark.quarles@rwe.com>; Aleyda Galan <aleyda.galan@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>
Subject: RE: PA233 SR25-23; Review Rouget Road, LLC Solar

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Good Morning Kate,

I appreciate your review and response letter. I know you have a lot on your plate with the agency being short staffed.



As far as the overall project goes, we submitted the Historic Architecture Reconnaissance survey to your office this morning.

Thanks,

Jon

Jonathan Libbon
724.316.5547

From: Frederick, Kathryn (LEO) <FrederickK1@michigan.gov>
Sent: Wednesday, August 12, 2026 10:41 AM
To: Cole, J Kevin <jkevin.cole@rwe.com>
Cc: Jonathan Libbon <JLibbon@swca.com>; Lakota Pochedley <Lakota.Pochedley@glt-nsn.gov>
Subject: PA233 SR25-23; Review Rouget Road, LLC Solar

Hello,
Please find the attached response to the consultation request noted above.

Please let me know if you have any questions.



Kate Frederick, Ph.D. (she/her)
Staff Archaeologist
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Phone: 517-855-0082
michigan.gov/shpo

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Jonathan Libbon

From: Megan Daniels
Sent: Thursday, August 13, 2026 10:12 AM
To: Slagor, Scott (LEO); KolokithasK1; Nelson, Cassandra (LEO)
Cc: Jonathan Libbon; Carol Mcknight; Aleyda Galan; Quarles, Mark; Cole, J Kevin
Subject: Re: SR25-23 Rouget Road Solar Farm Above-ground Resources Report

Excellent! Thank you, Scott, for confirming.

Megan Daniels
Lead Architectural Historian
SWCA Environmental Consultants

From: Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Sent: Thursday, August 13, 2026 9:11 AM
To: Megan Daniels <Megan.Daniels@swca.com>; KolokithasK1 <KolokithasK1@michigan.gov>; Nelson, Cassandra (LEO) <NelsonC32@michigan.gov>
Cc: Jonathan Libbon <JLibbon@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>
Subject: RE: SR25-23 Rouget Road Solar Farm Above-ground Resources Report

Thank you Megan, I was able to download the report/attachments and get them loaded into the database.



Scott Slagor (he/him)
Cultural Resource Protection Manager
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Direct: 517.285.5120
michigan.gov/shpo

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From: Megan Daniels <Megan.Daniels@swca.com>
Sent: Thursday, August 13, 2026 9:47 AM
To: Kolokithas, Kathrine (LEO) <KolokithasK1@michigan.gov>; Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Cc: Jonathan Libbon <JLibbon@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan

<aleyda.galan@swca.com>; Quarles, Mark <mark.quarles@rwe.com>; Cole, J Kevin <jkevin.cole@rwe.com>

Subject: Re: SR25-23 Rouget Road Solar Farm Above-ground Resources Report

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Thank you, Scott and Katie, for your input.

On behalf of Rouget Road Solar Farm, LLC, SWCA is submitting the above-ground reconnaissance survey report for the (SR25-23) PA233 Review of the Rouget Road Solar Farm project in Palmyra Township, Lenawee County. The report and appendices are available via the link below. Please let me know if there are any issues accessing the One Drive folder or downloading the files.

 [26-0812 SR25-23 Report Submittal to SHPO](#)

Best Regards,

Megan Daniels | she, her, hers

Lead Architectural Historian

SWCA Environmental Consultants

200 W 22nd Street

Suite 220

Lombard, IL, 60148

P: +1.630.705.1762 Ext: 111630 | C: +1.414.559.6936

megan.daniels@swca.com



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From: Kolokithas, Kathrine (LEO) <KolokithasK1@michigan.gov>

Sent: Wednesday, August 12, 2026 1:25 PM

To: Slagor, Scott (LEO) <SlagorS2@michigan.gov>; Megan Daniels <Megan.Daniels@swca.com>

Cc: Jonathan Libbon <JLibbon@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>

Subject: RE: SR25-23 Rouget Road Solar Farm Above-ground Resources Report

Good afternoon,

I have no preference on whether you break it up or submit as one document, whatever is easier for you all.

Thank you,

Katie Kolokithas

Survey Coordinator

State Historic Preservation Office

Office: 517.335.9840 Cell: 517.285.9248

From: Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Sent: Wednesday, August 12, 2026 2:14 PM
To: Megan Daniels <Megan.Daniels@swca.com>; Kolokithas, Kathrine (LEO) <KolokithasK1@michigan.gov>
Cc: Jonathan Libbon <JLibbon@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>
Subject: RE: SR25-23 Rouget Road Solar Farm Above-ground Resources Report

Hi Megan,

Thank you for reaching out. If you could send a cover page or something to the additional information portal so it gets flagged, that would be good. The rest can be shared by your One Drive folder. We've had mixed experiences downloading from external sources, so will let you know if we run into any issues.

I'll defer to Katie on how the document should be broken up.

Looking forward to reviewing the materials. Thanks.



Scott Slagor (he/him)
Cultural Resource Protection Manager
State Historic Preservation Office
300 N. Washington Square
Lansing, MI 48913
Direct: 517.285.5120
michigan.gov/shpo

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From: Megan Daniels <Megan.Daniels@swca.com>
Sent: Wednesday, August 12, 2026 1:36 PM
To: Kolokithas, Kathrine (LEO) <KolokithasK1@michigan.gov>; Slagor, Scott (LEO) <SlagorS2@michigan.gov>
Cc: Jonathan Libbon <JLibbon@swca.com>; Carol Mcknight <Carol.Mcknight@swca.com>; Aleyda Galan <aleyda.galan@swca.com>
Subject: SR25-23 Rouget Road Solar Farm Above-ground Resources Report

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Hello Katie and Scott -

We are ready to submit the architectural history / above-ground resources report for the Rouget Road Solar Farm project (SR25-23). However, the file is quite large and exceeds the 30MB maximum file size to upload via the

additional information portal. May we provide the report with a shared One Drive folder? If so, do you prefer one large combined report or separate PDFs for the report body and each of the appendices? And, if so, should I include anyone else on the email submittal?

Thanks!

Megan Daniels | she, her, hers
Lead Architectural Historian

SWCA Environmental Consultants

200 W 22nd Street

Suite 220

Lombard, IL, 60148

P: +1.630.705.1762 Ext: 111630 | C: +1.414.559.6936

megan.daniels@swca.com



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Federal Aviation Administration (FAA)

August 26, 2025: FAA Screening Tool Result



Pre-Screening Tool

Use this tool to pre-screen your structure to determine if your proposed construction or alteration project requires notice to FAA. Select structure type and enter the point information to run the Pre-Screening Tool.

Structure Type

Fence Pole/Fence Post

☐ On Airport

☐ This structure is a frequency emitter

Latitude Longitude Datum Height Site Elevation ⓘ

✓ 41.8825 -83.9914 NAD83 30 772

Find Coordinates by Address

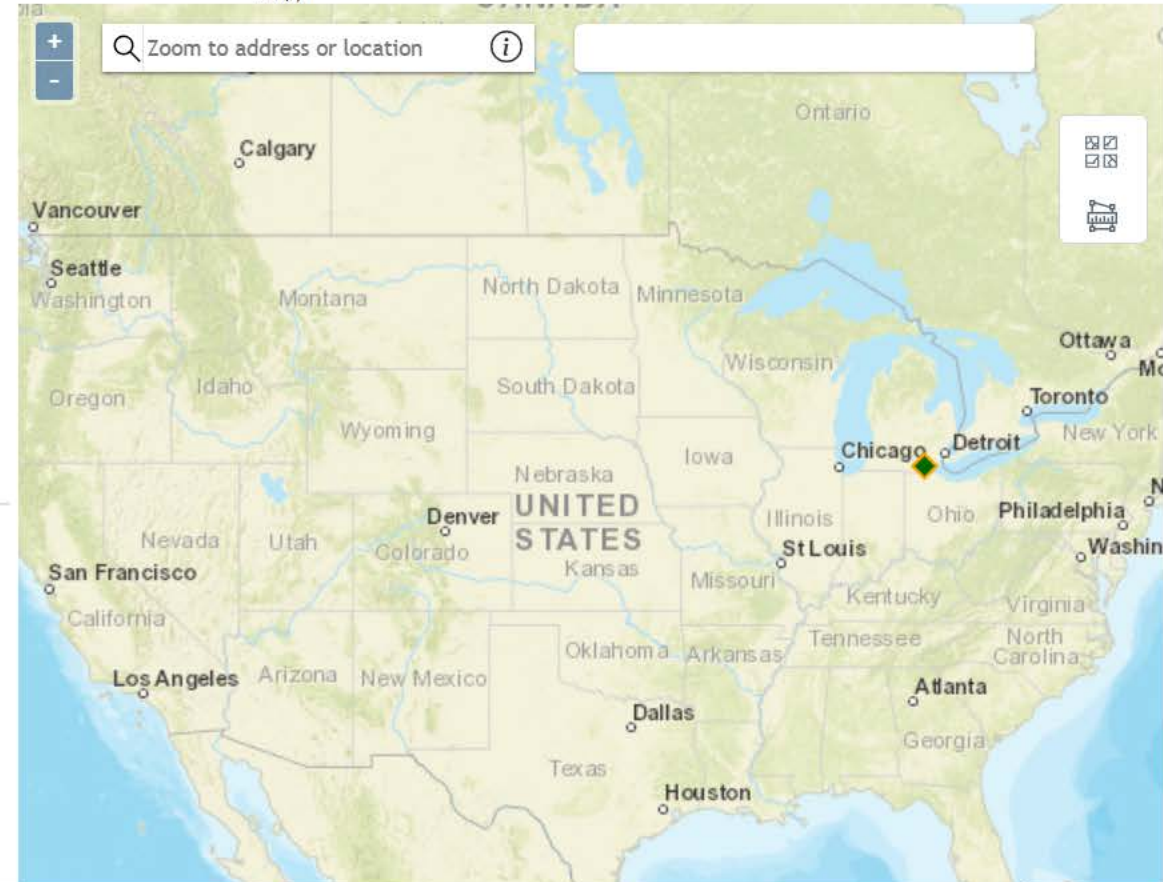
Based on the information you provided, you are not required to file notice with the FAA.

Clear

Submit

Print

☐ Show Obstacles (Known obstacles [of interest to aviation] display once a location point is set on the map)





Pre-Screening Tool

Use this tool to pre-screen your structure to determine if your proposed construction or alteration project requires notice to FAA. Select structure type and enter the point information to run the Pre-Screening Tool.

- Home
- Reports
- Search
- Download
- Pre-Screening Tool
- Tools
- FAQ & Resources

Structure Type Solar Panel

☐ On Airport ☐ This structure is a frequency emitter

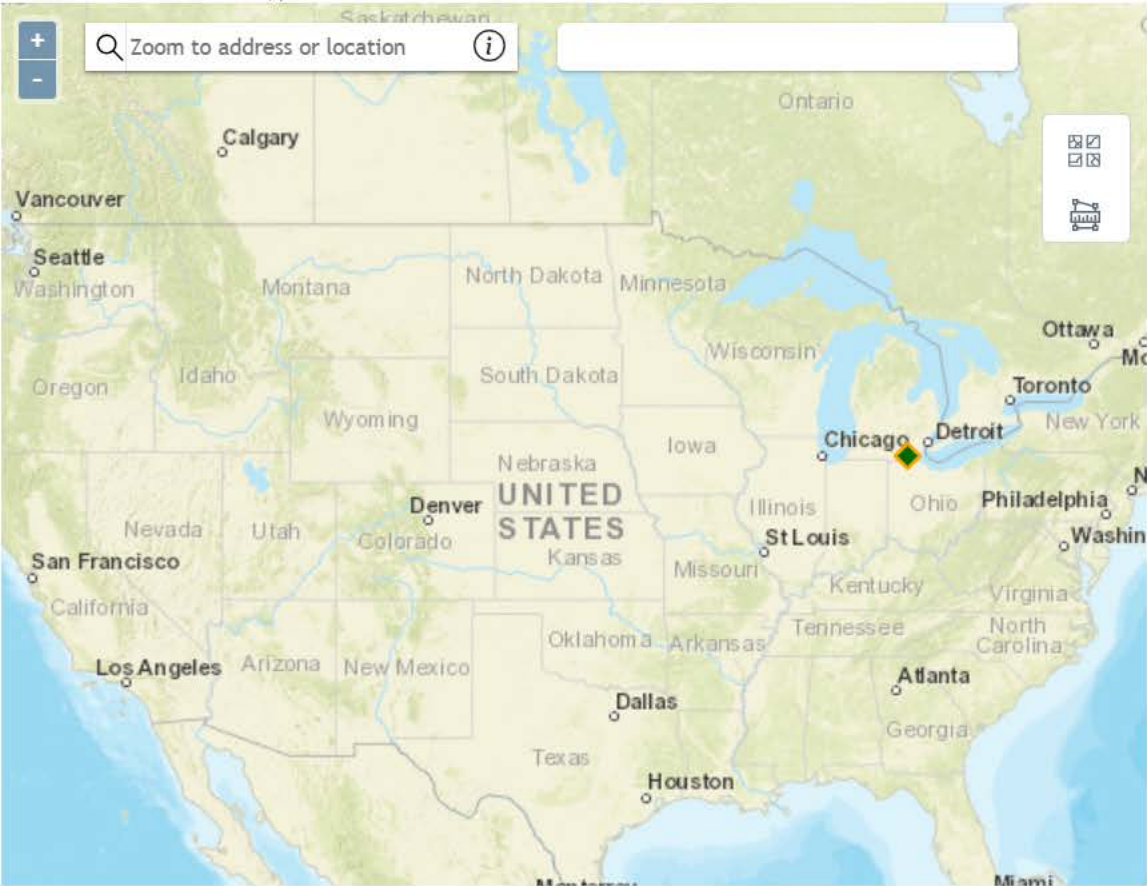
	Latitude	Longitude	Datum	Height	Site Elevation	
✓	41.8824	-83.9912	NAD83	40	772	↗
✓	41.8824	-83.9913	NAD83	40	772	↗
✓	41.8815	-83.9913	NAD83	40	767	↗
✓	41.8815	-83.9912	NAD83	40	767	↗

Find Coordinates by Address

Based on the information you provided, you are not required to file notice with the FAA.

Clear Submit Print

☐ Show Obstacles (Known obstacles [of interest to aviation] display once a location point is set on the map)



**Michigan Department of Agriculture and Rural Development
(MDARD)**

April 9, 2025: Consultation Log

June 10, 2025: Email Correspondence

July 2, 2025: Email Correspondence

July 3, 2025: Email Correspondence

July 7, 2025: Email Correspondence

July 10, 2025: Email Correspondence and Attachment

Agency Consultation Log

Date: April 9, 2025

Time: 11:00AM – 11:15PM EST

Agency: MDARD

Attendees:

Jarrold Thelen – MDARD

Zachary Emery – SWCA

Topics Discussed:

- SWCA asked if there is a specific MPSC process for consultation with MDARD.
 - MPSC will reach out to MDARD after we submit the application for them to review and confirm that we have accounted for protected farmlands in our application.
- MDARD confirmed that each landowner enrolled in PA116 would need to fill out an application to amend their farmland agreements
 - Typically, the developer will guide the process by collecting all the applications from the landowners and submitting them to MDARD along with the solar development plans, following which MDARD will review.
 - If approved at least 90 days prior to construction the developer must submit a decommissioning bond (and a few other things in section 5 of the approval process).
 - Once that is complete MDARD will issue the final amended farmland agreements to the landowners.

Next Steps and Associated Timeline:

- RWE and SWCA will continue coordination with MDARD. RWE will confirm what participating landowners are enrolled in PA116 and move forward from there.

Sent: Thursday, July 3, 2025 10:23 AM
To: Holly M. Zoe <HZoe@dickinson-wright.com>
Cc: Leslee M. Lewis <LLewis@dickinson-wright.com>
Subject: RE: Potential PA 116 Land

Hi Holly,

I have carved out time next week to review this list for PA 116 enrollment. Barring any emergencies, I will provide you with the PA 116 status by the end of next week.

Jarrold Thelen

Farmland and Open Space Preservation (PA 116)
Michigan Department of Agriculture and Rural Development
Cell Phone: 517-243-5366
Main Phone: 517-284-5663
Fax: 517-335-3131

Visit us at Michigan.gov/Farmland

Sign up for the latest news regarding Farmland Preservation at [GovDelivery](https://GovDelivery.com).

From: Holly M. Zoe <HZoe@dickinson-wright.com>
Sent: Wednesday, July 2, 2025 9:28 AM
To: Thelen, Jarrod (MDARD) <ThelenJ17@michigan.gov>
Cc: Leslee M. Lewis <LLewis@dickinson-wright.com>
Subject: RE: Potential PA 116 Land

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Hi Jarrod,
Just following up on this one. Could you let me know whether this land is PA 116 land? Thank you!



[Holly M. Zoe](#)

Member
O:616-336-1064
HZoe@dickinsonwright.com

200 Ottawa Ave. N.W., Suite 900, Grand Rapids, MI 49503

From: Holly M. Zoe
Sent: Tuesday, June 10, 2025 7:21 PM
To: Thelen, Jarrod (MDARD) <ThelenJ17@michigan.gov>
Cc: Leslee M. Lewis <LLewis@dickinson-wright.com>

Subject: Potential PA 116 Land

Hi Jarrod,

I hope you are doing well! I'm reaching out because I have another set of parcels for which I'd like to know PA 116 status. Could you please let me know if any of the real property in the attached PDF is enrolled in PA 116? If you need any other information from me, let me know! I really appreciate your time and assistance on this; I know you're busy.

Holly

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From: Holly M. Zoe <HZoe@dickinson-wright.com>
Sent: Monday, July 7, 2025 9:25 AM
To: Thelen, Jarrod (MDARD) <ThelenJ17@michigan.gov>
Cc: Leslee M. Lewis <LLewis@dickinson-wright.com>
Subject: RE: Potential PA 116 Land

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Thank you Jarrod. Very much appreciate it. I hope you had a nice Independence Day weekend!



[Holly M. Zoe](#)

Member

O:[616-336-1064](tel:616-336-1064)

HZoe@dickinsonwright.com

200 Ottawa Ave. N.W., Suite 900, Grand Rapids, MI 49503

From: Thelen, Jarrod (MDARD) <ThelenJ17@michigan.gov>
Sent: Thursday, July 10, 2025 11:32 AM
To: Holly M. Zoe <HZoe@dickinson-wright.com>
Cc: Leslee M. Lewis <LLewis@dickinson-wright.com>
Subject: RE: Potential PA 116 Land

Holly,

I have added the PA 116 information for each of these parcels in red text.

Let me know if you have any questions.

Jarrod Thelen

Farmland and Open Space Preservation (PA 116)
Michigan Department of Agriculture and Rural Development
Cell Phone: 517-243-5366
Main Phone: 517-284-5663
Fax: 517-335-3131

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All that part of the Southeast 1/4 of Section 7, T7, R4E, Palmyra Township, Lenawee County, Michigan bounded and described as beginning at an iron drag tooth set on the North and South 1/4 line 17 chains, 7 links North from the South 1/4 corner of said Section 7; running thence South on said 1/4 line 2 chains and 7 links; thence East 12 rods; thence South 26 rods; thence East 22 rods; thence North 6 rods; thence East to the East line of said section; thence North on the East line of said Section 7 chains and 50 links to an iron stake; thence South 89° West 34 chains 68 links to an iron stake; thence North at right angles to the last mentioned line 50 links to an iron stake; thence South 89° West 3 chains to an iron stake; thence South at right angles to the last mentioned line 75 links to an iron stake; thence South 89° West 2 chains 50 links to the place of beginning.

ALSO, All that part of the Southeast 1/4 of Section 7, T7, R4E, Palmyra Township, Lenawee County, Michigan, bounded as follows: Commencing at an iron drag tooth set on the North and South 1/4 line 17 chains and 7 links North from the South 1/4 corner of said Section 7; thence North 7 chains and 67 links to an iron drag tooth set at the Southwest corner of land owned by J. G. Nash; thence East on the said J. G. Nash's South line to the East line of said Section 7; thence South on said Section line 7 chains and 50 links to an iron stake; thence South 89° West 34 chains and 68 links to an iron stake; thence North at right angles to the last named line 50 links to an iron stake; thence South 89° West 3 chains to an iron stake; thence South 75 links to an iron stake; thence South 89° West 2 chains and 50 links to the place of beginning.

EXCEPTING THEREFROM All that part of the Southeast 1/4 of Section 7, T7, R4E, Palmyra Township, Lenawee County, Michigan, described as: Beginning on the West line of the Southeast 1/4 of Section 7, aforesaid, 594.00 feet North 00° 18' 47" West from the South 1/4 corner of said Section 7; thence North 00° 18' 47" West 455.50 feet along the said West line of the Southeast 1/4 of Section 7; thence North 89° 57' 33" East 202.49 feet; thence South 00° 18' 47" East 452.00 feet; thence South 88° 58' 08" West 202.50 feet to the place of beginning.

ALSO EXCEPTING THEREFROM All that part of the Southeast 1/4 of Section 7, T7, R4E, Palmyra Township, Lenawee County, Michigan, described as: Beginning on the West line of the Southeast 1/4 of Section 7, aforesaid, 1049.50 feet North 00° 18' 47" West from the South 1/4 corner of said Section 7; thence North 00° 18' 47" West 275.00 feet along the said West line of the Southeast 1/4 of Section 7; thence North 89° 41' 13" East 316.00 feet; thence South 00° 18' 47" East 276.50 feet; thence South 89° 57' 33" West 316.00 feet to the place of beginning.

Parcel No. PA0-107-4550-00 No PA 116

The Southwest 1/4 of the Southwest fractional 1/4 of Section 8, T7, R4E, Palmyra Township, Lenawee County, Michigan.

Parcel No. PA0-108-3550-00 PA 116 #46-6946A-123129

All that part of the Southeast Fractional 1/4 of Section 8, T7S, R 4E , Palmyra Township, Lenawee County, Michigan described as: Commencing at the Southeast corner of said Section, and running thence West along the South line of said Section 1202 feet; thence North at right angles to said South line of said Section 850 feet more or less to the margin of the River Raisin; thence Southeasterly along the margin of the said River Raisin to the East line of said Section; thence South along the East line of said Section 396 feet to the place of beginning.

Parcel No. PA0-108-4800-00 PA 116 #46-5752-123128

All that part of the Southwest fractional 1/4 of Section 9, T7S, R4E, Palmyra Township, Lenawee County, Michigan. lying South of the River Raisin. **Parcel No. PA0-109-3550-00 PA 116 #46-5752-123128**

All that part of the Northeast 1/4 of Section 17, T7S, R4E, Palmyra Township, Lenawee County, Michigan, described as: Commencing at the Northeast corner of Section 17, aforesaid, and running thence South 0° 21' 03" East along the East line of Section 17 1146.72 feet; thence South 89° 25' 37" West 1941.00 feet; thence North 0° 21' 03" West 1137.4 feet to the North line of said Section 17; thence North 89° 08' 57" East along said North line 1941.00 feet to the place of beginning.

Parcel No. PA0-117-2300-00 PA 116 #46-5755-123128

Commencing at the 1/4 post in the center of Section 21, Town 7 South, Range 4 East; thence East 8 chains and 26 links; thence South 10 chains and 25 links; thence East 48 chains and 51 links to the center of the North and South highway; thence Southerly along center of said highway 15 chains and 75 links; thence Westerly about 15 chains and 72 links to land of Truman Rogers; thence North 3 chains and 68 links to the Northeast corner of said Truman Rogers land; thence Westerly along the North line of said Rogers land 40 chains and 24 links to the North and South 1/4 line of said Section 21; thence North along said 1/4 line 22 chains and 31 links to the place of beginning;

EXCEPTING THEREFROM all that part of the Southwest 1/4 of Section 22, Town 7 South, Range 4 East, described as beginning 676.50 feet South 0° 04' 17" West along the West line of Section 22 aforesaid and 964.80 feet South 89° 20' 23" East from the West 1/4 corner of said Section 22; thence South 89° 20' 23" East 150.00 feet; thence South 03° 25' 36" West 150.00 feet along the centerline of Robb Highway; thence North 89° 20' 23" West 150.00 feet; thence North 03° 25' 36" East 150.00 feet to the point of beginning.

Parcel Nos. PA0-121-4050-00 and PA0-122-3155-00 PA 116 #46-51116-123125

All that part of the Southwest 1/4 of Section 8, Town 7 South, Range 4 East, described as beginning on the East-West 1/4 line of Section 8, aforesaid, 652.31 feet North 88°36'41" East from the West 1/4 corner of said Section 8; thence North 88°36'41" East 758.81 feet continuing along the said East-West 1/4 line of Section 8; thence South 03°16'19" East 2.28 feet to a found iron pipe; thence South 89°20'53" East 456.15 feet to the center line of Humphrey Highway; thence along the said center line of Humphrey Highway South 03°20'54" West 67.47 feet and South 00°37'54" East 314.60 feet and South 00°36'38" West 156.89 feet and South 02°00'25" West 639.77 feet and 473.65 feet along a 2320.65 foot radius curve to the right having a chord bearing and distance of South 07°51'14" West 472.83 feet; and South 13°42'02" West 521.61 feet; thence leaving the said center line of Humphrey Highway South 89°58'52" West 341.26 feet along the Northerly line of property described in Warranty Deed [Liber 988, Page 286 \(D\)](#), Lenawee County Records; thence North 00°13'58" West 824.10 feet along the West line of the Southeast 1/4 of the Southwest 1/4 of said Section 8; thence South 89°06'51" West 653.53 feet along the South line of the Northwest 1/4 of the Southwest 1/4 of said Section 8; thence North 00°10'34" West 1328.57 feet along the West line of the East 1/2 of the Northwest 1/4 of the Southwest 1/4 of said Section 8 to the point of beginning. Containing 45.10 acres.

Parcel No. PA0-108-3100-00 No PA 116

The South 1/2 of the West 50 acres of the East 1/2 of the Southeast 1/4 of Section 20, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-120-4800-00 PA 116 #46-18462B-123159**

The East 1/2 of the Southwest 1/4 of the Southeast 1/4 of Section 20, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-120-4600-00 PA 116 #46-18462A-123159**

Land in the Township of Palmyra, County of Lenawee, State of Michigan, described as follows:

The Northeast 1/4 of the Southwest 1/4 of Section 8, Town 7 South, Range 4 East, and the East 1/2 of the Northwest 1/4 of the Southwest 1/4 of said Section 8 and all that part of the Northwest 1/4 of the Southeast 1/4 of said Section 8 lying West of the River Raisin. Subject to a right of passage (if any) along the South line of said land West of the highway as now used:

EXCEPTING THEREFROM all that part of the Northeast 1/4 of the Southwest 1/4 of Section 8, Town 7 South, Range 4 East, further described by Walter E. Frazier & Associates, Inc. Certified Boundary Survey (Job No. 0211608) as: Commencing at the intersection of the East-West 1/4 line of Section 8 with the centerline of Humphrey Highway, said point being located 1869.62 feet North 88° 36' 41" East from the West 1/4 corner of said Section 8, and running thence North 88° 36' 41" East along the East-West 1/4 line of Section 8, 209.50 feet; thence South 01° 23' 19" East 400.00 feet; thence South 88° 36' 41" West 221.50 feet to the centerline of Humphrey Highway; thence North 00° 38' 04" West along said centerline 314.53 feet; thence North 03° 20' 07" East along said centerline 67.50 feet; thence North 05° 48' 51" East along said centerline 18.37 feet to the point of beginning;

ALSO EXCEPTING THEREFROM all that part of the Southwest 1/4 of Section 8, Town 7 South, Range 4 East. described as beginning on the East-West 1/4 line of Section 8, aforesaid, 652.31 feet North 88° 36' 41" East from the West 1/4 corner of said Section 8; thence North 88° 36' 41" East 758.81 feet continuing along the said East-West 1/4 line of Section 8; thence South 03° 16' 19" East 2.28 feet to a found iron pipe; thence South 89° 20' 53" East 456.15 feet to the center line of Humphrey Highway; thence along the said center line of Humphrey Highway South 03° 20' 54" West 67.47 feet and South 00° 37' 54" East 314.60 feet and South 00° 36' 38" West 156.89 feet and South 02° 00' 25" West 639.77 feet and 473.56 feet along a 2320.65 foot radius curve to the right having a chord bearing and distance of South 07° 51' 14" West 472.83 feet: and South 13° 42' 02" West 521.61 feet; thence leaving the said center line of Humphrey Highway South 89° 58' 52" West 341.26 feet along the Northerly line of property described in Warranty Deed in Liber 988, Page 286, Lenawee County Records; thence North 00° 13' 58" West 824.10 feet along the West line of the Southeast 1/4 of the Southwest 1/4 of said Section 8; thence South 89° 06' 51" West 653.53 feet along the South line of the Northwest 1/4 of the Southwest 1/4 of said Section 8; thence North 00° 10' 34" West 1328.57 feet along the West line of the East 1/2 of the Northwest 1/4 of the Southwest 1/4 of said Section 8 to the point of beginning;

ALSO the South 40 acres of the following described land to-wit: Commencing at the South quarter post in the South line of Section 8, Town 7 South, Range 4 East; thence Northerly on the quarter line of said section 27 rods and 8 links; thence North 86 1/2° East 2 rods to a place of beginning; thence North 86 1/2° East 35 chains and 70 links to the margin of the River Raisin; thence up stream on the margin of said river to the quarter line running East and West through said section; thence Westerly on the last mentioned quarter line to the quarter section line running North and South through said Section 8; thence Southerly on said last mentioned quarter line 80 rods more or less to the Northeast corner of a piece of land on said Section 8 which was heretofore conveyed by L. Morris West to one Jessie Stretch by deed bearing date the 24th day of May 1845 and recorded in the Lenawee County Registers Office in Liber T of Deeds on Folio 114; thence East 2 rods; thence Southerly parallel to the said quarter line running Southerly and Northerly through said Section 8 to the place of beginning.

ALSO beginning at the South quarter post of Section 8, Town 7 South, Range 4 East; thence North on quarter line of said section 27 rods and 8 links; thence North 86 1/2° East parallel with South line of section, 36.20 chains to the River Raisin; thence down the margin of said River to East line of said section; thence Southerly on said East line 24 rods to the Southeast corner of said section; thence West on the South line of said section 39.45 chains to the place of beginning. Also the right of way for purposes of highway over the following described parcel of land beginning at a point on the North and South quarter line of said Section 8 at the Northwest corner of land last above described; thence North on said quarter line to a point 2 rods South of the Northeast corner of land on the Southeast corner of the Southwest 1/4 of said section which was conveyed by L. Norris West to one Jesse Stretch 24 May 1845 by Deed recorded in Liber T at Folio 114; thence West parallel with North line of said land to the center of highway running Northerly and Southerly through the East 1/2 of the Southwest 1/4 of said Section 8; thence North in center of highway 2 rods; thence East on North line of land so as aforesaid conveyed to Jesse Stretch to the Northeast corner thereof; thence East 2 rods; thence Southerly parallel with quarter section line to a point 27 rods 8 links North of the South line of said Section; thence West 2 rods to the place of beginning;

ALSO all that part of the Southeast 1/4 of the Southwest 1/4 of said Section 8, Town 7 South, Range 4 East. lying East of the center of the highway: EXCEPTING THEREFROM a strip of land 2 rods wide from off and across the North end thereof, used for highway purposes;

ALSO all that part of the Southeast 1/4 of the Southwest 1/4 of Section 8, Town 7 South, Range 4 East, lying West of the North and South road; EXCEPTING THEREFROM 3 acres from off the South end thereof;

ALSO EXCEPTING THEREFROM all that part of the Southeast fractional 1/4 of Section 8, Town 7 South, Range 4 East. described as commencing at the Southeast corner of said section and running thence West along the South line of said section 1202 feet; thence North at right angles to said South line of section, 850 feet more or less to the margin of the River Raisin; thence Southeasterly along the margin of the said River Raisin to the East line of said section; thence South along the East line of said section 396 feet to the place of beginning.

Commonly known as: 2000 Humphery Highway Block, Palmyra, MI 49268

Parcel No. PA0- 108-3825-00 No PA 116

The South 28 acres of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan.

ALSO

The North 22 acres of the Northwest 1/4 of the Southwest 1/4 of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan.

EXCEPTING AND RESERVING THEREFROM all that part of the Southwest 1/4 of said Section 16, described as: Commencing on the West line of Section 16, aforesaid, at a point located 433.57 feet South from the West 1/4 corner of said Section 16, and running thence North 89° 51' 10" East 1334.16 feet; thence South 0° 18' 40" West 296.55 feet; thence South 89° 51' 10" West 1332.53 feet to the West line of Section 16; thence North along said line, 296.50 feet to the place of beginning.

Parcel No. PA0-116-1550-00 PA 116 #46-18471-123139

All that part of the East 1/2 of the Southeast 1/4 of Section 17, T7S, R4E, Palmyra Township, Lenawee County, Michigan, lying North of Highway U.S. 223.

EXCEPTING AND RESERVING THEREFROM all that part of the Northeast 1/4 of the Southeast 1/4 of said Section 17, described as: Commencing in the East line of said Section at a point located 134.89 feet North of the Southeast corner of the Northeast 1/4 of the Southeast 1/4 of said Section 17; thence North 71° 36' West 34.78 feet for a further place of beginning; thence North along the West line of Myers Highway 130 feet; thence West at right angles to the West line of Myers Highway 177 feet; thence South parallel with the first course 71.17 feet; thence South 71° 36' East 176.54 feet to the place of beginning.

ALSO EXCEPTING AND RESERVING THEREFROM All that part of the Northeast 1/4 of the Southeast 1/4 of Section 17, described as: Commencing in the East line of said Section 17 at a point located 134.89 feet North of the Southeast corner of the said Northeast 1/4 of the Southeast 1/4 of Section 17; thence North 31° 36' West 34.78 feet; thence North along the West line of Myers Highway 130 feet for a further place of beginning; running thence North along the West line of Myers Highway 124 feet; thence West at right angles to the West line of Myers Highway 177 feet; thence South parallel with the first course 124 feet; thence East 177 feet to the place of beginning.

ALSO EXCEPTING AND RESERVING THEREFROM All that part of the East 1/2 of the Southeast 1/4 of said Section 17, described as: Commencing in the center line of Highway U.S. 223 at a point located 86.42 feet South of the Northeast corner of the Southeast 1/4 of the Southeast 1/4 of said Section 17 and running thence North along the East line of said Section 17, 221.32 feet; thence North 71° 36' West parallel with the center line of Highway U.S. 223, 516.3 feet; thence South 3° 33' East 226.41 feet to the center line of Highway U.S. 223; thence South 71° 36' East along the center line of said Highway 501.4 feet to the place of beginning;

ALSO EXCEPTING AND RESERVING THEREFROM all that part of the Northeast 1/4 of the Southeast 1/4 of said Section 17, described as: Commencing in the East line of said Section 17 at a point located 134.89 feet North of the Southeast corner of the Northeast 1/4 of the Southeast 1/4 of said Section 17; thence North 71° 36' West 34.78 feet; thence North along the West line of Myers Highway 254 feet for a further place of beginning; thence North along the West line of Myers Highway 110 feet; thence West at right angles to the West line of Myers Highway 177 feet; thence South parallel with the first course 110 feet; thence East 177 feet to the place of beginning.

ALSO EXCEPTING AND RESERVING THEREFROM all that part of the East 1/2 of the Southeast 1/4 of said Section 17, described as: Beginning at a point on the East line of said Section 17 located 656.23 feet South from the East quarter corner of said Section 17 and running thence South along the East line of said Section 17, 160.00 feet; thence North 89° 58' 40" West along the North line of a parcel of land described in a deed recorded in [Liber 524, Page 521](#), Lenawee County Records, 210.00 feet; thence North 160.00 feet; thence South 89° 58' 40" East 210.00 feet to the place of beginning.

Parcel No. PA0-117-4350-00 PA 116 #46-18471-123139

The North 10 acres of the West 1/2 of the Northwest 1/4 of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-116-1050-00 PA 116 #46-18471-123139**

All that part of the West 30 acres of the Northeast 1/4 and all that part of the Southeast 1/4 of Section 20, T7S, R4E, Palmyra Township, Lenawee County Michigan described as: Commencing at the North 1/4 corner of Section 20, aforesaid, and running thence North 89°24'22" East along the North line of Section 20, 494.65 feet; thence South 1°13'30" East along the East line of the West 30 acres of the Northeast 1/4 of Section 20, 2638.23 feet to the East and West 1/4 line of Section 20; thence North 88°31'53" East along said line 1788.28 feet; thence South 0°43'41" East 589.53 feet; thence North 88°31'53" East 465.09 feet; thence South 0°24'04" East along the East line of Section 20 187.57 feet; thence South 88°31'53" West 464.02 feet; thence South 0°43'41" East 546.88 feet; thence South 88°31'53" West 822.55 feet; thence North 0°43'41" West 4.08 feet; thence South 89°05'53" West 641.67 feet; thence North 0°53'38" West 656.74 feet; thence South 88°48'49" West 322.04 feet; thence North 0°43'41" West 655.18 feet; thence South 88°31'53" West along the East and West 1/4 line of Section 20, 325.37 feet to the North and South 1/4 line of Section 20; thence North 1°13'30" West along said line 2645.79 feet to the place of beginning.

Parcel No. PA0-120-4050-00 PA 116 #46-5757-123161

The East 1/2 of the Northwest fractional 1/4 of Section 16, T 7S, R4E, Palmyra Township, Lenawee County, Michigan

EXCEPT that thereof lying and being North and East of the River Raisin.

ALSO, The West 1 1/2 rods of the Northwest 1/4 of the Southeast 1/4 of Section 16 aforesaid, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-116-1800-00 No PA 116**

Land in the Township of Palmyra, County of Lenawee, State of Michigan, described as follows: Parcel 1: All that part of the East 20 acres of the Northwest 1/4 of Section 21, Town 7 South, Range 4 East, described as beginning on the North line of Section 21, aforesaid, 45.50 feet West from the North 1/4 corner of said Section 21; thence South 00°10'35" West 283.00 feet; thence West 7.70 feet; thence South 00°10'35" West 1786.50 feet; thence East 714.27 feet to the East line of the said West 1/2 of the Northeast 1/4 of Section 21; thence South 00°10'59" West 578.64 feet to the Southeast corner of the said West 1/2 of the West 1/2 of the Northeast 1/4 of Section 21; thence North 89°36'02" West 661.00 feet to the center of Section 21; thence North 89°11'42" West 329.87 feet to the Southwest corner of the said East 20 acres of the Northwest 1/4 of Section 21; thence North 00°10'35" East 2355.90 feet along the West line of the East 20 acres of the Northwest 1/4 of Section 21; thence East 218.35 feet; thence North 00°10'35" East 283.00 feet to the North line of said Section 21; thence East 66.00 feet to the place of beginning. **ALSO**, all that part of the West 1/2 of the Northeast 1/4 of Section 21, Town 7 South, Range 4 East, described as beginning at a point on the North line of Section 21 aforesaid, located 174.50 feet East from the North 1/4 corner of Section 21 aforesaid; and running thence South 0°10'40" West 2069.50 feet; thence East 210.50 feet; thence North 0°10'40" East 2069.50 feet to the North line of said Section 21; thence West 210.50 feet to the place of beginning; **EXCEPT** an easement to lay and maintain one drainage tile, from the County drain, Westerly across the granted land. **ALSO**, all that part of the East 1/2 of the Northwest 1/4 and the West 1/2 of the Northeast 1/4 of Section 21, Town 7 South, Range 4 East, described as beginning at a point located 69.50 feet East from the North 1/4 corner of said Section 21, and running thence South 0°09'30" West 283.00 feet; thence West 122.70 feet; thence South 0°09'30" West 1786.50 feet; thence East 227.00 feet; thence North 0°10'40" East 2069.50 feet to the North line of Section 21 aforesaid; thence West 105.00 feet to the place of beginning; **EXCEPTING THEREFROM** all that part of the Northeast 1/4 of Section 21, Town 7 South, Range 4 East, described as beginning on the North line of Section 21 aforesaid, 69.50 feet; North 90°00'00" East from the North 1/4 corner of said Section 21; thence continuing North 90°00'00" East 315.50 feet along the North line of said Section 21; thence South 00°10'40" West 283.00 feet; thence South 90°00'00" West 315.49 feet; thence North 00°10'35" East measured (North 00°09'30" East record) 283.00 feet to the point of beginning. **PA0-121-2550-00 No PA 116**

The East 1/2 of the West 3/4 of the East 1/2 of the Northwest 1/4 of Section 21, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-121-1300-00 No PA 116**

The North 1/2 of the Northwest 1/4 of the Southwest 1/4 of Section 21, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **EXCEPTING**

Commencing at the West 1/4 corner of said Section 21; thence running Southerly along the West line a distance of 426, 0 feet to the point of beginning; thence Easterly along a line deflected 90° a distance of 150 feet to a point; thence Southerly along a line deflected 90° a distance of 245.0 feet to a point on the South property line; thence Westerly along said South property line deflected 90° a distance of 150.0 feet to a point on the West Section line of said Section 21; thence Northerly along the West Section line a distance of 245.0 feet to the point of beginning.

Parcel No. PA0-121-3050-00 PA 116 #46-6946-123157

12 acres off the South end of the East ½ of the Northeast ¼ of Section 20, T7S, R4E; Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-120-2800-00 No PA 116**

The North 68 acres of the East ½ of the Northeast ¼ of Section 20, T7S, R4E; Palmyra Township, Lenawee County, Michigan.

EXCEPT Beginning on the North line of the East ½ of the Northeast ¼ of Section 20 aforesaid, 363.75 feet South 88°46' West from the Northeast corner of said Section 20; thence South 88°46' West 264.00 feet; thence South 1°14' East 330.00 feet; thence North 88°46' East 264.00 feet; thence North 1°14' West 330.00 feet to the point of beginning.

Parcel No. PA0-120-2300-00 PA 116 #46-6946-123157

The Southeast 1/4 of the Southwest 1/4 of Section 16, T7S, R4E; Palmyra Township, Lenawee County, Michigan

EXCEPTING THEREFROM the right of way of Toledo & Western Railway Co. across the same.

ALSO EXCEPTING THEREFROM that part lying Northerly of a line described as: Commencing at the Southwest corner of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan; thence North 00° 50' 18" East, 377.766 m (1,239.7 feet) along the West line of said Section 16; thence South 70° 46' 23" East, 295.917 m (970.85 feet) to the point of ending; thence South 19° 13' 37" West, 17 m (55.77 feet); thence South 70° 46' 23" East, 347 m (1,138.45 feet); thence North 19° 13' 37" West, 100 m (328.08 feet) to the point of beginning.

ALSO EXCEPT that part which lies Northerly of the existing right of way line of Highway US-223.

Parcel No. PA0-116-3900-00 PA 116 #46-68085-123104

The Southwest 1/4 of the Southwest 1/4 of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan

EXCEPTING AND RESERVING THEREFROM a small tract in the Northwest corner thereof heretofore conveyed by Edward Jacklin and wife to Richard Guire and wife by deed recorded in Liber 89 at Folio 501; and the right of way of the Toledo and Western Railway Company across said land.

ALSO EXCEPTING AND RESERVING THEREFROM, All that part of the Southwest 1/4, Southwest 1/4, Section 16, T7S, R4E, described as: Commencing in the North line of the Southwest 1/4, Southwest 1/4, Section 16, aforesaid at a point located 430 feet East from the Northwest corner of the said Southwest 1/4, Southwest 1/4 of Section 16 and running thence South 8°04' East 179.6 feet; thence South 70°46' East 100.0 feet; thence North 19° 14' East 220.0 feet to the North line of the said Southwest 1/4, Southwest 1/4, Section 16; thence North 89° 08' West along said line 192.1 feet to the place of beginning.

ALSO EXCEPTING AND RESERVING THEREFROM, all that part of the Southwest 1/4 of the Southwest 1/4 of Section 16, T7S, R4E, described as: Beginning on the North line of the Southwest 1/4 of the Southwest ¼ of Section 16, 622.18 feet North 88° 57' 40" East from the Northwest corner of the Southwest ¼ of the Southwest 1/4 of Section 16, aforesaid; thence South 17° 17' 25" West 220.11 feet; thence South 72°40' East 815.50 feet to the East line of the said Southwest 1/4 of the Southwest 1/4 of Section 16; thence North 0°37'05" West 465.99 feet to the Northeast corner of the said Southwest 1/4 of the Southwest 1/4 of Section 16; thence South 88°57'40" West 708.14 feet to the place of beginning.

ALSO EXCEPTING AND RESERVING THEREFROM That part of the ABOVE DESCRIBED PARCEL lying Northerly of a line described as: Beginning at a point on the west line of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan; which is North 00°50'18" East, 317.784m (1,042.60 feet) from the Southwest corner of said Section 16; thence North 70°02'10" East 10.793m (35.41 feet) to the point of beginning of a limited access right of way line (restricting all ingress and egress) and to a point on the existing Easterly right of way line of Myers Highway; thence continuing North 70°02'10" East, 39.719m (130.31 feet) to the point of ending of limited access; thence South 70°46'23" East, 47.850m (156.99 feet); thence North 19°13'37" East, 4m (13.12 feet); thence South 70°46'23" East, 350m (1,148.29 feet) to a point of ending.

Parcel No. PA0-116-3700-00 PA 116#46-11799A-123165

The West 30 acres of the East ½ of the Northwest ¼ of Section 21, T7S, R4E, Palmyra Township, Lenawee County, Michigan.

ALSO, The West ½ of the Northwest ¼ of Section 21, T7S, R4E, Palmyra Township, Lenawee County, Michigan.

Parcel No. PA0-121-1050-00 PA 116 #46-6946B-123157

The Northeast 1/4 of the Southwest 1/4 of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **Parcel No. PA0-116-3300-00 PA 116 #46-11798-123165**

The North 1/2 of the Northwest 1/4 of Section 28, in Town 7 South, Range 4 East, EXCEPTING AND RESERVING THEREFROM all that part thereof described as beginning on the North line of Section 28, aforesaid, 380.60 feet South 89 degrees 38' 35" East from the Northwest corner of said Section 28; thence South 89 degrees 38' 35" East 164.00 feet along North line of said Section 28; thence South 00 degrees 21' 25" West 403.00 feet; thence North 89 degrees 38' 35" West 164.00 feet; thence North 00 degrees 21' 25" East 403.00 feet to the place of beginning, containing 1.517 acres.

Parcel No. PA0-128-1050-000 PA 116 #46-23753-123160

THE WEST 35 ACRES OF THE NORTHWEST ¼ OF THE SOUTHWEST ¼ OF SECTION 29 IN TOWN 7 SOUTH, RANGE 4 EAST; EXCEPTING THEREFROM THE WEST 35 ACRES OF THE NORTHWEST ¼ OF THE SOUTHWEST ¼ OF SECTION 29, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS BEGINNING AT THE WEST ¼ POST OF SAID SECTION 29; THENCE SOUTH ALONG THE WEST LINE OF SAID SECTION 29 AT A DISTANCE OF 826.70 FEET; THENCE NORTH 89° 17' EAST 1158.34 FEET; THENCE NORTH 00° 09' EAST 826.70 FEET; THENCE SOUTH 89° 17' WEST 1160.50 FEET TO THE PLACE OF BEGINNING.

Parcel No. PA0-129-3200-00 No PA 116

ALL THAT PART OF THE SOUTHEAST 1/4, SOUTHWEST 1/4, SECTION 29, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS BEGINNING ON THE SOUTH LINE OF SAID SECTION 29, 264.00 FEET SOUTH 87 DEGREES 29' 27" WEST FROM THE SOUTH 1/4 CORNER OF SAID SECTION 29 AND RUNNING THENCE SOUTH 87 DEGREES 29' 27" WEST 1060.78 FEET ALONG THE SOUTH LINE OF SECTION 29, AFORESAID; THENCE NORTH 01 DEGREE 14' 19" WEST 1316.86 FEET ALONG THE WEST LINE OF SAID SOUTHEAST 1/4, SOUTHWEST 1/4, SECTION 29; THENCE NORTH 87 DEGREES 41' 14" EAST 990.27 FEET ALONG THE NORTH LINE OF SAID SOUTHEAST 1/4, SOUTHWEST 1/4, SECTION 29; THENCE SOUTH 01 DEGREE 10' 00" EAST 511.85 FEET; THENCE NORTH 88 DEGREES 50' 00" EAST 336.00 FEET; THENCE SOUTH 01 DEGREE 10' 00" EAST 628.79 FEET ALONG THE NORTH AND SOUTH 1/4 LINE OF SAID SECTION 29; THENCE SOUTH 87 DEGREES 29' 27" WEST 264.00 FEET; THENCE SOUTH 01 DEGREES 10' 00" EAST 165.00 FEET TO THE POINT OF BEGINNING.

Parcel No. PA0-129-3800-00 No PA 116

THE SOUTHWEST 1/4 OF THE SOUTHWEST 1/4 OF SECTION 29, TOWN 7 SOUTH, RANGE 4 EAST; EXCEPTING THEREFROM All that part of the Southwest 1/4 of Section 29, Town 7 South, Range 4 East, described as beginning on the south line of Section 29, aforesaid 400.00 feet S 89° 52' 00" E from the Southwest corner of said Section 29; thence N 00° 08' 00" E 380.00 feet thence S 89° 52' 00" E 138.00 feet; thence S 00° 08' 00" W 74.00 feet; thence S 89° 52' 00" E 62.00 feet; thence S 00° 08' 00" W 80.00 feet; thence S 89° 52' 00" E 69.50 feet; thence S 00° 08' 00" W 226.00 feet to the south line of said Section 29; thence N 89° 52' 00" W 269.50 feet to the place of beginning. Containing 2.0 acres.

ALSO EXCEPTING THEREFROM, a parcel of land described in Quitclaim Deed dated October 23, 2003, recorded October 28, 2003 in [Liber 2252, Page 853 \(D\)](#), Official Public Records, Lenawee County, Michigan, as follows:

All that part of the Southwest 1/4 of Section 29, Town 7 South, Range 4 East, described as beginning 669.50 feet S 89 degrees 52' 00" E along the south line of Section 29 aforesaid and 226.00 feet N 00 degrees 08' E from the Southwest corner of said Section 29; thence N 89 degrees 52' 00" W 69.50 feet; thence N 00 degrees 08' 00" E 80.00 feet; thence N 89 degrees 52' 00" W 62.00 feet; thence N 00 degrees 08' 00" E 74.00 feet; thence S 89 degrees 52' 00" E 131.50 feet; thence S 00 degrees 08' 00" W 154.00 feet to the point of beginning. Containing 0.35 acres.

ALSO EXCEPTING THEREFROM, a parcel of land described in Warranty Deed dated May 22, 2018, recorded May 24, 2018 in Liber 2563, Page 869 (D), Official Public Records, Lenawee County, Michigan, as follows:

All that part of the Southwest 1/4 of Section 29, Town 7 South, Range 4 East, described as beginning on the south line of Section 29 aforesaid, 371.34 feet South 89° 52' 00" East from the Southwest corner of said Section 29; thence North 00° 08' 00" East 533.17 feet; thence South 89° 52' 00" East 355.48 feet; thence South 00° 08' 00" West 533.17 feet; thence North 89° 52' 00" West 57.32 feet along said south line of Section 29; thence North 00° 08' 00" East 380.00 feet; thence North 89° 52' 00" West 269.50 feet; thence South 00° 08' 00" West 380.00 feet; thence North 89° 52' 00" West 28.66 feet along said south line of Section 29 to the point of beginning.

Excepting and reserving therefrom an easement for ingress and egress in order to maintain and make any repairs to the drainage ditch on said property.

Parcel No. PA0-129-3550-00 No PA 116

ALSO, ALL THAT PART OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 30, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS COMMENCING ON THE EAST LINE OF SECTION 30, AFORESAID, AT A POINT LOCATED 395.15 FEET SOUTH FROM THE EAST 1/4 CORNER OF SAID SECTION 30 AND RUNNING THENCE ALONG THE CENTER LINE OF A DITCH, SOUTH 68 DEGREES 16' WEST 149.34 FEET; THENCE SOUTH 83 DEGREES 01' WEST 161.19 FEET; THENCE SOUTH 68 DEGREES 14' WEST 182.94 FEET; THENCE SOUTH 85 DEGREES 36' WEST 249.56 FEET; AND CONTINUING ALONG THE CENTER LINE OF THE DRAIN SOUTH, 77 DEGREES 49' WEST 620.58 FEET TO THE WEST LINE OF THE SAID NORTHEAST 1/4, SOUTHEAST 1/4 SECTION 30; THENCE SOUTH 0 DEGREES 07' WEST ALONG SAID LINE 654.3 FEET, MORE OR LESS, TO THE SOUTH LINE OF THE SAID NORTHEAST 1/4, SOUTHEAST 1/4 SECTION 30; THENCE NORTH 89 DEGREES 18' EAST ALONG SAID LINE 604.88 FEET; THENCE NORTH 0 DEGREES 13' EAST 772.50 FEET; THENCE NORTH 89 DEGREES 03' EAST 56.17 FEET; THENCE SOUTH 0 DEGREES 13' WEST 115.5 FEET TO THE SOUTH LINE OF THE NORTHEAST 1/4, NORTHEAST 1/4, SOUTHEAST 1/4 SECTION 30, TOWN 7 SOUTH, RANGE 4 EAST; THENCE NORTH 89 DEGREES 03' EAST ALONG SAID LINE 662.4 FEET TO THE EAST LINE OF SECTION 30; THENCE NORTH ALONG THE EAST LINE OF SAID SECTION 30, 271.07 FEET TO THE PLACE OF BEGINNING.

Parcel No. PA0-130-4400-00 No PA 116

The Southwest 1/4 of The Southeast 1/4 of Section 30, Town 7 South, Range 4

East. **Parcel No. PA0-130-4550-00 No PA 116**

THE SOUTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 30 IN TOWN 7 SOUTH, RANGE 4 EAST, **ALSO**, THE SOUTHEAST 1/4 OF THE NORTHEAST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 30, TOWN 7 SOUTH, RANGE 4 EAST; **ALSO**, COMMENCING AT THE NORTHWEST CORNER OF THE ABOVE DESCRIBED TRACT OF TEN ACRES, AND RUNNING THENCE NORTH ALONG THE WEST LINE OF LAND CONVEYED BY JOHN W. HILL TO GEORGE LINDSEY, 7 RODS; THENCE WEST 3 RODS AND 6 2/3 FEET; THENCE SOUTH 47 RODS, MORE OR LESS TO SOUTH LINE OF SAID NORTHEAST 1/4 OF SOUTHEAST 1/4 OF SAID SECTION; THENCE EAST ON SAID SOUTH LINE 3 RODS, 6 2/3 FEET TO THE SOUTHWEST CORNER OF THE ABOVE DESCRIBED TEN ACRE TRACT; THENCE NORTH ON WEST LINE OF SAID TRACT 40 RODS TO THE PLACE OF BEGINNING.

Parcel No. PA0-130-4800-00 No PA 116

ALL THAT PART OF THE NORTHWEST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS COMMENCING AT THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST; THENCE SOUTH 20 CHAINS TO THE SOUTHWEST CORNER OF SAID NORTHEAST 1/4 OF THE NORTHWEST 1/4; THENCE EAST PARALLEL WITH THE SECTION LINE 7 CHAINS AND 94 LINKS; THENCE NORTH PARALLEL WITH THE SECTION LINE 20 CHAINS TO THE NORTH LINE OF SAID SECTION; THENCE WEST ALONG SAID SECTION LINE 7 CHAINS AND 94 LINKS TO THE PLACE OF BEGINNING.

ALSO, COMMENCING 7 CHAINS AND 94 LINKS EAST OF THE NORTHWEST CORNER OF THE NORTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, AT A STAKE ON THE NORTH LINE OF SAID QUARTER SECTION; THENCE SOUTH PARALLEL WITH THE LINE OF LOTS A DISTANCE OF 20 CHAINS TO A STAKE ON THE SOUTH LINE OF SAID SUBDIVISION OF SAID QUARTER SECTION; THENCE EAST ON SAID LINE 5 CHAINS AND 94 LINKS TO A STAKE; THENCE NORTH PARALLEL WITH LINE OF LOTS 20 CHAINS TO THE NORTH LINE OF SAID QUARTER AND STAKE; THENCE WEST ON SAID LINE A DISTANCE OF 5 CHAINS AND 94 LINKS TO THE PLACE OF BEGINNING.

ALSO, THE EAST 1/2 OF THE WEST 1/4 OF THE NORTHWEST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST.

ALSO, THE SOUTHEAST 1/4 OF THE NORTHWEST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST;

EXCEPTING THEREFROM ALL THAT PART OF THE FOLLOWING DESCRIBED PARCEL CONTAINED WITHIN THE NORTHWEST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS ALL THAT PART OF THE NORTH 1/2 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS BEGINNING ON THE EAST AND WEST 1/4 LINE OF SECTION 33, AFORESAID 2579.10 FEET NORTH 89 DEGREES 49' 30" WEST FROM THE EAST 1/4 CORNER OF SAID SECTION 33; THENCE NORTH 89 DEGREES 49' 30" WEST 141.00 FEET ALONG THE SAID EAST AND WEST 1/4 LINE OF SECTION 33; THENCE NORTH 00 DEGREES 10' 30" EAST 149.00 FEET; THENCE SOUTH 89 DEGREES 49' 30" EAST 141.00 FEET; THENCE SOUTH 00 DEGREES 10' 30" WEST 149.00 FEET TO THE PLACE OF BEGINNING.

ALSO EXCEPTING THEREFROM a parcel of land described in Warranty Deed dated August 30, 1999, recorded October 4, 1999 in [Liber 1670, Page 871 \(D\)](#), Official Public Records, Lenawee County, Michigan, as follows:

ALL THAT PART OF THE NORTH 1/2 SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS BEGINNING ON THE EAST AND WEST 1/4 LINE OF SECTION 33 AFORESAID 2720.10 FEET NORTH 89 DEGREES 49' 30" WEST FROM THE EAST 1/4 CORNER OF SAID SECTION 33; THENCE NORTH 89 DEGREES 49' 30" WEST 335.00 FEET ALONG THE SAID EAST AND WEST 1/4 LINE OF SECTION 33; THENCE NORTH 00

DEGREES 10' 30" EAST 208.00 FEET; THENCE SOUTH 89 DEGREES 49' 30" EAST 335.00 FEET; THENCE SOUTH 00 DEGREES 10' 30" WEST 208.00 FEET TO THE PLACE OF BEGINNING CONTAINING 1.60 ACRES.

Parcel No. PA0-133-1800-00 No PA 116

THE WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 33 IN TOWN 7 SOUTH, RANGE 4 EAST, CONTAINING 80 ACRES OF LAND MORE OR LESS;

EXCEPTING THEREFROM A RIGHT OF WAY HERETOFORE GIVEN THE CANADA SOUTHERN RAILWAY COMPANY;

ALSO, EXCEPTING THEREFROM ALL THAT PART OF THE FOLLOWING DESCRIBED PARCEL CONTAINED WITHIN THE SAID WEST 1/2 OF THE NORTHEAST 1/4: ALL THAT PART OF THE NORTH 1/2 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS BEGINNING ON THE EAST AND WEST 1/4 LINE OF SECTION 33, AFORESAID, 2579.10 FEET NORTH 89 DEGREES 49' 30" WEST FROM THE EAST 1/4 CORNER OF SAID SECTION 33; THENCE NORTH 89 DEGREES 49' 30" WEST 141.00 FEET ALONG THE SAID EAST AND WEST 1/4 LINE OF SECTION 33; THENCE NORTH 00 DEGREES 10' 30" EAST 149.00 FEET; THENCE SOUTH 89 DEGREES 49' 30" EAST 141.00 FEET; THENCE SOUTH 00 DEGREES 10' 30" WEST 149.00 FEET TO THE PLACE OF BEGINNING;

ALSO, EXCEPTING THEREFROM ALL THAT PART OF THE WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, DESCRIBED AS BEGINNING ON THE EAST AND WEST 1/4 LINE OF SECTION 33, AFORESAID, 1841.14 FEET NORTH 89 DEGREES 49' 30" WEST FROM THE EAST 1/4 CORNER OF SAID SECTION 33; THENCE NORTH 89 DEGREES 49' 30" WEST 262.00 FEET ALONG THE SAID EAST AND WEST 1/4 LINE OF SECTION 33; THENCE NORTH 00 DEGREES 10' 30" EAST 166.26 FEET; THENCE SOUTH 89 DEGREES 49' 30" EAST 262.00 FEET; THENCE SOUTH 00 DEGREES 10' 30" WEST 166.26 FEET TO THE PLACE OF BEGINNING;

ALSO, ALL THAT PART OF THE FOLLOWING DESCRIBED PARCEL CONTAINED WITHIN THE WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST.

ALL THAT STRIP OR PARCEL OF LAND, 100 FEET WIDE, SITUATE IN THE TOWNSHIP OF PALMYRA, BEING PART OF THE NORTHWEST 1/4 AND THE WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 33, TOWN 7 SOUTH, RANGE 4 EAST, BOUNDED AND DESCRIBED ACCORDING TO A PLAN OF SURVEY MADE BY GLENN E. RICHARD, REGISTERED LAND SURVEYOR NO. 13040, DATED APRIL 4, 1984 AS FOLLOWS; VIZ: BEGINNING AT A POINT ON THE EAST AND WEST QUARTER LINE OF SECTION 33, AFORESAID, 1158.10 FEET SOUTH 88 DEGREES 39' 35" EAST FROM THE WEST QUARTER CORNER OF SAID SECTION 33; THENCE NORTH 64 DEGREES 25' 01" EAST, 3137.75 FEET; THENCE SOUTH 01 DEGREE 05' 36" WEST, 111.92 FEET ALONG THE EAST LINE OF THE SAID WEST 1/2 OF THE NORTHEAST 1/4 OF SECTION 33; THENCE SOUTH 64 DEGREES 25' 01" WEST, 2890.58 FEET TO THE SAID EAST AND WEST QUARTER LINE OF SECTION 33; THENCE NORTH 88 DEGREES 39' 35" WEST, 220.87 FEET TO THE POINT OF BEGINNING.

Parcel No. PA0-133-2050-00 No PA 116

The West 1/2 of the Northwest 1/4 of Section 16, T7S, R4E, Palmyra Township, Lenawee County, Michigan. **EXCEPTING** therefrom the North 10 acres thereof, and the South 28 acres thereof.

Parcel No. PA0-116-1100-00 No PA 116

All that part of the Southeast 1/4 Section 17, T7S, R4E, Palmyra Township, Eaton County, Michigan described as follows: Commencing at the Southeast corner post of Section 17, aforesaid, and running thence North 1°03'30" West along the East line of said Section 17, 1239.12 feet, to the center line of Highway US-223; thence North 72°40' West along the center line of said Highway 522.07 feet, to the center line of a ditch; thence South 25°44" West along the center line of said ditch 67.0 feet and continuing along the center line of said ditch, South 37°04' West 388.24 feet; thence South 53°56" West 256.45 feet; thence South 34°18' West 327.80 feet; thence South 9°21' West 197.13 feet; thence South 7°32' West 216.06 feet; thence South 4°18' West continuing

along said ditch center line 221.42 feet to the South line of Section 17; thence North 88°46' East along the South line of said Section 17, 1253.64 feet to the place of beginning.

EXCEPT:

That part of TRACT "A" lying Northerly of a line described as: Beginning at a point on the East line of Section 17, T7S, R4E, Palmyra Township, Lenawee County, Michigan, which is North 00°50'18" East 1047.70 feet from the Southeast corner of said Section 17; thence North 43°57'36" West 46.31 feet to a point on the existing Westerly right of way line of Myers Highway also to the point of beginning of a limited access right of way line; thence continuing North 43°57'36" West 74.46 feet along said limited access right of way line to the point of ending of limited access; thence North 70°46'23" West 35.58 feet; thence South 19°13'37" West 16.40 feet; thence North 70°46'23" West 1,049.87 feet; thence North 19°13'37" East 52.49 feet; thence North 70°46'23" West, 984.25 feet to a point of ending.

TRACT "A"

All that part of the Southeast 1/4, Section 17, T7S, R4E, Township of Palmyra, County of Lenawee, State of Michigan, described as: Commencing at the Southeast corner post of Section 17, aforesaid and running thence North 01°03'30" West along the East line of Section 17, 1239.12 feet, to the centerline of Highway US 223; thence North 72°40' West along the centerline of said Highway 522.07 feet, to the centerline of a ditch; thence South 25°44' West along the centerline of said ditch 87.0 feet and continuing along the centerline of said ditch, South 37°04' West 388.24 feet; thence South 53°56' West 256.45 feet; thence South 34 degrees 18 minutes West 327.80 feet; thence South 09°21' West 197.13 feet; thence South 07°32' West 216.06 feet; thence South 04°18' West continuing along said ditch centerline 221.42 feet to the South line of Section 17; thence North 88°46' East along the South line of said Section 17, 1253.64 feet to the place of beginning.

Parcel No. PA0-117-4925-00 No PA 116

The Southeast 1/4 of the Southeast 1/4 of Section 28, Town 7 South, Range 4 East; **EXCEPTING THEREFROM PROPERTY DESCRIBED AS:** All that part of the Southeast 1/4 of Section 28, Town 7 South, Range 4 East, described as beginning on the South line of Section 28, aforesaid, 455.00 feet South 89 degrees 42' 22" West from the Southeast corner of said Section 28; thence South 89 degrees 42' 22" West 147.50 feet along the said South line of Section 28; thence North 00 degrees 17' 38" West 150.00 feet; thence North 89 degrees 42' 22" East 147.50 feet; thence South 00 degrees 17' 38" East 150.00 feet to the point of beginning.

ALSO EXCEPTING: Land and premises in the Township of Palmyra, County of Lenawee, and State of Michigan, described as all that part of the West 400 feet of the South 545 feet of the Southeast 1/4 of the Southeast 1/4 of Section 28, T7S, R4E, which lies Southwest of the center of the existing drainage ditch. **Parcel No. PA0-128-4750-00 PA 116 #46-71168-123139**

Land situated in Palmyra Township, Lenawee County, Michigan, being the South 40 acres of the North 60 acres of the Southeast 1/4 of Section 7, T7N, R4E, Palmyra Township, Lenawee County, Michigan further described by survey as: Commencing at the East 1/4 corner of Section 7; thence South 00°13'17" West 328.14 feet along the East line of Section for a point of beginning; thence continuing along said line South 00°13'17" West 656.75 feet; thence South 88°53'47" West 2652.52 feet along the South line of the North 60 acres of the Southeast 1/4 of Section 7; thence North 656.59 feet along the North-South 1/4 line of Section 7 (centerline of Ogden Highway); thence North 88°53'47" East 2655.06 feet along the South line of the North 20 acres of the Southeast 1/4 of Section 7 to the point of beginning.

AND

Land situated in Palmyra Township, Lenawee County, Michigan, being the North 20 acres of the North 60 acres of the Southeast of Section 7, Town 7 South, Range 4 East, further described by Michael J. Bartolo, Professional Surveyor, as beginning at the Center of Section 7; thence South 328.11 feet along the North-South 1/4 line of Section 7 (centerline of Ogden Highway); thence North 88°53'47" East, 2655.06 feet to the East line of Section 7; thence North 00°13'17" East, 328.14 feet along the East line of Section 7 to the East 1/4 corner of Section 7; thence South 88°53'47" West, 2656.33 feet along the East-West 1/4 line of Section 7 to the point of beginning. Contains 20.000 Acres, more or less.

Parcel No. PA0-107-4025-00 No PA 116

The East 45 acres of the North 1/2 of the Southwest 1/4 of Section 29, Town 7 South, Range 4 East, Township of Palmyra, County of Lenawee, State of Michigan.

LESS AND EXCEPT a parcel of land described in Warranty Deed dated June 9, 2021, recorded June 10, 2021, in [Liber 2620, Page 682 \(D\)](#), Official Public Records, Lenawee County, Michigan, as follows:

All that part of the Southwest 1/4 of Section 29, Town 7 South, Range 4 East, described as beginning on the North-South 1/4 line of Section 29 aforesaid, 1608.15 feet North 01°10'00" West from the South 1/4 corner of said Section 29; thence South 88°50'00" West 103.00 feet; thence North 75°25'11" West 526.80 feet; thence North 01°10'00" West 443.16 feet; thence North 88°50'00" East 105.00 feet; thence South 46°19'17" East 263.94 feet; thence North 88°50'00" East 317.89 feet to said North-South 1/4 line of Section 29; thence South 01° 10'00" East 400.00 feet along said North-South 1/4 line to the point of beginning.

Parcel No. PA0-129-3305-00 No PA 116

The North Half of the Southeast Quarter of Section 29, Town 7, South, Range 4 East. **Parcel No. PA0- 129-4050-00 PA 116 #46-25611-123148**

The Southwest 1/4 of the Northwest 1/4 of Section 28, Town 7 South, Range 4 East.

SAVE AND EXCEPT that tract or parcel of land in Deed dated July 26, 2023, recorded August 2, 2023 in [Liber 2657, Page 841 \(D\)](#), Official Public Records, Lenawee County, Michigan, and being more particularly described as follows:

Land situated in Palmyra Township, Lenawee County, Michigan, being a part of the Northwest 1/4 of Section 28, Town 7 South, Range 4 East, further described by Michael J. Bartolo, Professional Surveyor, as commencing at the West 1/4 Corner of Section 28; thence North 88°52'52" East, 821.82 feet along the East-West 1/4 line of Section 28 (centerline of Cook Road) for a point of beginning; thence continuing North 88°52'52" East, 400.00 feet along said line and said road; thence North 01°07'06" West, 348.11 feet; thence South 88°52'52" West, 400.00 feet; thence South 01°07'06" East, 348.11 feet to the point of beginning. Parent parcel retains an easement that runs with the land for use of the culvert and driveway on the west property line for ingress and egress. Contains 3.197 Acres, more or less. Subject to highway, easements, and restrictions of record.

Parcel No. PA0-128-1555-00 PA 116 #46-73178-123113

Southeast 1/4 of the Northwest 1/4 of Section 28, Town 7 South, Range 4 East, EXCEPTING AND RESERVING THEREFROM land further described by Walter E. Frazier and Associates, Inc., Certified Boundary Survey (Job No. 0210603) as commencing at the West 1/4 corner of Section 28; thence North 88° 30' 00" East, 2288.37 feet along the East-West 1/4 line of Section 28 (centerline of Cook Road) for a point of beginning; thence continuing North 88° 30' 00" East, 351.94 feet along the East-West 1/4 line of Section 28 (centerline of Cook Road) to the center of Section 28; thence North 01° 52' 49" West, 247.55 feet along the North-South 1/4 line of Section 28; thence South 88° 30' 00" West, 351.94 feet; thence South 01° 52' 49" East, 247.55 feet to the point of beginning. (Survey 2 acres).

Together with the right of ingress and egress to repair, replace and maintain farm drainage tile across the following described lands: the East 12 acres of the Northeast 1/4 of the Northwest 1/4 of Section 33, Town 7 South, Range 4 East.

Parcel No. PA0-128-1850-00 PA 116 #46-62829-123129

The East 1/2 of the East 1/2 of the Southwest 1/4 of Section 28, Town7 South, Range 4

East. **Parcel No. PA0-128-3350-00 PA 116 #46-62827-123129**

The West 1/2 of the Southeast 1/4 of Section 28, Town 7 South, Range 4 East.

SAVE AND EXCEPT that tract or parcel of land in Deed dated December 21, 2023, recorded December 26, 2023 in [Liber 2663, Page 78 \(D\)](#), Official Public Records, Lenawee County, Michigan, and being more particularly described as follows:

Land situated in Palmyra Township, Lenawee County, Michigan, being a part of the Southeast 1/4 of Section 28, Town 7 South, Range 4 East, further described by Michael J. Bartolo, Professional Surveyor, as commencing at East 1/4 Corner of Section 28; thence South 88°52'26" West, 1322.60 feet along the East-West 1/4 line of Section 28 (centerline of Cook Road) for a point of beginning; thence continuing South 88°52'26" West, 769.14 feet along said line and said road; thence South 12°57'56" East, 419.22 feet; thence South 11°13'47" East, 358.14 feet; thence South 31°54'19" East, 203.50 feet; thence South 08°54'52" West, 67.37 feet; thence South 29°17'14" East, 72.33 feet; thence South 63°31'33" East, 450.34 feet; thence South 52°23'03" East, 128.02 feet to the East line of the West 1/2 of the Southeast 1/4 of Section 28; thence North 01 °20'40" West, 1356.61 feet to the point of beginning.

Contains 17.511 Acres, more or less.

Subject to highway, easements, and restrictions of record.

Commonly known as 5655 Cook Rd

Parcel No. PA0-128-4055-00 PA 116 #46-73214-123113

The East 1/2 of the Southeast 1/4 of Northeast 1/4 of Section 29, Town 7 South, Range 4

East. **Parcel No. PA0-129-2850-00 PA 116 #46-62830-123129**

Land situated in the Township of Palmyra, Township of Riga, Village of Blissfield, County of Lenawee, also the Township of Whiteford, Township of Summerfield, County of Monroe, all in the State of Michigan, more particularly described as:

Parcel 1 situated in the Township of Palmyra, County of Lenawee, State of Michigan:

The West ½ of the following described land to wit: Commencing at the Northeast corner of Section 17, Town 7 South, Range 4 East; thence South on the Section line 17 chains and 36 links; thence West parallel with the North line of said Section 61 chains and 37 links to the center of Ridge Road; thence North Easterly in the center of said road to the North line of said Section; thence East on the North line of said Section about 57 chains to the place of beginning.

Parcel 2 situated in the Township of Palmyra, County of Lenawee, State of Michigan:

The West ½ of the following described land to wit: Commencing in the center of Ridge Road, so-called, which runs angling across the Northwest ¼ of Section 17, Town 7 South, Range 4 East at a point 17 chains and 36 links South in a direct line from the North line of said Section; thence East parallel with the North line of said Section (and along the South line of land now, or lately, owned by Calvin Crane) to a point 31 chains and 60 links West of the East line of said Section; thence South parallel with said East line (and along the West line of a tract of land conveyed by Calvin K. Crane and wife to Joseph Angell April 11 A.D. 1870 by deed of record recorded in Liber 89 of Deeds at Folio 521 of Lenawee County Records), a distance of 13 chains and 29 links; thence West and parallel with the first herein named course to the center of said Ridge Road; thence Northwesterly along the center of said road to the place of beginning.

Parcel Nos. PA0-117-1300-00 and PA0-117-1800-00 No PA 116

Lenawee County Emergency Management

July 23, 2025: Meeting Minutes

December 18, 2025: Email Correspondence and Attachments

Meeting Minutes

Date: July 23, 2025

Time: 11am – 12:30pm

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan, Assistant Chief Brian Wilcox, and Firefighter Jeff Jackson.
- Lenawee County Emergency Management Team:
- Chris Foerg – Emergency Regional Planner.
- Craig Tanis – Emergency Management Coordinator.
- Local Landowners: Several present and engaged with questions.
- RWE Staff: Kevin Cole, Tim Love, and supporting personnel.

Topics Discussed: This was a joint meeting with the Lenawee County Emergency Management and Palmyra Fire Department. The Madison County Fire Department was invited but could not attend. Kevin Cole provided an overview of the project site plan and MPSC permitting requirements as well as the draft Emergency Response Plan and Fire Response Plan. An electronic copy of the plans was sent to the agencies on July 24, 2025 for review.

Following are the minutes based on the meeting transcript:

1. Purpose of Meeting

- Provide a safety and technical overview of the proposed Palmyra solar project.
- Establish communication channels between RWE, the Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Review safety protocols, emergency response planning, and project impacts from construction through decommissioning.

2. Project Overview

- Location: Southeastern Michigan, (Palmyra area).
- Current status: ~10% design phase; equipment not yet finalized.
- Site details:
 - ~2,000 acres leased.
 - ~1,234 acres expected inside the fenced project footprint (subject to reduction for wetlands/habitat).
- Solar panels: 540–610 watts each, mounted on motorized trackers (25 ft. max height, ~30 in. clearance).

- Electrical system: DC → combiner boxes → inverters → transformers. Stepped up to ~34,500 volts AC before substation interconnection. DC side always energized in presence of light.
- Setbacks & fencing:
 - 50 ft. from roadways.
 - 150 ft. from non-participating property lines.
- Each solar block fully fenced for safety and security.

3. Safety & Emergency Response Procedures

3.1 General Safety

- Situational awareness and controlled communication emphasized.
- Incident Action Plans to be developed for fire, medical, and electrical incidents.

3.2 Fire & Electrical Hazards

- Defensive firefighting approach:
- Electrical fires: allow to self-extinguish.
- Brush/grass fires: water permitted >25 ft. from electrical equipment.
- Acceptable extinguishers: Class C, CO₂, or clean agent.
- Primary risks: vegetation ignition or electrical faults in panels/combiner boxes/inverters.
- No battery storage facility included in this project.

3.3 Access & Coordination

- 24/7 system monitoring via RWE dispatch (Austin, TX). Contact info to be provided to local dispatch.
- Road network: 16-ft wide gravel drives with durable base for heavy vehicles.
- Gates: labeled for mapping and quick emergency access.
- O&M Building: To be co-located near the substation. Equipped with extinguishers, AEDs, staffed by ~4 local permanent employees.
- Emergency support: RWE staff will meet responders at gates. ATVs/UTVs available for patient transport within the field.

4. Vegetation & Fire Prevention

- RWE responsible for mowing/brush clearing inside and outside fences.
- Vegetation kept minimum 8 inches below lowest panel height.
- Roads and fences serve as fire breaks.

- A wildfire risk management plan is under development, factoring in local weather/vegetation growth patterns.

5. Decommissioning & Recycling

- Construction: steel piles driven (not concreted) except at substation. All removable.
- Panels:
- May be resold, donated, or recycled.
- RWE partnered with SolarCycle for panel recycling solutions.
- Life expectancy: ~30 years, with option for 10-year extension.

6. Questions & Concerns Raised

- Drainage systems: Damaged tile drains will be flagged, repaired, and covered under warranty.
- Hazmat risk: Solar panels mainly glass/silica; hazards similar to household fires.
- Accessibility: Firefighters will be met at gates; not expected to locate victims alone.
- Fire suppression: Confirmed defensive-only approach for electrical fires.
- Security: Full fencing prevents trespassing.
- Community impact: RWE committed to supporting fairs, schools, fire departments, and 4H programs.

7. Follow-Up Actions

RWE to provide:

- Dispatch contact details, site maps, and labeled gate IDs.
- Annual Tier II hazardous materials reports and updated emergency contact lists.
- Joint training and site orientation to be scheduled prior to commissioning.
- Facility tours: possible during “Golden Row” construction phase and before operations begin.
- Emergency response plan will be collaboratively developed with the Palmyra Fire Department and Lenawee County Emergency Management Team and refreshed annually.

8. Closing

- Meeting built stronger relationships between RWE, Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Emphasis on safety-first operations, defensive firefighting posture, and transparent communication.

- Contact information exchanged; ongoing updates and training commitments reaffirmed.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in November 2025 for review and comment. Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

From: Cole, J Kevin <JKevin.Cole@rwe.com>
Sent: Thursday, December 18, 2025 1:49 PM
To: prohlan@gmail.com
Cc: Carol Mcknight; Aleyda Galan
Subject: Rouget Road Solar Project - MPSC Filing and Finalize ERP & FRP
Attachments: 20251203_Exhibi A-1.9 Report - V - FINAL.pdf; 20251203_RRS_Exh-A-1.10_FRP_FINAL_pdf.pdf

Hi Chief Hohlan,

I hope all is well.

I wanted to inform you that we have submitted our application to the Michigan Public Service Commission for the Rouget Road Solar project.

As part of the filing, we've finalized our Emergency Response Plan and Fire Response Plan—both are attached for your reference.

I'll be reaching out again as the project moves forward to ensure continued coordination. In the meantime, please don't hesitate to contact me at any time if you have questions or would like additional information.

Appreciate your time and support.

Best regards,
Kevin

J. Kevin Cole
Development Manager

RWE Clean Energy
Mobile : 517-745-7546
353 N Clark St, 30th Floor, Chicago, IL 60654
Jkevin.cole@rwe.com

Rouget Road Solar Farm

Exhibit A-1.9: Emergency Response Plan

Lenawee County, Michigan

DECEMBER 2025

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

EMERGENCY RESPONSE PLAN FOR THE ROUGET ROAD SOLAR PROJECT, LENAWEE COUNTY, MICHIGAN

Prepared for

Rouget Road Solar Farm, LLC
353 North Clark Street
Suite 3000
Chicago, Illinois 60654

Prepared by

SWCA Environmental Consultants

200 W 22nd Street, Suite 220
Lombard, Illinois 60148
www.swca.com

SWCA Project No.
78878

December 2025

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Attachments

Attachment 1: July 23, 2025 Meeting Discussion

1 INTRODUCTION

This Emergency Response Plan (“ERP”) provides guidance to construction and field personnel on measures identified by Rouget Road Solar Farm, LLC (“Rouget Road Solar”) to mitigate risks of hazards associated with the proposed Rouget Road Solar Project (“Project”) in Lenawee County, Michigan. This ERP complies with requirements established under the Michigan Public Service Commission (“MPSC”) Public Act 233 (Public Act 233) and integrates standards from the Occupational Safety and Health Administration (“OSHA”), and relevant local fire safety and emergency codes.

1.1 Local Consultation

This plan has been developed in coordination with emergency response providers, which consists of Lenawee County Emergency Management, the Palmyra and Madison Fire Departments, and the Lenawee County Sheriff’s Office, in accordance with OSHA standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. It will be the responsibility of Rouget Road Solar and its Project contractors to comply with the measures identified in this plan. Rouget Road Solar met with the Lenawee County EMS and Palmyra Fire Department on July 23, 2025 to discuss the Rouget Road Solar Farm Project and ERP. Rouget Road Solar commits to reviewing and updating this ERP with local fire departments, first responders, and the County Emergency Manager at least once every three (3) years and after material design/equipment changes, with documented re-consultation. Additional details on coordination with County Emergency Services can be found in Attachment 1.

Updates to the Project’s ERP may occur based on continued coordination between Rouget Road Solar and local agencies.

1.2 Project Description, Location, and Access

The Rouget Road Solar Farm Project is a proposed 175-megawatt (“MW”) alternating current (“AC”) solar photovoltaic power generating facility. The project would be in Lenawee County, Michigan southeast of the city of Adrian. The Project Boundary/Leased Parcels is approximately 2,133 acres of predominantly agricultural land (Figure 1). Once built, the fenced-in portion of the Project would be approximately 1,042 acres. The project would provide renewable energy to the electrical transmission grid. Major components of the project include photovoltaic solar arrays (the main project footprint), an on-site substation, switchyard, an operation and maintenance (“O&M”) area, transmission line, roads, and fences.

The Project area and adjacent properties primarily consist of agricultural or residential land. State Highway 223 runs east to west through the center of the Project area (Figure 2). CR Myers Highway runs north to south through the center of the Project (see Figure 2).

Police, fire, ambulance, and emergency vehicles will access the Project primarily via State Highway 223 (see Figure 2). The Project is expected to provide electric power to the existing electric transmission grid through a new interconnection to the existing transmission lines running east to west in the northern portion of the Project area.

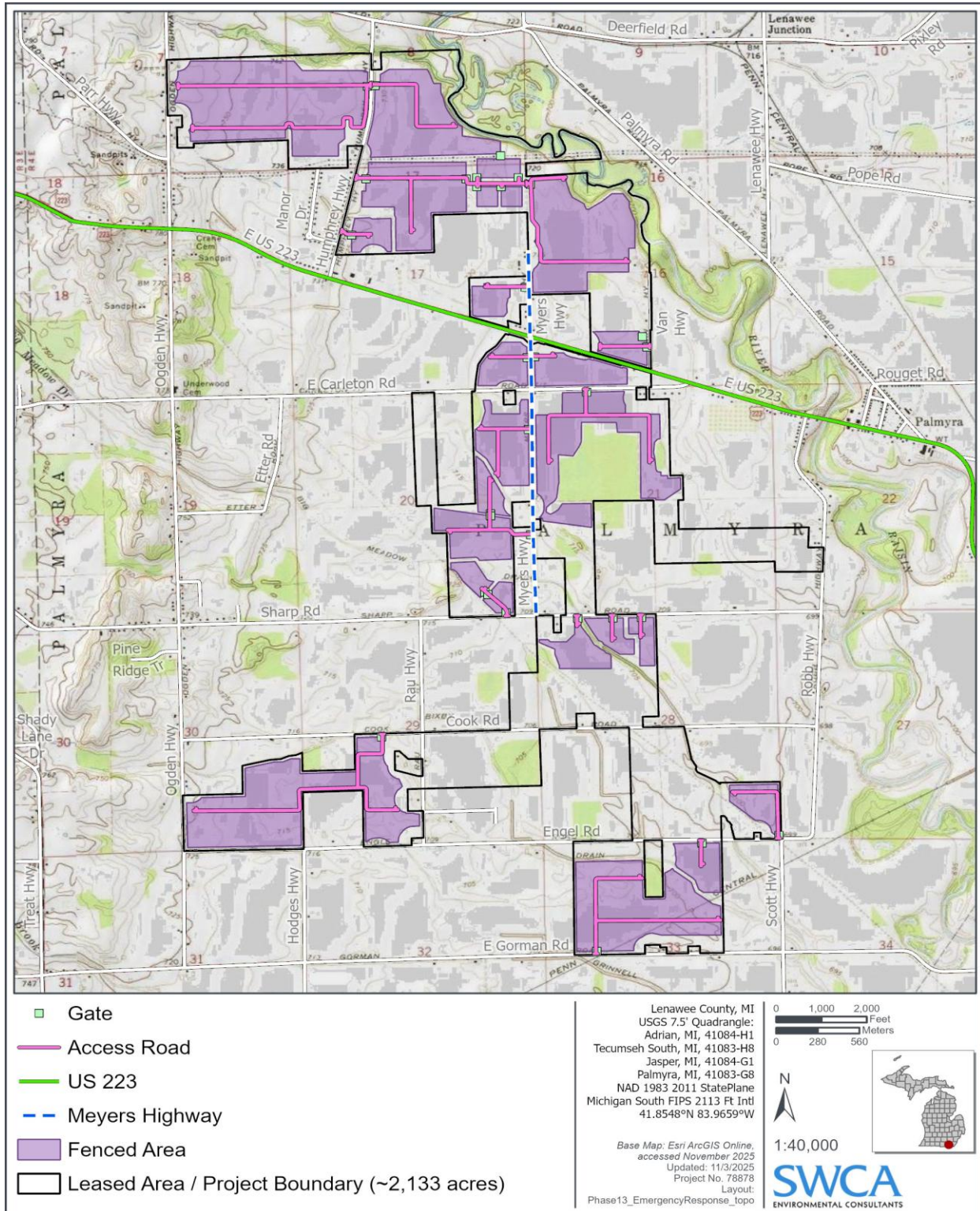


Figure 1. Topography of the Rouget Road Solar Farm Project.

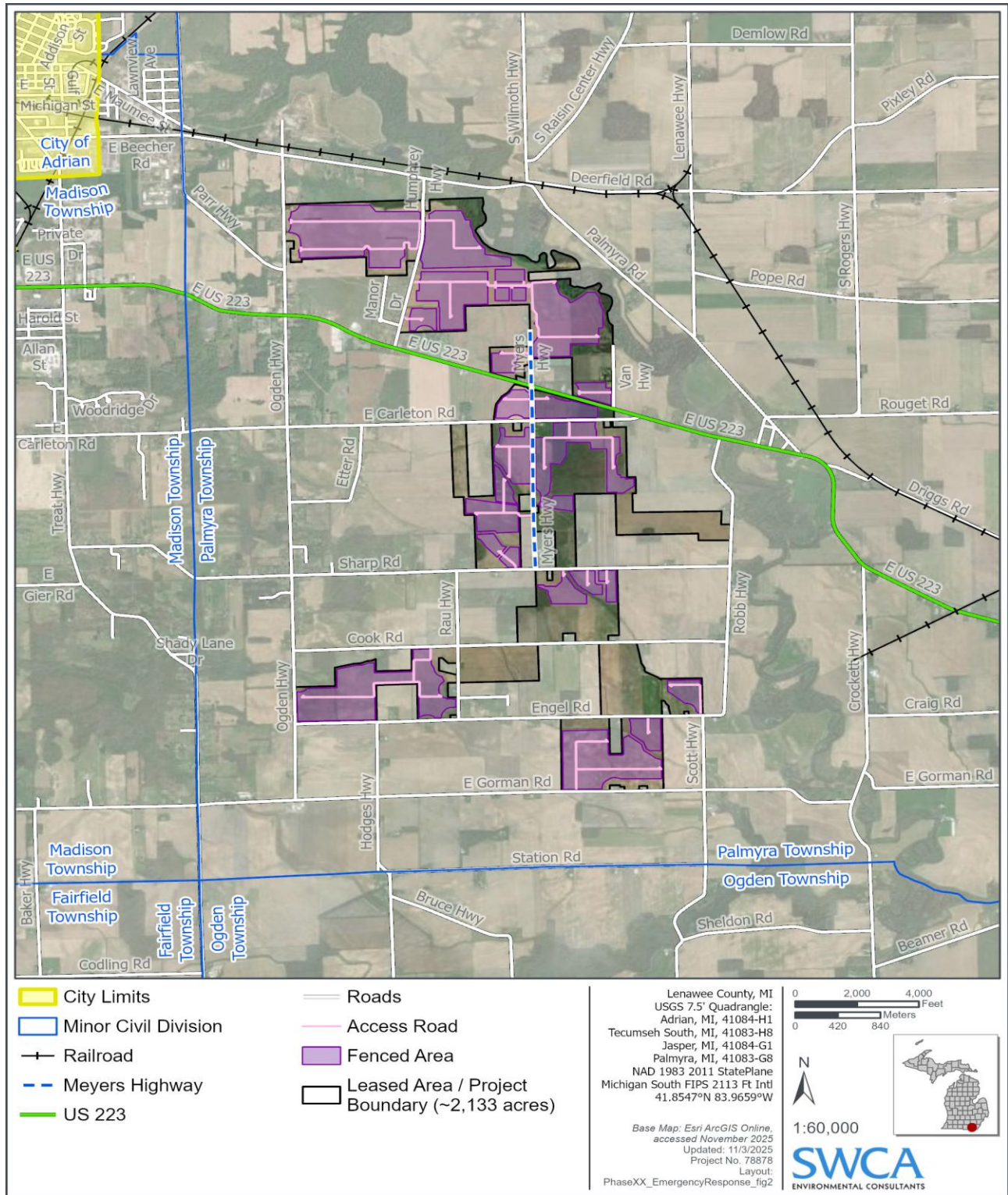


Figure 2. Rouget Road Solar Farm Project site location.

1.3 Plan Review and Development

This ERP will be reviewed and amended if there is a change in facility design, construction, operation, or maintenance that affects emergency action planning. This ERP will be reviewed at least annually internally and at least once every three (3) years with local fire, EMS, and County Emergency Management; revised plans will be circulated to those agencies.

1.4 Training

Employees or contractors visiting the Project area will have access to and receive training on this ERP whenever it is modified or at least on an annual basis. Employees will also be trained when this ERP is initially implemented. Contractors and visitors who enter operating areas of the Project area will be trained on evacuation procedures before they enter for the first time and at least annually thereafter. Evacuation drills will be conducted by the Facility Manager at least twice a year. A list of contractors with current training on this ERP will be maintained at the construction trailer during construction and at the O&M building, once built, for reference purposes. Employees and contractors will be provided with and use the required personal protection equipment (“PPE”) based on the expected hazards of their work.

See Exhibit A-1.10 Fire Response Plan for site-specific training commitments (pre-operation and upon request) with local responders.

1.4.1 Local Capacity Analysis

Rouget Road Solar is not currently aware of either deficiencies in existing local emergency response capacity or deficiencies in specific equipment or training for local emergency response capacity. Rouget Road Solar and the local emergency response team will meet prior to the Rouget Road Solar Project going operational to review Palmyra Fire Department equipment, Lenawee EMS capabilities, and other services to identify potential gaps in capacity, training, equipment, and level of staff. If gaps are identified, Rouget Road Solar will work with local emergency officials to find solutions and schedule any additional drills or training identified. Also, during this meeting, Rouget Road Solar will provide points of contact, gate keys/codes, and finalized maps/layouts of the facility as part of this emergency response plan.

2 CONTINGENCY EMERGENCY RESPONSE PLANS

The following contingencies represent conditions that pose a potential safety, health, or security risk to personnel, visitors, or the surrounding community. These events require clear response protocols, trained staff, and strong coordination with local emergency services. The procedures below outline the actions to be taken to protect life, stabilize the incident, and secure the Rouget Road Solar Farm facility.

2.1 Electrical Hazards

Access to locations containing energized electrical equipment will be restricted at all times. Warning signage compliant with the National Electric Code (“NEC”) will be posted to prevent unauthorized entry. In the event of an electrical hazard, only qualified electrical personnel will respond. These personnel will utilize appropriate PPE, including arc-rated clothing, insulated gloves, and voltage-rated tools.

If energized equipment becomes damaged or presents an imminent hazard, responders will isolate and de-energize the affected equipment following the facility’s lockout/tagout (“LOTO”) protocols. The area will be secured until the hazard is mitigated. Personnel within the immediate hazard area will evacuate to a

designated safe zone, with distancing requirements determined by the Site Manager based on equipment type and voltage class.

2.2 Severe Weather Events

During construction and operations, the EPC Contractor and O&M team will continuously monitor National Weather Service (“NWS”) alerts and local forecasting tools. When severe weather may affect the site, real-time notifications will be issued to personnel.

During periods of high fire danger, potential sources of fire ignition (e.g., vehicle exhaust systems, cigarettes, matches, propane torches, sparks from hot work operations, etc.) must be used with extra caution. During periods of thunderstorms, personnel will remain alert to heavy rainfall in the area. Notifications of flooding or flash floods will trigger suspension of field work, and personnel will be directed to predesignated shelters. High winds or tornado warnings will trigger suspension of elevated work and securing of loose materials. Lightning or thunderstorm activity will activate shelter-in-place protocols, with personnel directed to predesignated indoor shelters, including the O&M building. Snow, ice, or hail events will prompt cessation of field activities and inspection of access roads and equipment. Work will not resume until conditions are deemed safe by the Site Manager.

Following any severe weather event, facility equipment will be evaluated for damage by the SSO, and repairs will be performed under standard operational procedures.

2.2.1 Wildfires

Wildfires are uncontrolled fires that burn in wildland vegetation, often in rural areas. Wildfires can ignite from natural occurrences and human-generated sources. They may begin unnoticed, spread quickly, and are often signaled by dense smoke that may be visible for miles. A combination of weather conditions, fuel availability, topography, temperatures, and rainfall often determine the severity and growth of wildfires. Drought conditions contribute to the likelihood of wildfire outbreaks, particularly in the summer months. In the event of a wildfire, the following procedures will apply: Remain alert to signs of wildfire in your immediate area and maintain awareness of changes in the direction of wind or smoke.

- Determine the relative location and size of the fire and take immediate action, as appropriate.
- Alert the Facility Manager.
- Follow the emergency response protocol.
- Evacuate and/or go to the designated assembly area.
- Protect yourself from smoke. Cover your nose and mouth with a face mask, cloth, buff, or scarf. If in a vehicle, roll-up windows and close air vents. Drive slowly with headlights on. Watch for other vehicles and pedestrians. Do not drive through areas of heavy smoke.
- Stay tuned to local news, emergency alert systems, weather forecasts, and updates for the latest statements, watches, and warnings.
- Do not try to outrun the fire; wildfires can move at speeds of up to 20 miles per hour.
- Do not re-enter the site until given approval by the Facility Manager.

2.2.2 Flooding and Flash Flood

Flash flooding is the result of heavy localized rainfall, such as that from slow moving, intense thunderstorms. A flash flood often results from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water that rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30 minutes to 6 hours of a heavy rain event. In hilly terrain, flash floods can strike with little to no advance warning. Distant rain may be channeled into gullies and ravines, causing flash flooding in minutes. In the event of a flash flood, the following procedures shall apply:

- During periods of thunderstorms, remain alert to heavy rains in your immediate area or upstream from your location. It does not have to be raining at your location for flash flooding to occur.
- Do not drive through flooded areas, even if it looks shallow enough to cross.
- Do not cross flowing streams on foot where water is above your ankles.
- Be especially cautious at night. It is harder to recognize water danger in the dark.
- Do not attempt to outrace a flood on foot. If you see or hear it coming, move to higher ground immediately.
- Be familiar with the land features where you work. The site may be in a low area, near a drainage ditch, or small stream.
- Stay tuned to weather forecasts and updates for the latest statements, watches, and warnings concerning heavy rain and flash flooding.
- Wait 15 to 30 minutes, or until high water recedes.

2.2.3 Tornado

Upon the issuance of a tornado warning, site personnel will evacuate the site and report to the pre-designated shelter area. In the event site personnel are outside and unable to evacuate to the shelter, the following procedures will be followed:

- Lie flat in a nearby ditch or depression and cover the head with the hands. Be aware of the potential for flooding.
- It is safest to leave a vehicle for safe shelter.
- Beware of flying debris.

2.2.4 Lightning Storm

In the event a lightning storm is within 10 to 30 miles and is approaching the Project area, the following procedures will apply:

- Notify the SSO and on-site employees.
- If lightning approaches within 5 miles, stop work and get in and stay in company or personal vehicles that have rubber tires.

Remain in vehicles for at least 30 minutes depending on passing storm severity and wait for an OK from the SSO in charge for monitoring the storm.

Lightning can be a source of fire in the Project area and the surrounding area. Areas of lightning strike should be monitored for signs of ignition.

2.2.5 Snowstorm

Before winter approaches, the SSO will ensure adequate supplies, including the following:

- Sand to improve traction.
- Snow shovels and other snow removal equipment.
- As needed, service agreement(s) with snow removal vendors.

When winter weather threats exist, the SSO will monitor local news channels for critical information from the National Weather Service to stay alert to changing weather conditions. Winter storm watches, warnings, and advisories are issued by local National Weather Service Forecast Offices.

Extreme and fluctuating weather conditions, including high humidity, freezing temperatures, and ice storms, can cause ice to form on power lines. Ice weight can put a lot of stress on power lines and damage equipment. Snow, rain, or freezing rain can also create conditions to start pole fires. In the event of damaged poles or ice on power lines, the SSO will notify the site owner. If site personnel notice excessive ice buildup on a section of lines or downed lines, they will notify the SSO and take the following precautions:

- Stay clear of low or sagging lines and remember that traveling under these lines can be dangerous.
- Treat a downed line as though it is energized and keep other personnel away.
- Do not get out of your vehicle if the vehicle accidentally comes into contact with a downed line. If it is safe to do so, back slowly away from the line or wait for help to arrive.

Depending on the severity of the winter storm, the site may be closed.

2.3 Physical Security Breaches

If unauthorized access, vandalism, or any suspected security breach occurs, security alarms will activate, and local law enforcement will be contacted immediately. Site entry points will be secured until the threat is resolved.

Following the incident, the Site Manager will coordinate with law enforcement to inspect for property damage, missing equipment, and safety impacts. Personnel located near the affected area may be relocated to designated safe zones if the breach presents a credible risk to health or safety.

2.4 Cybersecurity Breaches

For any suspected cybersecurity compromise affecting operational systems or data infrastructure, personnel will immediately notify the designated IT security contact. Access to impacted systems will be restricted, and internal monitoring protocols will be applied to prevent escalation.

If operational control systems are affected, the Project will transition to manual oversight procedures until system integrity is restored. Staff will be instructed not to access or use compromised systems, and all communications will follow internal cybersecurity incident procedures. The Project's IT and cybersecurity teams will lead the investigation and remediation.

2.5 Mechanical Failures

When mechanical equipment malfunctions or presents a safety risk, work in the affected area will be stopped immediately. The area will be isolated until maintenance personnel assess and repair equipment. Routine inspections and preventative maintenance programs reduce the likelihood of mechanical failures.

If a mechanical failure creates a risk of injury (e.g., moving parts, stored energy, structural instability), personnel will evacuate the hazard zone. The evacuation radius will be determined by the Site Manager based on equipment characteristics and failure severity.

2.6 Chemical Spills

Chemical spill response will follow established spill-prevention and spill-control procedures. Inverters and transformers may contain insulating oils, and spill kits will be staged at strategic locations throughout the site.

In the event of a spill, personnel will isolate the area, deploy absorbent materials or contaminant booms, and notify trained spill-response staff. Depending on spill volume and material type, the Site Manager may initiate evacuation from the immediate vicinity. Larger spills or those posing a potential off-site impact will trigger notification to environmental emergency services and the Michigan EGLE Pollution Emergency Alerting System (“PEAS”).

2.7 Personnel Injuries and Serious Health Conditions

If a medical emergency occurs, onsite personnel will immediately call 911. Personnel trained in first aid or CPR may provide care if conditions allow. Emergency responders will be escorted directly to the incident location.

All workers and visitors will be briefed on emergency medical procedures, including locations of first aid kits, AEDs (if installed), and emergency contacts. Serious injuries will be documented and reported to OSHA or other required entities. Minor injuries will be directed to appropriate off-site medical treatment facilities.

To prepare for these contingencies, all operating personnel, and as many other on-site personnel as possible, will be trained in Cardiopulmonary Resuscitation (“CPR”), bloodborne pathogen awareness, and the use of an Automated External Defibrillator (“AED”). AEDs will be located in clearly marked and accessible areas known to all staff. Each site will also maintain at least one fully stocked first-aid kit in the control house and one in each site vehicle; these kits will be inspected at least monthly. The nearest approved non-emergency medical facility and occupational nurse contact information will be posted on site, although emergency responders will determine the final destination for emergency care.

If present, AEDs will be inspected every 90 days (or per manufacturer recommendations) and tested at least once every six months. Records of inspections, testing, and employee training will be maintained, and employees will receive annual notification and refresher training on the location and use of the AED.

Basic First Response Actions

Personnel discovering an injured or unresponsive individual should:

- Check for responsiveness and breathing;

- If the individual is unresponsive, immediately call 9-1-1 and direct another person to retrieve the AED;
- Assess airway and breathing; clear visible obstructions if present;
- If not breathing and no pulse is detected, begin CPR and continue until the AED is available;
- Once the AED arrives, follow all device prompts while continuing CPR (if applicable) until medical personnel arrive.

If the victim is conscious but severely injured or in visible shock, call 9-1-1 immediately. Do not attempt to move the individual unless remaining in place would create additional danger. Keep the victim still, control any profuse bleeding with direct pressure, immobilize injured limbs, and provide reassurance until emergency responders arrive.

Special Considerations

- **Electric Shock:** If electricity is involved, turn off the power source if possible and safely remove the victim from contact using non-conductive material. Begin CPR/AED only after the victim is no longer in contact with the electrical source.
- **Burns:** Cool the affected area, remove restrictive jewelry if safe, and never apply ointment or remove adhering clothing. Seek professional medical assistance promptly.
- **Heat Stroke / Heat Exhaustion:** Move the victim to a cool environment, begin active cooling (water/fanning), and elevate feet if the individual shows signs of heat exhaustion or shock. Rapid cooling is critical in cases of heat stroke and can be lifesaving.

2.8 Capacity or Transmission Emergencies

In the event of a grid disturbance, transmission fault, or utility-initiated emergency, Rouget Road Solar personnel will coordinate immediately with the interconnecting utility. Operational curtailment or shutdown may be required to stabilize the system.

If an emergency originates onsite – such as a transformer fault or relay malfunction – qualified personnel will isolate and secure the affected equipment. All actions will adhere to the Project’s electrical safety procedures and utility coordination protocols.

2.9 Traffic Incidents

If a traffic incident occurs involving construction or operations vehicles, the affected area will be secured, and emergency services contacted if injuries or hazards are present. Workers will be instructed to avoid the area until cleared.

All vehicle operators will adhere to designated haul routes, onsite speed limits, and safe driving practices. Spotters or flaggers will support heavy equipment movement, low-visibility conditions, or delivery activities. Traffic incidents will be reported to the Site Manager and law enforcement as needed.

3 EVACUATION PROCEDURES

Evacuation procedures are implemented when hazards present a risk to personnel safety or require movement to designated muster areas. During significant emergency situations at or near the Project area, the Facility Manager, in consultation with law and/or fire authorities, may issue an evacuation notice. When an evacuation has been called, on-site employees will gather at the designated assembly area. The Facility Manager will account for personnel. Once employees are accounted for, they will safely travel from the Project area to safe zone, which are generally areas off-site away from the threat. Supervisors and the SSO will perform a sweep of the facility to locate persons and reconvene at the designated assembly area. Once personnel are accounted for, they will exit the site.

All evacuation routes and muster point maps will be posted throughout the facility and reviewed during the safety orientations. The primary evacuation routes will be west on State Highway 233 (see Figure 3).

3.1 Electrical Hazards

Electrical hazards generally do not require full-site evacuation. However, personnel within the immediate hazard zone will evacuate to a designated safe area. Evacuation distances will reflect voltage class, equipment type, and Site Manager judgement.

3.2 Severe Weather Events

During severe weather, personnel will move to designated indoor shelter locations. If an evacuation is required, predetermined egress routes will be used unless conditions render them unsafe, in which case alternate muster points may be established. Personnel accountability will be confirmed at muster points through sign-in logs.

3.3 Physical Security Breaches

Security breaches typically require localized relocation rather than full-site evacuation. Personnel in proximity to the incident may be moved to secure locations at the discretion of the Site Manager.

3.4 Cybersecurity Breaches

Cybersecurity incidents do not require physical evacuation.

3.5 Mechanical Failures

Mechanical failures may warrant localized evacuation if the malfunction presents a risk of injury. Evacuation distances will be established based on equipment characteristics and operational risks.

3.6 Chemical Spills

Chemical spills generally require evacuation only from the immediate area. Evacuation boundaries will be established by the Site Manager based on spill volume, material type, and risk of ignition or exposure.

3.7 Personnel & Visitor Medical Emergencies

Evacuation procedures focus on providing EMS responders with clear access to the incident location while relocating uninvolved personnel away from the area.

3.8 Capacity or Transmission Emergencies

These events do not typically require evacuation unless electrical hazards or equipment failures create a localized safety risk.

3.9 Traffic Incidents

Traffic incidents do not require full-site evacuation. Personnel will avoid the affected area until cleared.

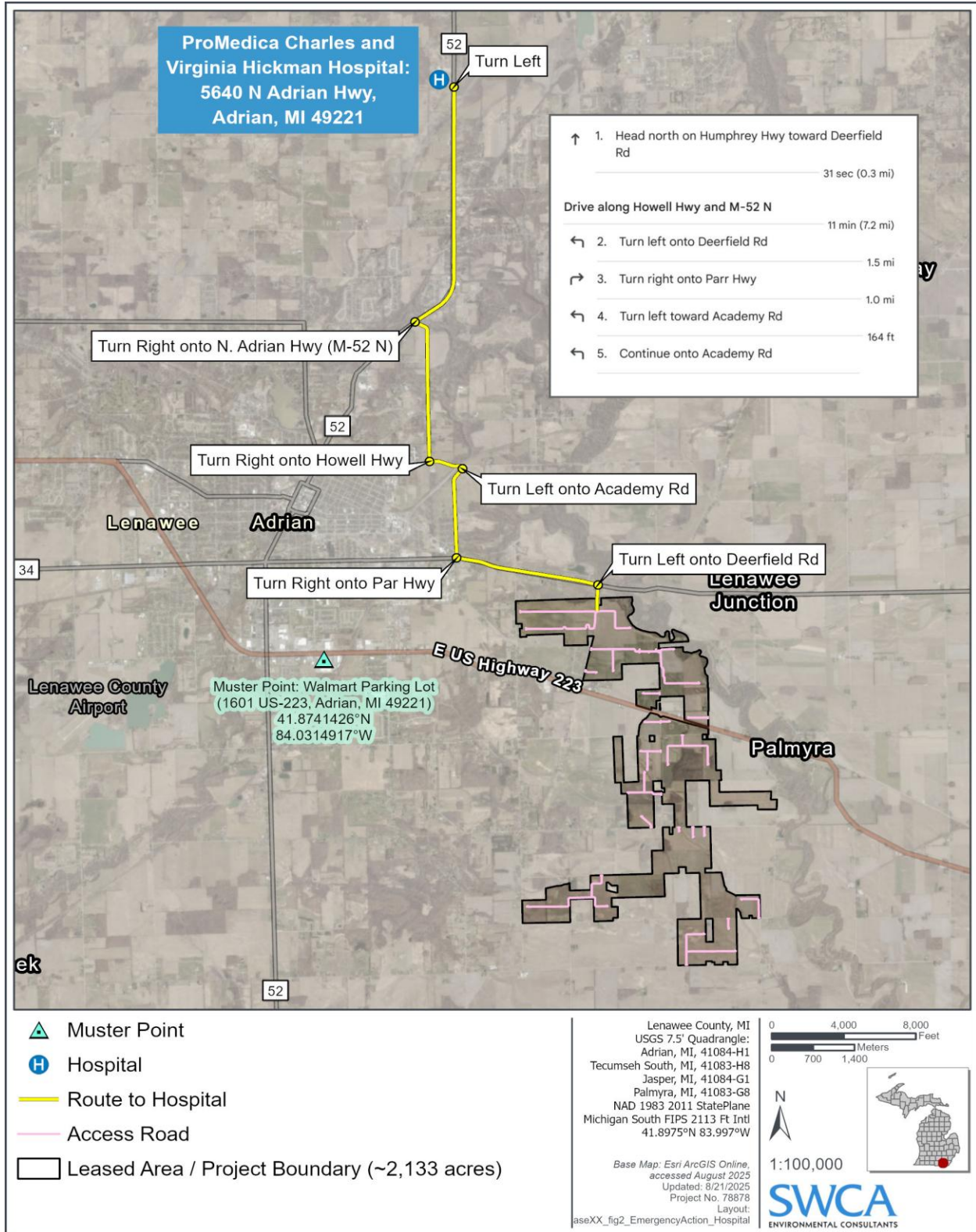


Figure 3. Fire and ambulance response access and route from Project site to Hospital, Emergency Evacuation and Muster Area.

4 CONTINGENCY COMMUNICATION AND COMMUNITY NOTIFICATION

In accordance with AFIP §7.9(a)(5) and the MPSC, the Facility Manager shall ensure that timely and accurate notifications are made to community members and emergency response partners in the event of any contingency that could pose a risk to public health, safety, or the environment.

The Facility Manager, in coordination with Lenawee County Emergency Management, the Palmyra Township Fire Department, and other responding agencies, will utilize the County's emergency alerting systems (e.g., CodeRED, Nixle), local radio and television, and the Project website to provide emergency information to the public.

The following table outlines the community notification procedures by contingency, identifying notification triggers, required actions, dissemination methods, and responsible personnel.

Table 1: Community Notification Procedures by Contingency

Contingency Event	Notification Trigger	Primary Notification Actions	Dissemination Channels	Responsible Personnel
Electrical Hazard (e.g., downed line, energized fence, transformer fire)	Discovery of downed or damaged high-voltage equipment	Call 911 and project electrical contractor; isolate area and notify adjacent landowners if hazard extends offsite.	County emergency alert system (if warranted), Project website update	Facility Manager; Electrical Safety Officer
Severe Weather (e.g., tornado, high winds, flood)	National Weather Service (NWS) warnings or local emergency alerts that would pose a threat to the facility that could be harmful to the community	Notify all onsite personnel and suspend onsite operations; coordinate with Lenawee County Emergency Management for public alert issuance.	County CodeRED/Nixle alert systems, local radio, Project website update	Facility Manager; County Emergency Management Director
Physical Security Breaches (e.g., trespass, vandalism, bomb threat)	Confirmation or credible report of threat	Contact law enforcement and activate site lockdown procedures; notify adjacent landowners if safety risk is possible.	County alert system (if warranted), local media release coordinated with law enforcement	Facility Manager; Lenawee County Sheriff's Office
Cyber Security Breaches	Discovery of cyber breach that results in operational disruption or potential safety impacts	Local emergency management and law enforcement will be notified.	County alert system (if warranted), local media release coordinated with law enforcement, Project website update.	Facility Manager; County Emergency Management Director, Lenawee County Sheriff's Office
Mechanical Failures	Discovery of failures that could impact community, such as noise or debris	Local emergency management	County alert system (if warranted), local radio, Project website update.	Facility Manager; County Emergency Management Director
Chemical Spill or Hazardous Release	Release of fuel, oil, or hazardous material exceeding reportable quantities	Notify 911 and Michigan EGLE Pollution Emergency Alerting System (PEAS); initiate containment; notify public if offsite migration possible.	County CodeRED/Nixle alert, local radio, Project website update	Facility Manager; Environmental Health Officer; County Emergency Management
Medical Emergency or Fatality	Serious injury, or fatality onsite	Call 911, provide immediate aid, and secure scene; notify corporate Health and Safety and County emergency personnel.	Direct coordination with EMS and fire personnel (no public alert unless community exposure risk)	Facility Manager; Onsite Safety Lead

Contingency Event	Notification Trigger	Primary Notification Actions	Dissemination Channels	Responsible Personnel
Electrical Hazard (e.g., downed line, energized fence, transformer fire)	Discovery of downed or damaged high-voltage equipment	Call 911 and project electrical contractor; isolate area and notify adjacent landowners if hazard extends offsite.	County emergency alert system (if warranted), Project website update	Facility Manager; Electrical Safety Officer
Capacity or Transmission Emergencies	Event that could result in service disruption or pose public safety risk	Local emergency management	County alert system (if warranted), local radio, Project website update.	Facility Manager; County Emergency Management Director
Traffic Incidents	Incidents that impact public roadways or access	Law enforcement and local emergency management will be notified.	County alert system (if warranted), local radio	Facility Manager; County Emergency Management Director, Lenawee County Sheriff's Office

4.1 Incident Reporting

Prompt and accurate reporting and investigation of work-related incidents, which include injuries, illnesses, and near misses, or accidents that could have caused serious injuries, are necessary components of effective accident prevention programs. This information can be used in evaluating and preventing hazards, fulfilling mandatory recordkeeping requirements, and filing for workers' compensation benefits. Incidents resulting in personal injury and/or illness require that the appropriate Office of Worker's Compensation Programs and Department of Labor procedures are followed, and forms are completed.

The Facility Manager is the primary point of contact for planned and unplanned outages. The Facility Manager will notify required parties, including the operation centers of utilities and asset management/owners, and field personnel via email for organized record keeping. Field personnel will be copied for informational purposes and seamless communication. Communication will be directed toward the Facility Manager unless the Facility Manager defers to a specific field supervisor/technician. The same protocol will be followed for reporting updates, including the root cause of an outage.

Emergencies, especially ones that involve property damage, will be reported as soon as possible to the Facility Manager. This includes both O&M personnel and temporary construction personnel during the construction and decommissioning phases. The Facility Manager will notify personnel of the situation and request dispatch, which may include requesting photographs that document the damage. Each facility or work area will maintain their own recordkeeping forms for injuries/illnesses.

4.2 Emergency Notification Procedures

An emergency at or near the Project area will trigger the emergency notification procedures identified in this section. The first call should be to 911 so that appropriate authorities can be notified and appropriate apparatus and personnel dispatched. Travel times to the Project area require notification of 911 as early as possible after a fire or other emergency has been observed. Emergency reporting is critical for tracking where, when, how, and why fire ignitions or other emergencies occur and will help the fire agencies develop protocols for reducing their occurrence.

A list of personnel who will be the primary points of contact to be notified during a fire emergency will be provided by the general contractor during construction and decommissioning, and by the O&M services contractor during operation. Personnel contact information will include on-site Project team members and additional on-site personnel.

4.3 Evacuation Communication Protocol

If field personnel must travel out of the immediate area to seek refuge and/or may lose the ability to access the site's Supervisory Control and Data Acquisition system (loss of power, cell service, or internet), the Facility Manager will hand off the primary point of contact and site operator role to the Remote Operation Center.

4.4 Post-Incident Public Communication

Following any incident that triggers public notification, the Facility Manager and Rouget Road Solar Farm corporate communications team will prepare a post-incident summary for distribution to local emergency management, Township officials, and the public. This will include a description of the event, response actions taken, and measures implemented to prevent recurrence.

5 EMERGENCY RESPONSE PROCEDURES

This ERP applies only to emergency actions to be taken in the Project area. After an evacuation, personnel will be governed by emergency plans of their respective agencies and/or local government authorities.

In reporting fires and other emergencies, the first call should be to 911 so that the appropriate apparatus can be dispatched. To facilitate the arrival of fire services during construction, an emergency response meeting point will be established. The SSO or designee will meet the emergency response team to lead them into the Project area.

5.1 Roles and Responsibilities

Employees should know how to prevent and respond to fires and are responsible for adhering to company policy regarding fire emergencies. The following sections detail general responsibilities by position.

5.2 Project Owner/Management

The Project owners/management are responsible for implementing necessary measures to reduce fire risk and comply with federal, state, and local fire safety/protection policies. Additionally, Project owners/management are responsible for making necessary training and equipment available to provide a safe working environment for employees and contractors.

5.3 Facility Manager

The Facility Manager will be responsible for the following:

- Directing occupants to the prescribed evacuation routes and notifying the Remote Operation Center of actions and updates.
- Ensuring that personnel know the evacuation procedures.
- Directing an orderly flow of personnel during drills and actual emergencies and reporting to the Remote Operation Center when their site has been evacuated completely.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

5.4 Remote Operation Center

The Remote Operation Center will be responsible for the following:

- Initiating action deemed necessary by the Facility Manager in an emergency.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

5.5 Site Safety Officer

The SSO will manage the ERP for the Project and will maintain records pertaining to the ERP. The SSO is also responsible for the following:

- Understanding the ERP and its mandates for training, fire prevention, fire suppression, and evacuation.
- Understanding the risk associated with the Project and with activities that will occur within the Project area.
- Developing and administering the risk prevention and safety training program.
- Ensuring that fire control equipment and systems are properly maintained and in good working condition.
- Monitoring combustibles on-site and managing where they are stored.
- Conducting safety surveys and making recommendations to the site manager.
- Stopping Project work activities that pose a hazard or are not in compliance with this ERP.
- Reporting fires ignited in the Project area—whether structural, vegetation, electrical, or other—to the fire department.

5.6 Supervisors

Supervisors are responsible for the following:

- Ensuring that employees receive appropriate fire safety training.
- Notifying the SSO when changes in operation increase the risk of fire.
- Enforcing fire prevention and protection policies.
- Accounting for employees/contractors in the case of an evacuation.
- Performing Project area sweeps to round up staff in the case of an evacuation.
- Facilitating fire agency access to the Project area.
- Cooperating with the fire agencies during and after fires.
- Identifying unsafe work practices that may lead to fire ignitions and correcting those practices in coordination with the SSO, as appropriate.

5.7 Employees/Contractors

Employees and contractors are responsible for the following:

- Completing required training before working in Project area without supervision.
- Conducting operations safely to limit the risk of fire.
- Reporting potential fire hazards to their supervisors.
- Following fire emergency procedures.
- Understanding the emergency evacuation protocols.

5.8 Emergency/Incident Command

As the facility does not store or have hazardous materials, store fuels, or contain or store chemicals in a quantity that would potentially create an incident that requires ICS it is not anticipated the facility would need to lead an ICS response. However, if an incident were to arise which would require the need for ICS, the facility would fall under Lenawee County ICS and provide a Site Liaison and Site Safety Officer to work and coordinate with Lenawee County as needed.

5.9 Contact Information

The personnel listed in Table 2 are the primary site contacts to be notified during an emergency. The specific personnel will be determined prior to that start of construction and the ERP will be updated accordingly.

Table 2. Primary On-Site Emergency Notification Contacts

Name	Position	Telephone Number
To be determined ("TBD")	SSO	TBD
TBD	Construction Supervisor	TBD

Name	Position	Telephone Number
TBD	EPC Foreman	TBD
TBD	Facility Manager	TBD
TBD	Construction Supervisor	TBD

Table 3 is a list of emergency-related contacts near the Project area¹.

Table 3. Emergency-Related Contacts near the Project Area

Emergency Service	Contact	Telephone Number
Fire	Palmyra Fire Department	(517) 605-4158
Fire	Madison Charter Township Fire Department	(517) 265-6560
Ambulance	Lenawee Community Ambulance	(517) 423-1822
Lenawee County Sheriff	Sheriff Troy Bevier	(517) 263-0524
Michigan State Police	Brighton Post	(734) 475-7207
Hospital	Maria Health Care Center	(517) 266-3600
Michigan Occupational Safety and Health Administration	Lansing, Michigan, office	(517) 284-7750

¹ These Contacts will be updated and provided prior to construction starting

Attachment 1
July 23, 2025 Meeting Minutes

Meeting Minutes

Date: July 23, 2025

Time: 11am – 12:30pm

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan, Assistant Chief Brian Wilcox, and Firefighter Jeff Jackson.
- Lenawee County Emergency Management Team:
- Chris Foerg – Emergency Regional Planner.
- Craig Tanis – Emergency Management Coordinator.
- RWE Staff: Kevin Cole, Tim Love, and Alannah Woodring.

Topics Discussed: This was a joint meeting with the Lenawee County Emergency Management and Palmyra Fire Department. The Madison County Fire Department was invited but could not attend. Kevin Cole provided an overview of the project site plan and MPSC permitting requirements as well as the draft Emergency Response Plan and Fire Response Plan. An electronic copy of the plans was sent to the agencies on July 24, 2025 for review.

Following are the minutes based on the meeting transcript:

1. Purpose of Meeting

- Provide a safety and technical overview of the proposed Palmyra solar project.
- Establish communication channels between RWE, the Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Review safety protocols, emergency response planning, and project impacts from construction through decommissioning.

2. Project Overview

- Location: Southeastern Michigan, (Palmyra area).
- Current status: ~10% design phase; equipment not yet finalized.
- Site details:
 - ~2,000 acres leased.
 - ~1,234 acres expected inside the fenced project footprint (subject to updates for wetlands/habitat).
- Solar panels: 540–610 watts each, mounted on motorized trackers (25 ft. max height, ~30 in. clearance).
- Electrical system: DC → combiner boxes → inverters → transformers. Stepped up to ~34,500 volts AC before substation interconnection. DC side always energized in presence of light.
- Setbacks & fencing:
 - 50 ft. from roadways.
 - 150 ft. from non-participating property lines.
- Each solar block fully fenced for safety and security.

3. Safety & Emergency Response Procedures

3.1 General Safety

- Situational awareness and controlled communication emphasized.
- Incident Action Plans to be developed for fire, medical, and electrical incidents.

3.2 Fire & Electrical Hazards

- Defensive firefighting approach:
- Electrical fires: allow to self-extinguish.
- Brush/grass fires: water permitted >25 ft. from electrical equipment.
- Acceptable extinguishers: Class C, CO₂, or clean agent.

- Primary risks: vegetation ignition or electrical faults in panels/combiner boxes/inverters.
- No battery storage facility included in this project.

3.3 Access & Coordination

- 24/7 system monitoring via RWE dispatch (Austin, TX). Contact info to be provided to local dispatch.
- Road network: 16-ft wide gravel drives with durable base for heavy vehicles.
- Gates: labeled for mapping and quick emergency access.
- O&M Building: To be co-located near the substation. Equipped with extinguishers, AEDs, staffed by ~4 local permanent employees.
- Emergency support: RWE staff will meet responders at gates. ATVs/UTVs available for patient transport within the field.

4. Vegetation & Fire Prevention

- RWE responsible for mowing/brush clearing inside and outside fences.
- Vegetation kept minimum 8 inches below lowest panel height.
- Roads and fences serve as fire breaks.
- A wildfire risk management plan is under development, factoring in local weather/vegetation growth patterns.

5. Decommissioning & Recycling

- Construction: steel piles driven (not concreted) except at substation. All removable.
- Panels:
- May be resold, donated, or recycled.
- RWE partnered with SolarCycle for panel recycling solutions.
- Life expectancy: ~30 years, with option for 10-year extension.

6. Questions & Concerns Raised

- Drainage systems: Damaged tile drains will be flagged, repaired, and covered under warranty.
- Hazmat risk: Solar panels mainly glass/silica; hazards similar to household fires.
- Accessibility: Firefighters will be met at gates; not expected to locate victims alone.
- Fire suppression: Confirmed defensive-only approach for electrical fires.
- Security: Full fencing prevents trespassing.
- Community impact: RWE committed to supporting fairs, schools, fire departments, and 4H programs.

7. Follow-Up Actions

RWE to provide:

- Dispatch contact details, site maps, and labeled gate IDs.
- Annual Tier II hazardous materials reports and updated emergency contact lists.
- Joint training and site orientation to be scheduled prior to commissioning.
- Facility tours: possible during “Golden Row” construction phase and before operations begin.
- Emergency response plan will be collaboratively developed with the Palmyra Fire Department and Lenawee County Emergency Management Team and refreshed annually.

8. Closing

- Meeting built stronger relationships between RWE, Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Emphasis on safety-first operations, defensive firefighting posture, and transparent communication.
- Contact information exchanged; ongoing updates and training commitments reaffirmed.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment.

Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Insert PDF – Email to Paul 7/24/25 with ERP and FRP

Date: August 6, 2025

Time: 12:57 pm via text message

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan,
- RWE Staff: Kevin Cole

Topics Discussed: Paul stated that he had no comments/edits for the ERP or FRP at this time. Paul will reach out if a question or need arises.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment. Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Rouget Road Solar Farm

Exhibit A-1.10: Fire Response Plan MPSC Requirements

Lenawee County, Michigan

DECEMBER 2025

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-1.10 – FIRE RESPONSE PLAN (FRP)

A-1.10.(a) – The FRP shall include the following:

- 1. Evidence of consultation or a good-faith effort to consult with local fire department representatives to ensure that the FRP is in alignment with acceptable operating procedures, capabilities, resources, etc. If consultation with local fire department representatives is not possible, provide evidence of consultation or a good-faith effort to consult with the State Fire Marshal or other local emergency manager.**

The Applicant has consulted with local fire department representatives and shared the FRP for ongoing consultations to ensure the FRP complies with the acceptable operating procedures (see Section 1.1 of the FRP in **Appendix II Exhibit A-1.10**). A meeting was conducted on July 23, 2025 to discuss the Project and FRP. A copy of the meeting minutes is provided in **Appendix II Exhibit A-1.10**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19.

- 2. A description of all on-site equipment and systems to be provided to prevent or handle fire emergencies.**

Section 2 of the FRP in **Appendix II Exhibit A-1.10** describes proactive measures to prevent fires such as routine mowing of vegetation, outfitting the Site with fire preventative equipment, and enforcing hot work (i.e. welding, cutting, grinding) protocols. Section 2 of the FRP notes that portable ABC-rated fire extinguishers will be strategically located throughout the Project Area including facilities buildings. Section 2 of the FRP details the requirements for hot work within the Project Area. Hot work requires the area be cleared of flammable material and post-work monitoring to ensure fires are avoided.

For more information, see also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19.

- 3. A description of all contingency plans to be implemented in response to the occurrence of a fire emergency.**

Section 3 of the FRP in **Appendix II Exhibit A-1.10** outlines the contingency procedures for treating and reporting fires.

- 4. For energy storage projects, a commitment to offer to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and at least once per year while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.**

The proposed Project is not an energy storage facility and thus the standards for approval in Exhibit A-1.10(a)(4) do not apply.

- 5. For wind and solar projects, a commitment to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and upon request while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.**

The proposed Project commits to training Project personnel and local emergency responders (see Section 4 of the FRP in **Appendix II Exhibit A-1.10**).

6. A commitment to review and update the FRP with fire departments, first responders, and county emergency managers at least once every 3 years.

The Project commits to reviewing and updating the FRP every three years and immediately following any fire incident, significant equipment modification, or emergency drill (see Section 5 of the FRP in **Appendix II Exhibit A-1.10**).

7. An analysis of whether plans to be implemented in response to a fire emergency can be fulfilled by existing local emergency response capacity. The analysis should include identification of any specific equipment or training deficiencies in local emergency response capacity and recommendations for measures to mitigate deficiencies.

The Applicant believes the plans can be fulfilled by local fire departments. Ongoing consultations are occurring to confirm. The Applicant is also committed to ensuring there are no equipment or training deficiencies in emergency response capacity. An analysis with the Palmyra Fire Department will be conducted prior to start of construction (see Section 6 of the FRP in **Appendix II Exhibit A-1.10**).

8. Other information the applicants find relevant.

Rouget Road Solar Road has provided a draft FRP in **Appendix II Exhibit A-1.10**. Sections 7 and 8 of the FRP provide for post incident actions and documentation protocols, respectively.

A-1.10.(b) – Changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing must be analyzed to determine if changes are necessary to the FRP. Additional consultation with local fire departments, first responders, and county emergency managers is required for amended plans.

If there are changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing, the Applicant will analyze the FRP to determine if updates are necessary. Additional consultation with the local fire departments, first responders, and county emergency managers is required for amended plans. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19.

Rouget Road Solar Farm

Exhibit A-1.10 Fire Response Plan

Lenawee County, Michigan

DECEMBER 2025

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

**FIRE RESPONSE PLAN
FOR THE ROUGET ROAD SOLAR PROJECT,
LENAWEE COUNTY, MICHIGAN**

Prepared for

Rouget Road Solar Farm, LLC
353 North Clark Street, Suite 3000
Chicago, Illinois 60654
Attn: J. Kevin Cole

Prepared by

SWCA Environmental Consultants
200 West 22nd Street, Suite 220
Lombard, Illinois 60148
www.swca.com

SWCA Project No. 78878

December 2025

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Attachments

Attachment 1. July 23, 2025 Meeting Minutes

1 INTRODUCTION

SWCA Environmental Consultants (“SWCA”), on behalf of Rouget Road Solar Farm, LLC (“Applicant”), a wholly owned subsidiary of RWE Clean Energy Development LLC, has prepared the following Fire Response Plan (“Plan”), which provides guidelines for fire prevention, preparedness, and response procedures during all phases of the Rouget Road Solar Project (“Project”), a 175-megawatt, utility-scale solar project located in Lenawee County, Michigan. This plan complements the Emergency Response Plan and complies with Exhibit A-1.10 of the Michigan Public Act 233, Occupational Safety and Health Administration regulations at 29 Code of Federal Regulations 1926.24, and National Fire Protection Association (“NFPA”) standards. It applies to construction, operation, and decommissioning of the Project.

1.1 Local Consultation

This Plan has been developed in coordination with emergency response providers, including the Palmyra Fire Department, Madison Township Fire Department, Lenawee County Emergency Management, and Lenawee County Sheriff’s Office, in accordance with Occupational Safety and Health Administration standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. It will be the responsibility of the Applicant and its Project contractors to comply with the measures identified in this Plan. RWE met with the Lenawee County EMS and Palmyra Fire Department on July 23, 2025 to discuss the Rouget Road Solar Farm Project and this Plan. Further details on the meeting and coordination with the emergency services is in Attachment 1.

1.2 Project Description

The Project is a proposed 175-megawatt alternating current (“AC”) ground-mounted solar photovoltaic facility located on approximately 2,133 acres in Palmyra Township, Lenawee County, Michigan. Approximately 1,042 acres will be fenced for active solar use.

2 EQUIPMENT, SUPPRESSION SYSTEMS AND PREVENTION PROCEDURES

Portable ABC-rated fire extinguishers will be strategically located throughout the site including the Operations and Maintenance building, main entrance, inverter stations, and transformer areas. Each unit will have signage and unrestricted access. Inspections will be performed monthly in compliance with NFPA 10. Additional fire safety equipment may be installed based on manufacturer recommendations and initial site assessment following construction and fire prevention review by the Applicant. These additional measures will be added to the Plan prior to operations beginning.

2.2 Fire Prevention Strategies

Fire prevention begins with proactive planning and sound site management practices. The Project will implement a comprehensive set of measures to minimize the potential for fire ignition and spread.

All internal combustion engines, both stationary and mobile, will be equipped with functional spark arresters and maintained in good working order. Light trucks and cars with factory-installed mufflers may only be operated on roads cleared of vegetation, and all mufflers and catalytic converter shields will be kept in proper condition. Equipment parking areas and stationary engine sites will be cleared of flammable materials to reduce fire risk.

Vegetation within and around the Project area will be actively managed. This includes routine mowing and trimming beneath and around the solar panels to reduce fuel loads. Dead or combustible vegetation and debris will be regularly removed to maintain a clear buffer around Project infrastructure. In addition, the site will maintain clear access routes for emergency responders and ensure defensible space is preserved around key assets.

The site will be outfitted with appropriate fire prevention equipment. Fire extinguishers will be strategically placed at all construction trailers, within the Operations and Maintenance building, and near high-risk electrical components. These will be inspected on a monthly basis to ensure functionality. Signage with emergency contact information and site maps will be prominently displayed. Access to the site will be secured with perimeter fencing, which includes a Knox Box system to facilitate emergency responder entry. Designated smoking areas will be clearly marked, and smoking outside of these areas will be strictly prohibited.

For operations involving heat, such as welding or grinding, the Project will enforce strict hot work protocols. Hot work will require a permit and will not be allowed during Red Flag Warnings or other high-fire-risk weather events. During permitted hot work, the area will be cleared of flammable material and a trained fire watch will be present and remain on-site for at least 1 hour after the work is completed to monitor for flare-ups or smoldering materials.

2.2.1 Fire Risk Assessment

The Applicant will conduct a fire risk assessment prior to the commencement of construction and updated periodically during the life of the Project. The assessment will evaluate potential ignition sources, availability of fuel (e.g., vegetation, construction materials), local weather patterns (e.g., drought conditions), and emergency response capabilities in the region. This risk profile will be used to guide the placement of suppression equipment, establish vegetation management buffers, and set the frequency and depth of personnel training.

2.2.2 Hot Work and Ignition Source Controls

Hot work (e.g., welding, cutting, grinding) will be strictly controlled through a permit system administered by the Facility Manager. A hot work permit must be obtained prior to initiating any such work. The area will be cleared of flammable material and a trained fire watch will be present and remain on-site for at least 1 hour after the work is completed to monitor for flare-ups or smoldering materials. Work will be prohibited during Red Flag Warnings or other high-fire-risk conditions.

2.2.3 Combustible Material Management

To reduce ignition risks, Class A combustibles (wood, paper, cloth, plastics) will be disposed of daily, stored in proper containers, and kept clear of work areas. Class B combustibles (flammable liquids, gases, and aerosols) will be stored, handled, and dispensed only in approved locations, with bonding and grounding used during transfer. These materials will be kept away from ignition sources, exits, and high-traffic pathways. Class C combustibles (energized electrical equipment) will be de-energized before firefighting whenever possible, with only non-conductive extinguishing agents (e.g., CO₂ or ABC dry chemical) used.

3 FIRE RESPONSE CONTINGENCY PROCEDURES

In the event of a fire, a clearly defined and practiced response protocol is essential to ensure the safety of personnel and protection of property.

Immediate Actions

Upon discovery of a fire, the first action is to contact 9-1-1 to initiate emergency response. The Site Safety Officer (“SSO”) and Facility Manager must also be notified without delay. If the fire poses an immediate threat to personnel or critical equipment, evacuation procedures will be activated. All staff will proceed to designated assembly areas via posted evacuation routes. Supervisors are responsible for accounting for all personnel and ensuring that no one remains in hazardous zones. The SSO or designated staff will meet emergency responders at the site entrance to provide site access, incident details, and escort them to the fire location.

3.1 Fire Type and Management

Fire events will be managed according to the size and type of incident.

- **Small fires**, such as a trash can fire in its early stage, may be controlled with a fire extinguisher if it is safe to do so and the individual has been properly trained. Upon discovery of a small fire, the individual must immediately notify the onsite supervisor, call 9-1-1, and alert other appropriate personnel. Non-essential personnel will be removed from the hazard area. If suppression is safe, the fire may be extinguished, and the site evacuated to the muster point or designated meeting area. Work in the area will cease until the incident commander issues an “All Clear.”
- **Large fires** require immediate evacuation and professional firefighting intervention. The individual discovering must contact the onsite supervisor, call 9-1-1, and ensure all personnel leave the danger area. The Onsite Primary Contact will confirm that emergency services have been dispatched, coordinate the evacuation, and ensure that fire extinguishers are used for escape purposes only. No employee will re-enter the affected area until the Fire Department has assumed command and declared the area safe.
- **Grass and wildland fires** present a unique hazard to solar facilities. The site will be maintained with a low-fuel ground cover beneath and adjacent to the solar racking to minimize ignition potential from ember showers. Vegetation fires under or near the modules or inverters should not be fought with water or chemical agents due to the risk of electric shock or arc flash. If possible, power should be shut down at the inverter using the emergency shut-off. These fires will typically burn out quickly due to the patchy, low-intensity nature of the fuel. If flames spread away from electrical equipment, suppression efforts may be attempted from a safe distance.
- **Hot Work (Welding, Cutting, and Open Flame)** Due to the high fire risk associated with welding, cutting, grinding, or other hot work, these activities will only be performed by authorized personnel following established safety protocols. Welders must wear appropriate PPE, and oxygen-fuel gas systems must be equipped with approved backflow valves and pressure-relief devices. When required, a trained fire watch will be established, and an on-site water source (e.g., water truck or tank) will be maintained. Work areas will be cleared of combustible materials prior to starting, and operations will be suspended during extreme fire weather conditions.

4 TRAINING AND COORDINATION

Fire safety and response are only effective when supported by a culture of training, preparation, and coordination. All site personnel will be trained in the elements of the Fire Prevention Plan relevant to their duties, with a focus on preventing small incidents from escalating into serious threats. Construction and maintenance personnel will be trained and equipped to extinguish small fires when it is safe to do so.

Before beginning work, every employee must complete fire safety training as part of site safety orientation. This training will ensure personnel understand:

- Employee roles and responsibilities;
- Recognition of potential fire hazards;
- Alarm system and evacuation routes;
- Location and operation of manually operated equipment (e.g., fire extinguishers);
- Emergency response and shutdown procedures; and
- Good fire-prevention housekeeping practices and equipment maintenance.

Personnel will also review site-specific hazards, including flammable materials, fuel storage, toxic chemicals, and water-reactive substances. All employees will be required to confirm they understand the function and elements of the Fire Prevention Plan, reporting procedures, evacuation plans, and shutdown processes. Refresher training will be conducted annually and whenever significant changes are made to the facility or the Plan.

Coordination with Emergency Services:

The Applicant will conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and upon request while the facility is in operation. The Project team will work closely with the Madison and Palmyra Township Fire Departments to schedule joint training sessions and familiarize responders with the site layout, hazards, access points, procedures, current best practices, and emergency shutoffs. A preconstruction walkthrough will be conducted, and site plans will be shared with local fire departments to facilitate effective response. Any recommendations for additional equipment or operational changes will be reviewed and incorporated where feasible.

Evacuation Drills:

Drills will be conducted twice per year to ensure staff are familiar with procedures. Evacuation routes and assembly points will be posted throughout the site and reviewed during safety training sessions.

Use of Portable Fire Extinguishers:

- A minimum of one portable fire extinguisher will be located within 65 meters of any work area during construction or heavy maintenance.
- Extinguishers will be inspected monthly, kept unobstructed, and placed in conspicuous locations.

Site Maintenance & Housekeeping:

- Combustible materials will not be stored in mechanical rooms or near electrical panels.
- All electrical panel openings will be covered.

- Power bars will be plugged directly into outlets and used only temporarily.
- Extension cords and flexible cords will not be substituted for permanent wiring.

This coordinated approach, combining comprehensive employee training, strong housekeeping practices, and close collaboration with local fire departments, ensures that both site personnel and emergency responders are aligned in expectations and fully prepared to act in the event of a fire.

5 PLAN REVIEW AND UPDATE SCHEDULE

This Plan will be reviewed and updated every three years and immediately following any fire incident, significant equipment modification, or emergency drill. Updates will be communicated to all staff and shared with the Madison Township Fire Department and Palmyra Township Fire Departments as well as the Lenawee County Emergency Services. Documentation of review cycles and personnel acknowledgment of updates will be maintained on-site.

6 ASSESSMENT OF FIRE RESPONSE CAPACITY AND READINESS

Based on consultation with Lenawee County EMS and the Palmyra Township Fire Departments, current equipment and staffing levels are expected to be adequate for initial response. Rouget Road is not currently aware of any specific equipment or training deficiencies in local emergency response capacity. Further assessment will occur post-construction to identify and address any additional needs. If any deficiencies in response capacity are identified during further assessment, Rouget Road will take steps to identify and recommend measures to mitigate deficiencies.

7 POST-INCIDENT ACTIONS

Following any fire incident, a structured post-incident review will be initiated. This includes conducting a root cause analysis to identify the origin and contributing factors of the incident. Findings will be documented in an incident report and corrective measures will be implemented to prevent recurrence.

Damaged infrastructure will be promptly assessed and repaired or replaced as necessary. This Plan will be reviewed in light of the event and updates will be made to address any procedural gaps or necessary improvements.

Coordination with emergency responders will continue through the post-incident phase to ensure a comprehensive evaluation of response effectiveness. Lessons learned will be shared with the full Project team to improve preparedness and safety protocols going forward.

8 INCIDENT DOCUMENTATION AND REPORTING

All fire events, regardless of size or impact, will be documented using a standardized Incident Report Form. The Incident Report Form will be developed prior to the start of construction. Information collected will include the date and time of incident, exact location, personnel involved, nature and suspected cause of fire, response actions taken, and follow-up measures implemented. These records will be stored for a minimum of 5 years and reviewed regularly to identify trends or improvements.

9 CONTACT INFORMATION

Table 1. Contact Information

Organization	Contact	Role	Phone	Contact Method
Rouget Road Solar Farm, LLC	TBD prior to construction	Facility Manager	TBD	TBD
Palmyra Fire Department	Paul Rohlan	Fire Chief	(517) 605-4158	prohlan@gmail.com
Madison Fire Department	Nic Wilson	Fire Chief	(517) 265-6560	TBD
Lenawee County Sheriff	Troy Bevier	Sheriff	(517) 263-0524	sheriffrecords@lenawee.mi.us
Lenawee County Emergency Management	Craig Tanis	Coordinator	(517) 264-4756	https://www.lenawee.mi.us/383/Emergency-Services

Attachment 1
July 23, 2025 Meeting Minutes

Meeting Minutes

Date: July 23, 2025

Time: 11am – 12:30pm

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan, Assistant Chief Brian Wilcox, and Firefighter Jeff Jackson.
- Lenawee County Emergency Management Team:
- Chris Foerg – Emergency Regional Planner.
- Craig Tanis – Emergency Management Coordinator.
- RWE Staff: Kevin Cole, Tim Love, and Alannah Woodring.

Topics Discussed: This was a joint meeting with the Lenawee County Emergency Management and Palmyra Fire Department. The Madison County Fire Department was invited but could not attend. Kevin Cole provided an overview of the project site plan and MPSC permitting requirements as well as the draft Emergency Response Plan and Fire Response Plan. An electronic copy of the plans was sent to the agencies on July 24, 2025 for review.

Following are the minutes based on the meeting transcript:

1. Purpose of Meeting

- Provide a safety and technical overview of the proposed Palmyra solar project.
- Establish communication channels between RWE, the Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Review safety protocols, emergency response planning, and project impacts from construction through decommissioning.

2. Project Overview

- Location: Southeastern Michigan, (Palmyra area).
- Current status: ~10% design phase; equipment not yet finalized.
- Site details:
 - ~2,000 acres leased.
 - ~1,234 acres expected inside the fenced project footprint (subject to updates for wetlands/habitat).
- Solar panels: 540–610 watts each, mounted on motorized trackers (25 ft. max height, ~30 in. clearance).
- Electrical system: DC → combiner boxes → inverters → transformers. Stepped up to ~34,500 volts AC before substation interconnection. DC side always energized in presence of light.
- Setbacks & fencing:
 - 50 ft. from roadways.
 - 150 ft. from non-participating property lines.
- Each solar block fully fenced for safety and security.

3. Safety & Emergency Response Procedures

3.1 General Safety

- Situational awareness and controlled communication emphasized.
- Incident Action Plans to be developed for fire, medical, and electrical incidents.

3.2 Fire & Electrical Hazards

- Defensive firefighting approach:
- Electrical fires: allow to self-extinguish.
- Brush/grass fires: water permitted >25 ft. from electrical equipment.

- Acceptable extinguishers: Class C, CO₂, or clean agent.
- Primary risks: vegetation ignition or electrical faults in panels/combiner boxes/inverters.
- No battery storage facility included in this project.

3.3 Access & Coordination

- 24/7 system monitoring via RWE dispatch (Austin, TX). Contact info to be provided to local dispatch.
- Road network: 16-ft wide gravel drives with durable base for heavy vehicles.
- Gates: labeled for mapping and quick emergency access.
- O&M Building: To be co-located near the substation. Equipped with extinguishers, AEDs, staffed by ~4 local permanent employees.
- Emergency support: RWE staff will meet responders at gates. ATVs/UTVs available for patient transport within the field.

4. Vegetation & Fire Prevention

- RWE responsible for mowing/brush clearing inside and outside fences.
- Vegetation kept minimum 8 inches below lowest panel height.
- Roads and fences serve as fire breaks.
- A wildfire risk management plan is under development, factoring in local weather/vegetation growth patterns.

5. Decommissioning & Recycling

- Construction: steel piles driven (not concreted) except at substation. All removable.
- Panels:
- May be resold, donated, or recycled.
- RWE partnered with SolarCycle for panel recycling solutions.
- Life expectancy: ~30 years, with option for 10-year extension.

6. Questions & Concerns Raised

- Drainage systems: Damaged tile drains will be flagged, repaired, and covered under warranty.
- Hazmat risk: Solar panels mainly glass/silica; hazards similar to household fires.
- Accessibility: Firefighters will be met at gates; not expected to locate victims alone.
- Fire suppression: Confirmed defensive-only approach for electrical fires.
- Security: Full fencing prevents trespassing.
- Community impact: RWE committed to supporting fairs, schools, fire departments, and 4H programs.

7. Follow-Up Actions

RWE to provide:

- Dispatch contact details, site maps, and labeled gate IDs.
- Annual Tier II hazardous materials reports and updated emergency contact lists.
- Joint training and site orientation to be scheduled prior to commissioning.
- Facility tours: possible during “Golden Row” construction phase and before operations begin.
- Emergency response plan will be collaboratively developed with the Palmyra Fire Department and Lenawee County Emergency Management Team and refreshed annually.

8. Closing

- Meeting built stronger relationships between RWE, Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Emphasis on safety-first operations, defensive firefighting posture, and transparent communication.
- Contact information exchanged; ongoing updates and training commitments reaffirmed.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment. Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Insert PDF – Email to Paul 7/24/25 with ERP and FRP

Date: August 6, 2025

Time: 12:57 pm via text message via text message

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan,
- RWE Staff: Kevin Cole

Topics Discussed: Paul stated that he had no comments/edits for the ERP or FRP at this time. Paul will reach out if a question or need arises.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment. Edits will be incorporated into the FRP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Palmyra Fire Department

July 23, 2025: Meeting Minutes

July 24, 2025: Email Correspondence

August 6, 2025: Consultation Log

December 18, 2025: Email Correspondence and Attachments

Meeting Minutes

Date: July 23, 2025

Time: 11am – 12:30pm

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan, Assistant Chief Brian Wilcox, and Firefighter Jeff Jackson.
- Lenawee County Emergency Management Team:
- Chris Foerg – Emergency Regional Planner.
- Craig Tanis – Emergency Management Coordinator.
- Local Landowners: Several present and engaged with questions.
- RWE Staff: Kevin Cole, Tim Love, and supporting personnel.

Topics Discussed: This was a joint meeting with the Lenawee County Emergency Management and Palmyra Fire Department. The Madison County Fire Department was invited but could not attend. Kevin Cole provided an overview of the project site plan and MPSC permitting requirements as well as the draft Emergency Response Plan and Fire Response Plan. An electronic copy of the plans was sent to the agencies on July 24, 2025 for review.

Following are the minutes based on the meeting transcript:

1. Purpose of Meeting

- Provide a safety and technical overview of the proposed Palmyra solar project.
- Establish communication channels between RWE, the Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Review safety protocols, emergency response planning, and project impacts from construction through decommissioning.

2. Project Overview

- Location: Southeastern Michigan, (Palmyra area).
- Current status: ~10% design phase; equipment not yet finalized.
- Site details:
 - ~2,000 acres leased.
 - ~1,234 acres expected inside the fenced project footprint (subject to reduction for wetlands/habitat).
- Solar panels: 540–610 watts each, mounted on motorized trackers (25 ft. max height, ~30 in. clearance).

- Electrical system: DC → combiner boxes → inverters → transformers. Stepped up to ~34,500 volts AC before substation interconnection. DC side always energized in presence of light.
- Setbacks & fencing:
 - 50 ft. from roadways.
 - 150 ft. from non-participating property lines.
- Each solar block fully fenced for safety and security.

3. Safety & Emergency Response Procedures

3.1 General Safety

- Situational awareness and controlled communication emphasized.
- Incident Action Plans to be developed for fire, medical, and electrical incidents.

3.2 Fire & Electrical Hazards

- Defensive firefighting approach:
- Electrical fires: allow to self-extinguish.
- Brush/grass fires: water permitted >25 ft. from electrical equipment.
- Acceptable extinguishers: Class C, CO₂, or clean agent.
- Primary risks: vegetation ignition or electrical faults in panels/combiner boxes/inverters.
- No battery storage facility included in this project.

3.3 Access & Coordination

- 24/7 system monitoring via RWE dispatch (Austin, TX). Contact info to be provided to local dispatch.
- Road network: 16-ft wide gravel drives with durable base for heavy vehicles.
- Gates: labeled for mapping and quick emergency access.
- O&M Building: To be co-located near the substation. Equipped with extinguishers, AEDs, staffed by ~4 local permanent employees.
- Emergency support: RWE staff will meet responders at gates. ATVs/UTVs available for patient transport within the field.

4. Vegetation & Fire Prevention

- RWE responsible for mowing/brush clearing inside and outside fences.
- Vegetation kept minimum 8 inches below lowest panel height.
- Roads and fences serve as fire breaks.

- A wildfire risk management plan is under development, factoring in local weather/vegetation growth patterns.

5. Decommissioning & Recycling

- Construction: steel piles driven (not concreted) except at substation. All removable.
- Panels:
- May be resold, donated, or recycled.
- RWE partnered with SolarCycle for panel recycling solutions.
- Life expectancy: ~30 years, with option for 10-year extension.

6. Questions & Concerns Raised

- Drainage systems: Damaged tile drains will be flagged, repaired, and covered under warranty.
- Hazmat risk: Solar panels mainly glass/silica; hazards similar to household fires.
- Accessibility: Firefighters will be met at gates; not expected to locate victims alone.
- Fire suppression: Confirmed defensive-only approach for electrical fires.
- Security: Full fencing prevents trespassing.
- Community impact: RWE committed to supporting fairs, schools, fire departments, and 4H programs.

7. Follow-Up Actions

RWE to provide:

- Dispatch contact details, site maps, and labeled gate IDs.
- Annual Tier II hazardous materials reports and updated emergency contact lists.
- Joint training and site orientation to be scheduled prior to commissioning.
- Facility tours: possible during “Golden Row” construction phase and before operations begin.
- Emergency response plan will be collaboratively developed with the Palmyra Fire Department and Lenawee County Emergency Management Team and refreshed annually.

8. Closing

- Meeting built stronger relationships between RWE, Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Emphasis on safety-first operations, defensive firefighting posture, and transparent communication.

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From: [Cole, J Kevin](#)
To: prohlan@gmail.com
Cc: [Carol Mcknight](#)
Subject: Rouget Road Solar - Emergency Response Plan and Fire Response Plan for Review
Date: Thursday, July 24, 2025 10:15:47 AM
Attachments: [20250718_FINAL_RRS_Emergency_Response_Plan.pdf](#)
[20250717_FINAL_RRS_Fire_Response_Plan.pdf](#)

Hi Paul,

If you would take a look at the attached files and give me any comments or suggestions, I would appreciate it.

Best,
Kevin

J. Kevin Cole
Development Manager

RWE Clean Energy
Mobile : 517-745-7546
353 N Clark St, 30th Floor, Chicago, IL 60654
Jkevin.cole@rwe.com

Date: August 6, 2025

Time: 12:57 pm via text message via text message

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan,
- RWE Staff: Kevin Cole

Topics Discussed: Paul stated that he had no comments/edits for the ERP or FRP at this time. Paul will reach out if a question or need arises.

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From: Cole, J Kevin <JKevin.Cole@rwe.com>
Sent: Thursday, December 18, 2025 1:49 PM
To: prohlan@gmail.com
Cc: Carol Mcknight; Aleyda Galan
Subject: Rouget Road Solar Project - MPSC Filing and Finalize ERP & FRP
Attachments: 20251203_Exhibi A-1.9 Report - V - FINAL.pdf; 20251203_RRS_Exh-A-1.10_FRP_FINAL_pdf.pdf

Hi Chief Hohlan,

I hope all is well.

I wanted to inform you that we have submitted our application to the Michigan Public Service Commission for the Rouget Road Solar project.

As part of the filing, we've finalized our Emergency Response Plan and Fire Response Plan—both are attached for your reference.

I'll be reaching out again as the project moves forward to ensure continued coordination. In the meantime, please don't hesitate to contact me at any time if you have questions or would like additional information.

Appreciate your time and support.

Best regards,
Kevin

J. Kevin Cole
Development Manager

RWE Clean Energy
Mobile : 517-745-7546
353 N Clark St, 30th Floor, Chicago, IL 60654
Jkevin.cole@rwe.com

Rouget Road Solar Farm

Exhibit A-1.9: Emergency Response Plan

Lenawee County, Michigan

DECEMBER 2025

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

EMERGENCY RESPONSE PLAN FOR THE ROUGET ROAD SOLAR PROJECT, LENAWEE COUNTY, MICHIGAN

Prepared for

Rouget Road Solar Farm, LLC
353 North Clark Street
Suite 3000
Chicago, Illinois 60654

Prepared by

SWCA Environmental Consultants

200 W 22nd Street, Suite 220
Lombard, Illinois 60148
www.swca.com

SWCA Project No.
78878

December 2025

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Attachment 1: July 23, 2025 Meeting Discussion

1 INTRODUCTION

This Emergency Response Plan (“ERP”) provides guidance to construction and field personnel on measures identified by Rouget Road Solar Farm, LLC (“Rouget Road Solar”) to mitigate risks of hazards associated with the proposed Rouget Road Solar Project (“Project”) in Lenawee County, Michigan. This ERP complies with requirements established under the Michigan Public Service Commission (“MPSC”) Public Act 233 (Public Act 233) and integrates standards from the Occupational Safety and Health Administration (“OSHA”), and relevant local fire safety and emergency codes.

1.1 Local Consultation

This plan has been developed in coordination with emergency response providers, which consists of Lenawee County Emergency Management, the Palmyra and Madison Fire Departments, and the Lenawee County Sheriff’s Office, in accordance with OSHA standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. It will be the responsibility of Rouget Road Solar and its Project contractors to comply with the measures identified in this plan. Rouget Road Solar met with the Lenawee County EMS and Palmyra Fire Department on July 23, 2025 to discuss the Rouget Road Solar Farm Project and ERP. Rouget Road Solar commits to reviewing and updating this ERP with local fire departments, first responders, and the County Emergency Manager at least once every three (3) years and after material design/equipment changes, with documented re-consultation. Additional details on coordination with County Emergency Services can be found in Attachment 1.

Updates to the Project’s ERP may occur based on continued coordination between Rouget Road Solar and local agencies.

1.2 Project Description, Location, and Access

The Rouget Road Solar Farm Project is a proposed 175-megawatt (“MW”) alternating current (“AC”) solar photovoltaic power generating facility. The project would be in Lenawee County, Michigan southeast of the city of Adrian. The Project Boundary/Leased Parcels is approximately 2,133 acres of predominantly agricultural land (Figure 1). Once built, the fenced-in portion of the Project would be approximately 1,042 acres. The project would provide renewable energy to the electrical transmission grid. Major components of the project include photovoltaic solar arrays (the main project footprint), an on-site substation, switchyard, an operation and maintenance (“O&M”) area, transmission line, roads, and fences.

The Project area and adjacent properties primarily consist of agricultural or residential land. State Highway 223 runs east to west through the center of the Project area (Figure 2). CR Myers Highway runs north to south through the center of the Project (see Figure 2).

Police, fire, ambulance, and emergency vehicles will access the Project primarily via State Highway 223 (see Figure 2). The Project is expected to provide electric power to the existing electric transmission grid through a new interconnection to the existing transmission lines running east to west in the northern portion of the Project area.

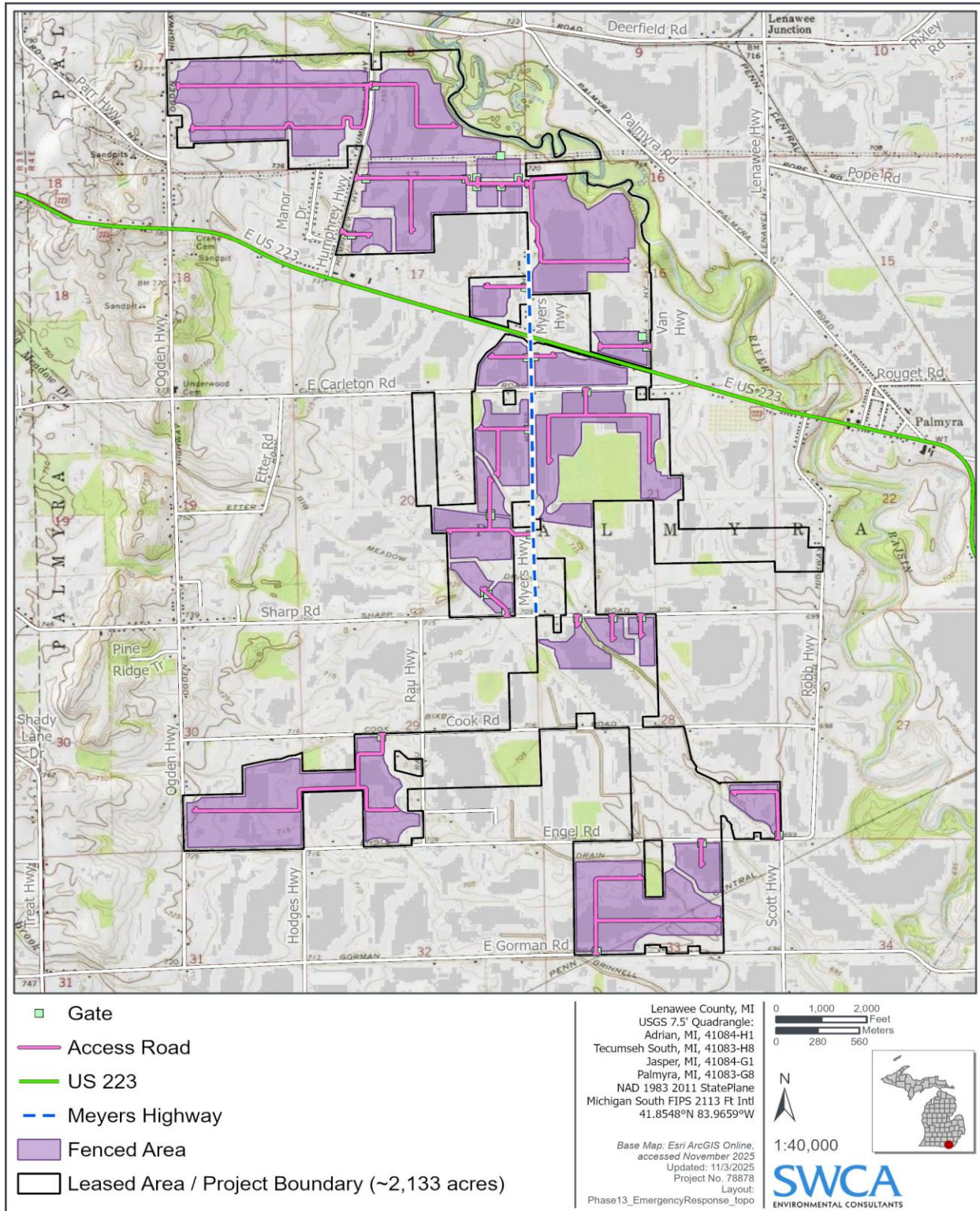


Figure 1. Topography of the Rouget Road Solar Farm Project.

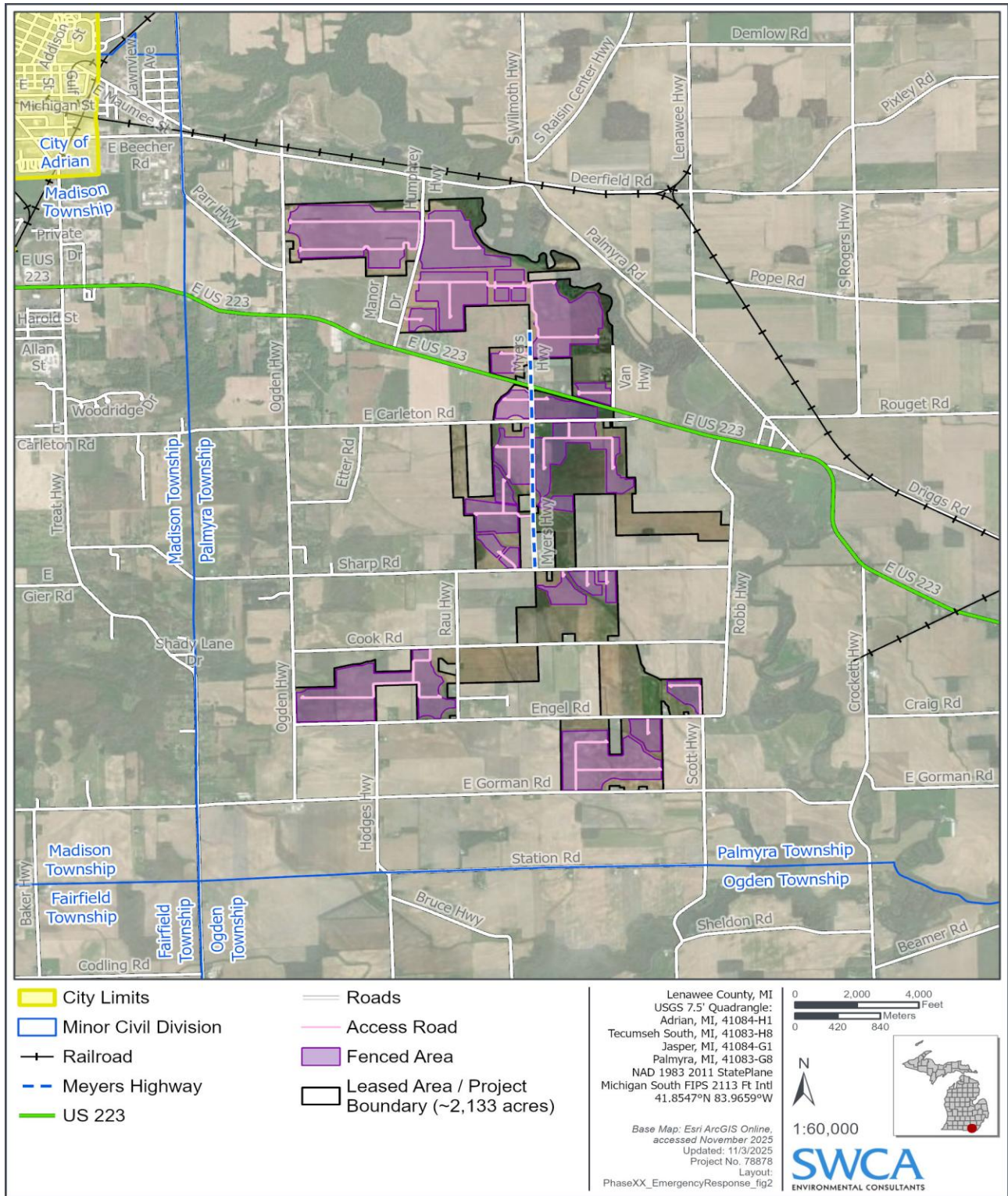


Figure 2. Rouget Road Solar Farm Project site location.

1.3 Plan Review and Development

This ERP will be reviewed and amended if there is a change in facility design, construction, operation, or maintenance that affects emergency action planning. This ERP will be reviewed at least annually internally and at least once every three (3) years with local fire, EMS, and County Emergency Management; revised plans will be circulated to those agencies.

1.4 Training

Employees or contractors visiting the Project area will have access to and receive training on this ERP whenever it is modified or at least on an annual basis. Employees will also be trained when this ERP is initially implemented. Contractors and visitors who enter operating areas of the Project area will be trained on evacuation procedures before they enter for the first time and at least annually thereafter. Evacuation drills will be conducted by the Facility Manager at least twice a year. A list of contractors with current training on this ERP will be maintained at the construction trailer during construction and at the O&M building, once built, for reference purposes. Employees and contractors will be provided with and use the required personal protection equipment (“PPE”) based on the expected hazards of their work.

See Exhibit A-1.10 Fire Response Plan for site-specific training commitments (pre-operation and upon request) with local responders.

1.4.1 Local Capacity Analysis

Rouget Road Solar is not currently aware of either deficiencies in existing local emergency response capacity or deficiencies in specific equipment or training for local emergency response capacity. Rouget Road Solar and the local emergency response team will meet prior to the Rouget Road Solar Project going operational to review Palmyra Fire Department equipment, Lenawee EMS capabilities, and other services to identify potential gaps in capacity, training, equipment, and level of staff. If gaps are identified, Rouget Road Solar will work with local emergency officials to find solutions and schedule any additional drills or training identified. Also, during this meeting, Rouget Road Solar will provide points of contact, gate keys/codes, and finalized maps/layouts of the facility as part of this emergency response plan.

2 CONTINGENCY EMERGENCY RESPONSE PLANS

The following contingencies represent conditions that pose a potential safety, health, or security risk to personnel, visitors, or the surrounding community. These events require clear response protocols, trained staff, and strong coordination with local emergency services. The procedures below outline the actions to be taken to protect life, stabilize the incident, and secure the Rouget Road Solar Farm facility.

2.1 Electrical Hazards

Access to locations containing energized electrical equipment will be restricted at all times. Warning signage compliant with the National Electric Code (“NEC”) will be posted to prevent unauthorized entry. In the event of an electrical hazard, only qualified electrical personnel will respond. These personnel will utilize appropriate PPE, including arc-rated clothing, insulated gloves, and voltage-rated tools.

If energized equipment becomes damaged or presents an imminent hazard, responders will isolate and de-energize the affected equipment following the facility’s lockout/tagout (“LOTO”) protocols. The area will be secured until the hazard is mitigated. Personnel within the immediate hazard area will evacuate to a

designated safe zone, with distancing requirements determined by the Site Manager based on equipment type and voltage class.

2.2 Severe Weather Events

During construction and operations, the EPC Contractor and O&M team will continuously monitor National Weather Service (“NWS”) alerts and local forecasting tools. When severe weather may affect the site, real-time notifications will be issued to personnel.

During periods of high fire danger, potential sources of fire ignition (e.g., vehicle exhaust systems, cigarettes, matches, propane torches, sparks from hot work operations, etc.) must be used with extra caution. During periods of thunderstorms, personnel will remain alert to heavy rainfall in the area. Notifications of flooding or flash floods will trigger suspension of field work, and personnel will be directed to predesignated shelters. High winds or tornado warnings will trigger suspension of elevated work and securing of loose materials. Lightning or thunderstorm activity will activate shelter-in-place protocols, with personnel directed to predesignated indoor shelters, including the O&M building. Snow, ice, or hail events will prompt cessation of field activities and inspection of access roads and equipment. Work will not resume until conditions are deemed safe by the Site Manager.

Following any severe weather event, facility equipment will be evaluated for damage by the SSO, and repairs will be performed under standard operational procedures.

2.2.1 Wildfires

Wildfires are uncontrolled fires that burn in wildland vegetation, often in rural areas. Wildfires can ignite from natural occurrences and human-generated sources. They may begin unnoticed, spread quickly, and are often signaled by dense smoke that may be visible for miles. A combination of weather conditions, fuel availability, topography, temperatures, and rainfall often determine the severity and growth of wildfires. Drought conditions contribute to the likelihood of wildfire outbreaks, particularly in the summer months. In the event of a wildfire, the following procedures will apply: Remain alert to signs of wildfire in your immediate area and maintain awareness of changes in the direction of wind or smoke.

- Determine the relative location and size of the fire and take immediate action, as appropriate.
- Alert the Facility Manager.
- Follow the emergency response protocol.
- Evacuate and/or go to the designated assembly area.
- Protect yourself from smoke. Cover your nose and mouth with a face mask, cloth, buff, or scarf. If in a vehicle, roll-up windows and close air vents. Drive slowly with headlights on. Watch for other vehicles and pedestrians. Do not drive through areas of heavy smoke.
- Stay tuned to local news, emergency alert systems, weather forecasts, and updates for the latest statements, watches, and warnings.
- Do not try to outrun the fire; wildfires can move at speeds of up to 20 miles per hour.
- Do not re-enter the site until given approval by the Facility Manager.

2.2.2 Flooding and Flash Flood

Flash flooding is the result of heavy localized rainfall, such as that from slow moving, intense thunderstorms. A flash flood often results from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water that rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30 minutes to 6 hours of a heavy rain event. In hilly terrain, flash floods can strike with little to no advance warning. Distant rain may be channeled into gullies and ravines, causing flash flooding in minutes. In the event of a flash flood, the following procedures shall apply:

- During periods of thunderstorms, remain alert to heavy rains in your immediate area or upstream from your location. It does not have to be raining at your location for flash flooding to occur.
- Do not drive through flooded areas, even if it looks shallow enough to cross.
- Do not cross flowing streams on foot where water is above your ankles.
- Be especially cautious at night. It is harder to recognize water danger in the dark.
- Do not attempt to outrace a flood on foot. If you see or hear it coming, move to higher ground immediately.
- Be familiar with the land features where you work. The site may be in a low area, near a drainage ditch, or small stream.
- Stay tuned to weather forecasts and updates for the latest statements, watches, and warnings concerning heavy rain and flash flooding.
- Wait 15 to 30 minutes, or until high water recedes.

2.2.3 Tornado

Upon the issuance of a tornado warning, site personnel will evacuate the site and report to the pre-designated shelter area. In the event site personnel are outside and unable to evacuate to the shelter, the following procedures will be followed:

- Lie flat in a nearby ditch or depression and cover the head with the hands. Be aware of the potential for flooding.
- It is safest to leave a vehicle for safe shelter.
- Beware of flying debris.

2.2.4 Lightning Storm

In the event a lightning storm is within 10 to 30 miles and is approaching the Project area, the following procedures will apply:

- Notify the SSO and on-site employees.
- If lightning approaches within 5 miles, stop work and get in and stay in company or personal vehicles that have rubber tires.

Remain in vehicles for at least 30 minutes depending on passing storm severity and wait for an OK from the SSO in charge for monitoring the storm.

Lightning can be a source of fire in the Project area and the surrounding area. Areas of lightning strike should be monitored for signs of ignition.

2.2.5 Snowstorm

Before winter approaches, the SSO will ensure adequate supplies, including the following:

- Sand to improve traction.
- Snow shovels and other snow removal equipment.
- As needed, service agreement(s) with snow removal vendors.

When winter weather threats exist, the SSO will monitor local news channels for critical information from the National Weather Service to stay alert to changing weather conditions. Winter storm watches, warnings, and advisories are issued by local National Weather Service Forecast Offices.

Extreme and fluctuating weather conditions, including high humidity, freezing temperatures, and ice storms, can cause ice to form on power lines. Ice weight can put a lot of stress on power lines and damage equipment. Snow, rain, or freezing rain can also create conditions to start pole fires. In the event of damaged poles or ice on power lines, the SSO will notify the site owner. If site personnel notice excessive ice buildup on a section of lines or downed lines, they will notify the SSO and take the following precautions:

- Stay clear of low or sagging lines and remember that traveling under these lines can be dangerous.
- Treat a downed line as though it is energized and keep other personnel away.
- Do not get out of your vehicle if the vehicle accidentally comes into contact with a downed line. If it is safe to do so, back slowly away from the line or wait for help to arrive.

Depending on the severity of the winter storm, the site may be closed.

2.3 Physical Security Breaches

If unauthorized access, vandalism, or any suspected security breach occurs, security alarms will activate, and local law enforcement will be contacted immediately. Site entry points will be secured until the threat is resolved.

Following the incident, the Site Manager will coordinate with law enforcement to inspect for property damage, missing equipment, and safety impacts. Personnel located near the affected area may be relocated to designated safe zones if the breach presents a credible risk to health or safety.

2.4 Cybersecurity Breaches

For any suspected cybersecurity compromise affecting operational systems or data infrastructure, personnel will immediately notify the designated IT security contact. Access to impacted systems will be restricted, and internal monitoring protocols will be applied to prevent escalation.

If operational control systems are affected, the Project will transition to manual oversight procedures until system integrity is restored. Staff will be instructed not to access or use compromised systems, and all communications will follow internal cybersecurity incident procedures. The Project's IT and cybersecurity teams will lead the investigation and remediation.

2.5 Mechanical Failures

When mechanical equipment malfunctions or presents a safety risk, work in the affected area will be stopped immediately. The area will be isolated until maintenance personnel assess and repair equipment. Routine inspections and preventative maintenance programs reduce the likelihood of mechanical failures.

If a mechanical failure creates a risk of injury (e.g., moving parts, stored energy, structural instability), personnel will evacuate the hazard zone. The evacuation radius will be determined by the Site Manager based on equipment characteristics and failure severity.

2.6 Chemical Spills

Chemical spill response will follow established spill-prevention and spill-control procedures. Inverters and transformers may contain insulating oils, and spill kits will be staged at strategic locations throughout the site.

In the event of a spill, personnel will isolate the area, deploy absorbent materials or contaminant booms, and notify trained spill-response staff. Depending on spill volume and material type, the Site Manager may initiate evacuation from the immediate vicinity. Larger spills or those posing a potential off-site impact will trigger notification to environmental emergency services and the Michigan EGLE Pollution Emergency Alerting System (“PEAS”).

2.7 Personnel Injuries and Serious Health Conditions

If a medical emergency occurs, onsite personnel will immediately call 911. Personnel trained in first aid or CPR may provide care if conditions allow. Emergency responders will be escorted directly to the incident location.

All workers and visitors will be briefed on emergency medical procedures, including locations of first aid kits, AEDs (if installed), and emergency contacts. Serious injuries will be documented and reported to OSHA or other required entities. Minor injuries will be directed to appropriate off-site medical treatment facilities.

To prepare for these contingencies, all operating personnel, and as many other on-site personnel as possible, will be trained in Cardiopulmonary Resuscitation (“CPR”), bloodborne pathogen awareness, and the use of an Automated External Defibrillator (“AED”). AEDs will be located in clearly marked and accessible areas known to all staff. Each site will also maintain at least one fully stocked first-aid kit in the control house and one in each site vehicle; these kits will be inspected at least monthly. The nearest approved non-emergency medical facility and occupational nurse contact information will be posted on site, although emergency responders will determine the final destination for emergency care.

If present, AEDs will be inspected every 90 days (or per manufacturer recommendations) and tested at least once every six months. Records of inspections, testing, and employee training will be maintained, and employees will receive annual notification and refresher training on the location and use of the AED.

Basic First Response Actions

Personnel discovering an injured or unresponsive individual should:

- Check for responsiveness and breathing;

- If the individual is unresponsive, immediately call 9-1-1 and direct another person to retrieve the AED;
- Assess airway and breathing; clear visible obstructions if present;
- If not breathing and no pulse is detected, begin CPR and continue until the AED is available;
- Once the AED arrives, follow all device prompts while continuing CPR (if applicable) until medical personnel arrive.

If the victim is conscious but severely injured or in visible shock, call 9-1-1 immediately. Do not attempt to move the individual unless remaining in place would create additional danger. Keep the victim still, control any profuse bleeding with direct pressure, immobilize injured limbs, and provide reassurance until emergency responders arrive.

Special Considerations

- **Electric Shock:** If electricity is involved, turn off the power source if possible and safely remove the victim from contact using non-conductive material. Begin CPR/AED only after the victim is no longer in contact with the electrical source.
- **Burns:** Cool the affected area, remove restrictive jewelry if safe, and never apply ointment or remove adhering clothing. Seek professional medical assistance promptly.
- **Heat Stroke / Heat Exhaustion:** Move the victim to a cool environment, begin active cooling (water/fanning), and elevate feet if the individual shows signs of heat exhaustion or shock. Rapid cooling is critical in cases of heat stroke and can be lifesaving.

2.8 Capacity or Transmission Emergencies

In the event of a grid disturbance, transmission fault, or utility-initiated emergency, Rouget Road Solar personnel will coordinate immediately with the interconnecting utility. Operational curtailment or shutdown may be required to stabilize the system.

If an emergency originates onsite – such as a transformer fault or relay malfunction – qualified personnel will isolate and secure the affected equipment. All actions will adhere to the Project’s electrical safety procedures and utility coordination protocols.

2.9 Traffic Incidents

If a traffic incident occurs involving construction or operations vehicles, the affected area will be secured, and emergency services contacted if injuries or hazards are present. Workers will be instructed to avoid the area until cleared.

All vehicle operators will adhere to designated haul routes, onsite speed limits, and safe driving practices. Spotters or flaggers will support heavy equipment movement, low-visibility conditions, or delivery activities. Traffic incidents will be reported to the Site Manager and law enforcement as needed.

3 EVACUATION PROCEDURES

Evacuation procedures are implemented when hazards present a risk to personnel safety or require movement to designated muster areas. During significant emergency situations at or near the Project area, the Facility Manager, in consultation with law and/or fire authorities, may issue an evacuation notice. When an evacuation has been called, on-site employees will gather at the designated assembly area. The Facility Manager will account for personnel. Once employees are accounted for, they will safely travel from the Project area to safe zone, which are generally areas off-site away from the threat. Supervisors and the SSO will perform a sweep of the facility to locate persons and reconvene at the designated assembly area. Once personnel are accounted for, they will exit the site.

All evacuation routes and muster point maps will be posted throughout the facility and reviewed during the safety orientations. The primary evacuation routes will be west on State Highway 233 (see Figure 3).

3.1 Electrical Hazards

Electrical hazards generally do not require full-site evacuation. However, personnel within the immediate hazard zone will evacuate to a designated safe area. Evacuation distances will reflect voltage class, equipment type, and Site Manager judgement.

3.2 Severe Weather Events

During severe weather, personnel will move to designated indoor shelter locations. If an evacuation is required, predetermined egress routes will be used unless conditions render them unsafe, in which case alternate muster points may be established. Personnel accountability will be confirmed at muster points through sign-in logs.

3.3 Physical Security Breaches

Security breaches typically require localized relocation rather than full-site evacuation. Personnel in proximity to the incident may be moved to secure locations at the discretion of the Site Manager.

3.4 Cybersecurity Breaches

Cybersecurity incidents do not require physical evacuation.

3.5 Mechanical Failures

Mechanical failures may warrant localized evacuation if the malfunction presents a risk of injury. Evacuation distances will be established based on equipment characteristics and operational risks.

3.6 Chemical Spills

Chemical spills generally require evacuation only from the immediate area. Evacuation boundaries will be established by the Site Manager based on spill volume, material type, and risk of ignition or exposure.

3.7 Personnel & Visitor Medical Emergencies

Evacuation procedures focus on providing EMS responders with clear access to the incident location while relocating uninvolved personnel away from the area.

3.8 Capacity or Transmission Emergencies

These events do not typically require evacuation unless electrical hazards or equipment failures create a localized safety risk.

3.9 Traffic Incidents

Traffic incidents do not require full-site evacuation. Personnel will avoid the affected area until cleared.

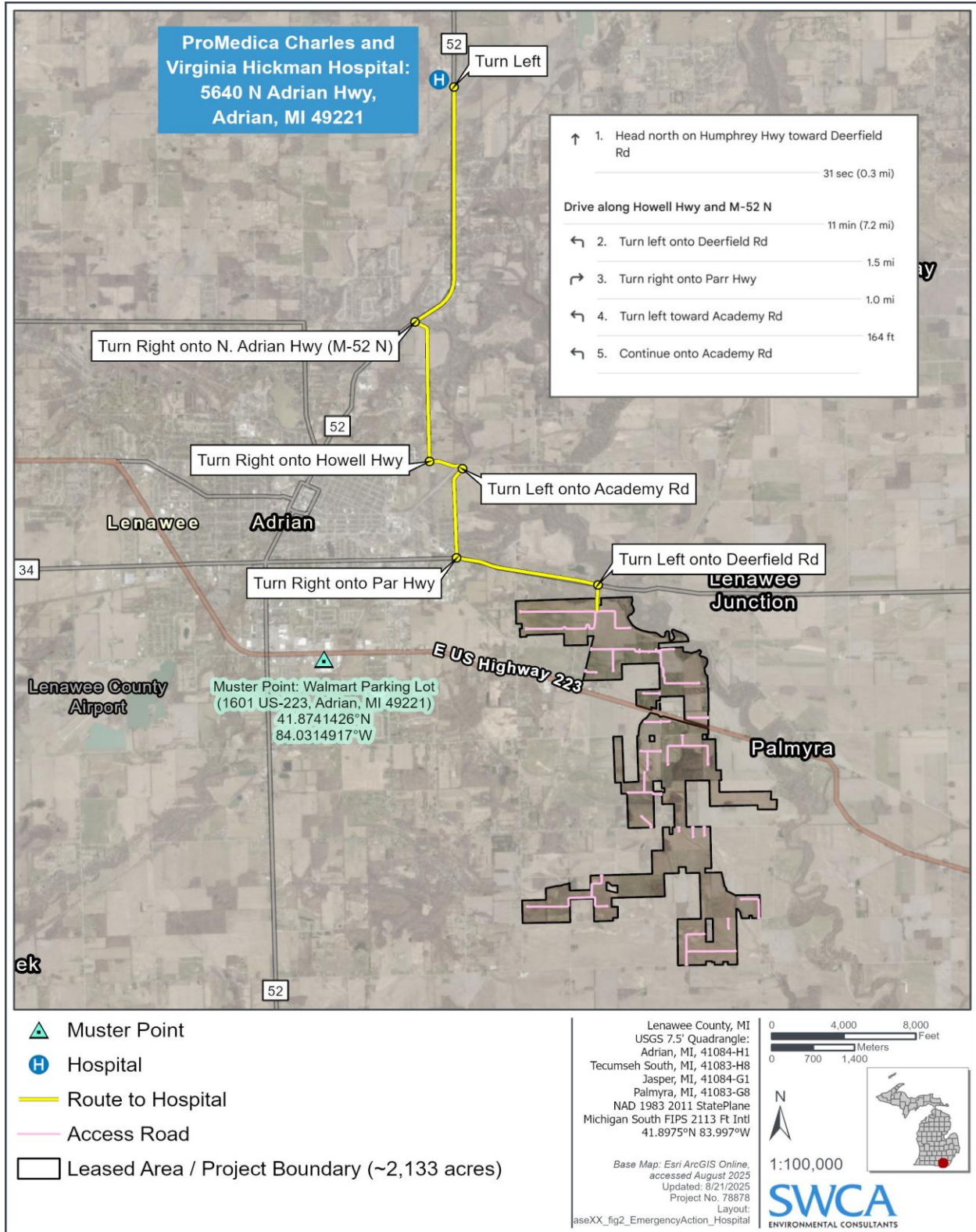


Figure 3. Fire and ambulance response access and route from Project site to Hospital, Emergency Evacuation and Muster Area.

4 CONTINGENCY COMMUNICATION AND COMMUNITY NOTIFICATION

In accordance with AFIP §7.9(a)(5) and the MPSC, the Facility Manager shall ensure that timely and accurate notifications are made to community members and emergency response partners in the event of any contingency that could pose a risk to public health, safety, or the environment.

The Facility Manager, in coordination with Lenawee County Emergency Management, the Palmyra Township Fire Department, and other responding agencies, will utilize the County's emergency alerting systems (e.g., CodeRED, Nixle), local radio and television, and the Project website to provide emergency information to the public.

The following table outlines the community notification procedures by contingency, identifying notification triggers, required actions, dissemination methods, and responsible personnel.

Table 1: Community Notification Procedures by Contingency

Contingency Event	Notification Trigger	Primary Notification Actions	Dissemination Channels	Responsible Personnel
Electrical Hazard (e.g., downed line, energized fence, transformer fire)	Discovery of downed or damaged high-voltage equipment	Call 911 and project electrical contractor; isolate area and notify adjacent landowners if hazard extends offsite.	County emergency alert system (if warranted), Project website update	Facility Manager; Electrical Safety Officer
Severe Weather (e.g., tornado, high winds, flood)	National Weather Service (NWS) warnings or local emergency alerts that would pose a threat to the facility that could be harmful to the community	Notify all onsite personnel and suspend onsite operations; coordinate with Lenawee County Emergency Management for public alert issuance.	County CodeRED/Nixle alert systems, local radio, Project website update	Facility Manager; County Emergency Management Director
Physical Security Breaches (e.g., trespass, vandalism, bomb threat)	Confirmation or credible report of threat	Contact law enforcement and activate site lockdown procedures; notify adjacent landowners if safety risk is possible.	County alert system (if warranted), local media release coordinated with law enforcement	Facility Manager; Lenawee County Sheriff's Office
Cyber Security Breaches	Discovery of cyber breach that results in operational disruption or potential safety impacts	Local emergency management and law enforcement will be notified.	County alert system (if warranted), local media release coordinated with law enforcement, Project website update.	Facility Manager; County Emergency Management Director, Lenawee County Sheriff's Office
Mechanical Failures	Discovery of failures that could impact community, such as noise or debris	Local emergency management	County alert system (if warranted), local radio, Project website update.	Facility Manager; County Emergency Management Director
Chemical Spill or Hazardous Release	Release of fuel, oil, or hazardous material exceeding reportable quantities	Notify 911 and Michigan EGLE Pollution Emergency Alerting System (PEAS); initiate containment; notify public if offsite migration possible.	County CodeRED/Nixle alert, local radio, Project website update	Facility Manager; Environmental Health Officer; County Emergency Management
Medical Emergency or Fatality	Serious injury, or fatality onsite	Call 911, provide immediate aid, and secure scene; notify corporate Health and Safety and County emergency personnel.	Direct coordination with EMS and fire personnel (no public alert unless community exposure risk)	Facility Manager; Onsite Safety Lead

Contingency Event	Notification Trigger	Primary Notification Actions	Dissemination Channels	Responsible Personnel
Electrical Hazard (e.g., downed line, energized fence, transformer fire)	Discovery of downed or damaged high-voltage equipment	Call 911 and project electrical contractor; isolate area and notify adjacent landowners if hazard extends offsite.	County emergency alert system (if warranted), Project website update	Facility Manager; Electrical Safety Officer
Capacity or Transmission Emergencies	Event that could result in service disruption or pose public safety risk	Local emergency management	County alert system (if warranted), local radio, Project website update.	Facility Manager; County Emergency Management Director
Traffic Incidents	Incidents that impact public roadways or access	Law enforcement and local emergency management will be notified.	County alert system (if warranted), local radio	Facility Manager; County Emergency Management Director, Lenawee County Sheriff's Office

4.1 Incident Reporting

Prompt and accurate reporting and investigation of work-related incidents, which include injuries, illnesses, and near misses, or accidents that could have caused serious injuries, are necessary components of effective accident prevention programs. This information can be used in evaluating and preventing hazards, fulfilling mandatory recordkeeping requirements, and filing for workers' compensation benefits. Incidents resulting in personal injury and/or illness require that the appropriate Office of Worker's Compensation Programs and Department of Labor procedures are followed, and forms are completed.

The Facility Manager is the primary point of contact for planned and unplanned outages. The Facility Manager will notify required parties, including the operation centers of utilities and asset management/owners, and field personnel via email for organized record keeping. Field personnel will be copied for informational purposes and seamless communication. Communication will be directed toward the Facility Manager unless the Facility Manager defers to a specific field supervisor/technician. The same protocol will be followed for reporting updates, including the root cause of an outage.

Emergencies, especially ones that involve property damage, will be reported as soon as possible to the Facility Manager. This includes both O&M personnel and temporary construction personnel during the construction and decommissioning phases. The Facility Manager will notify personnel of the situation and request dispatch, which may include requesting photographs that document the damage. Each facility or work area will maintain their own recordkeeping forms for injuries/illnesses.

4.2 Emergency Notification Procedures

An emergency at or near the Project area will trigger the emergency notification procedures identified in this section. The first call should be to 911 so that appropriate authorities can be notified and appropriate apparatus and personnel dispatched. Travel times to the Project area require notification of 911 as early as possible after a fire or other emergency has been observed. Emergency reporting is critical for tracking where, when, how, and why fire ignitions or other emergencies occur and will help the fire agencies develop protocols for reducing their occurrence.

A list of personnel who will be the primary points of contact to be notified during a fire emergency will be provided by the general contractor during construction and decommissioning, and by the O&M services contractor during operation. Personnel contact information will include on-site Project team members and additional on-site personnel.

4.3 Evacuation Communication Protocol

If field personnel must travel out of the immediate area to seek refuge and/or may lose the ability to access the site's Supervisory Control and Data Acquisition system (loss of power, cell service, or internet), the Facility Manager will hand off the primary point of contact and site operator role to the Remote Operation Center.

4.4 Post-Incident Public Communication

Following any incident that triggers public notification, the Facility Manager and Rouget Road Solar Farm corporate communications team will prepare a post-incident summary for distribution to local emergency management, Township officials, and the public. This will include a description of the event, response actions taken, and measures implemented to prevent recurrence.

5 EMERGENCY RESPONSE PROCEDURES

This ERP applies only to emergency actions to be taken in the Project area. After an evacuation, personnel will be governed by emergency plans of their respective agencies and/or local government authorities.

In reporting fires and other emergencies, the first call should be to 911 so that the appropriate apparatus can be dispatched. To facilitate the arrival of fire services during construction, an emergency response meeting point will be established. The SSO or designee will meet the emergency response team to lead them into the Project area.

5.1 Roles and Responsibilities

Employees should know how to prevent and respond to fires and are responsible for adhering to company policy regarding fire emergencies. The following sections detail general responsibilities by position.

5.2 Project Owner/Management

The Project owners/management are responsible for implementing necessary measures to reduce fire risk and comply with federal, state, and local fire safety/protection policies. Additionally, Project owners/management are responsible for making necessary training and equipment available to provide a safe working environment for employees and contractors.

5.3 Facility Manager

The Facility Manager will be responsible for the following:

- Directing occupants to the prescribed evacuation routes and notifying the Remote Operation Center of actions and updates.
- Ensuring that personnel know the evacuation procedures.
- Directing an orderly flow of personnel during drills and actual emergencies and reporting to the Remote Operation Center when their site has been evacuated completely.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

5.4 Remote Operation Center

The Remote Operation Center will be responsible for the following:

- Initiating action deemed necessary by the Facility Manager in an emergency.
- Ensuring that information notices are issued to field personnel, the owner representative, and asset managers.

5.5 Site Safety Officer

The SSO will manage the ERP for the Project and will maintain records pertaining to the ERP. The SSO is also responsible for the following:

- Understanding the ERP and its mandates for training, fire prevention, fire suppression, and evacuation.
- Understanding the risk associated with the Project and with activities that will occur within the Project area.
- Developing and administering the risk prevention and safety training program.
- Ensuring that fire control equipment and systems are properly maintained and in good working condition.
- Monitoring combustibles on-site and managing where they are stored.
- Conducting safety surveys and making recommendations to the site manager.
- Stopping Project work activities that pose a hazard or are not in compliance with this ERP.
- Reporting fires ignited in the Project area—whether structural, vegetation, electrical, or other—to the fire department.

5.6 Supervisors

Supervisors are responsible for the following:

- Ensuring that employees receive appropriate fire safety training.
- Notifying the SSO when changes in operation increase the risk of fire.
- Enforcing fire prevention and protection policies.
- Accounting for employees/contractors in the case of an evacuation.
- Performing Project area sweeps to round up staff in the case of an evacuation.
- Facilitating fire agency access to the Project area.
- Cooperating with the fire agencies during and after fires.
- Identifying unsafe work practices that may lead to fire ignitions and correcting those practices in coordination with the SSO, as appropriate.

5.7 Employees/Contractors

Employees and contractors are responsible for the following:

- Completing required training before working in Project area without supervision.
- Conducting operations safely to limit the risk of fire.
- Reporting potential fire hazards to their supervisors.
- Following fire emergency procedures.
- Understanding the emergency evacuation protocols.

5.8 Emergency/Incident Command

As the facility does not store or have hazardous materials, store fuels, or contain or store chemicals in a quantity that would potentially create an incident that requires ICS it is not anticipated the facility would need to lead an ICS response. However, if an incident were to arise which would require the need for ICS, the facility would fall under Lenawee County ICS and provide a Site Liaison and Site Safety Officer to work and coordinate with Lenawee County as needed.

5.9 Contact Information

The personnel listed in Table 2 are the primary site contacts to be notified during an emergency. The specific personnel will be determined prior to that start of construction and the ERP will be updated accordingly.

Table 2. Primary On-Site Emergency Notification Contacts

Name	Position	Telephone Number
To be determined ("TBD")	SSO	TBD
TBD	Construction Supervisor	TBD

Name	Position	Telephone Number
TBD	EPC Foreman	TBD
TBD	Facility Manager	TBD
TBD	Construction Supervisor	TBD

Table 3 is a list of emergency-related contacts near the Project area¹.

Table 3. Emergency-Related Contacts near the Project Area

Emergency Service	Contact	Telephone Number
Fire	Palmyra Fire Department	(517) 605-4158
Fire	Madison Charter Township Fire Department	(517) 265-6560
Ambulance	Lenawee Community Ambulance	(517) 423-1822
Lenawee County Sheriff	Sheriff Troy Bevier	(517) 263-0524
Michigan State Police	Brighton Post	(734) 475-7207
Hospital	Maria Health Care Center	(517) 266-3600
Michigan Occupational Safety and Health Administration	Lansing, Michigan, office	(517) 284-7750

¹ These Contacts will be updated and provided prior to construction starting

Attachment 1
July 23, 2025 Meeting Minutes

Meeting Minutes

Date: July 23, 2025

Time: 11am – 12:30pm

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan, Assistant Chief Brian Wilcox, and Firefighter Jeff Jackson.
- Lenawee County Emergency Management Team:
- Chris Foerg – Emergency Regional Planner.
- Craig Tanis – Emergency Management Coordinator.
- RWE Staff: Kevin Cole, Tim Love, and Alannah Woodring.

Topics Discussed: This was a joint meeting with the Lenawee County Emergency Management and Palmyra Fire Department. The Madison County Fire Department was invited but could not attend. Kevin Cole provided an overview of the project site plan and MPSC permitting requirements as well as the draft Emergency Response Plan and Fire Response Plan. An electronic copy of the plans was sent to the agencies on July 24, 2025 for review.

Following are the minutes based on the meeting transcript:

1. Purpose of Meeting

- Provide a safety and technical overview of the proposed Palmyra solar project.
- Establish communication channels between RWE, the Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Review safety protocols, emergency response planning, and project impacts from construction through decommissioning.

2. Project Overview

- Location: Southeastern Michigan, (Palmyra area).
- Current status: ~10% design phase; equipment not yet finalized.
- Site details:
 - ~2,000 acres leased.
 - ~1,234 acres expected inside the fenced project footprint (subject to updates for wetlands/habitat).
- Solar panels: 540–610 watts each, mounted on motorized trackers (25 ft. max height, ~30 in. clearance).
- Electrical system: DC → combiner boxes → inverters → transformers. Stepped up to ~34,500 volts AC before substation interconnection. DC side always energized in presence of light.
- Setbacks & fencing:
 - 50 ft. from roadways.
 - 150 ft. from non-participating property lines.
- Each solar block fully fenced for safety and security.

3. Safety & Emergency Response Procedures

3.1 General Safety

- Situational awareness and controlled communication emphasized.
- Incident Action Plans to be developed for fire, medical, and electrical incidents.

3.2 Fire & Electrical Hazards

- Defensive firefighting approach:
- Electrical fires: allow to self-extinguish.
- Brush/grass fires: water permitted >25 ft. from electrical equipment.
- Acceptable extinguishers: Class C, CO₂, or clean agent.

- Primary risks: vegetation ignition or electrical faults in panels/combiner boxes/inverters.
- No battery storage facility included in this project.

3.3 Access & Coordination

- 24/7 system monitoring via RWE dispatch (Austin, TX). Contact info to be provided to local dispatch.
- Road network: 16-ft wide gravel drives with durable base for heavy vehicles.
- Gates: labeled for mapping and quick emergency access.
- O&M Building: To be co-located near the substation. Equipped with extinguishers, AEDs, staffed by ~4 local permanent employees.
- Emergency support: RWE staff will meet responders at gates. ATVs/UTVs available for patient transport within the field.

4. Vegetation & Fire Prevention

- RWE responsible for mowing/brush clearing inside and outside fences.
- Vegetation kept minimum 8 inches below lowest panel height.
- Roads and fences serve as fire breaks.
- A wildfire risk management plan is under development, factoring in local weather/vegetation growth patterns.

5. Decommissioning & Recycling

- Construction: steel piles driven (not concreted) except at substation. All removable.
- Panels:
- May be resold, donated, or recycled.
- RWE partnered with SolarCycle for panel recycling solutions.
- Life expectancy: ~30 years, with option for 10-year extension.

6. Questions & Concerns Raised

- Drainage systems: Damaged tile drains will be flagged, repaired, and covered under warranty.
- Hazmat risk: Solar panels mainly glass/silica; hazards similar to household fires.
- Accessibility: Firefighters will be met at gates; not expected to locate victims alone.
- Fire suppression: Confirmed defensive-only approach for electrical fires.
- Security: Full fencing prevents trespassing.
- Community impact: RWE committed to supporting fairs, schools, fire departments, and 4H programs.

7. Follow-Up Actions

RWE to provide:

- Dispatch contact details, site maps, and labeled gate IDs.
- Annual Tier II hazardous materials reports and updated emergency contact lists.
- Joint training and site orientation to be scheduled prior to commissioning.
- Facility tours: possible during “Golden Row” construction phase and before operations begin.
- Emergency response plan will be collaboratively developed with the Palmyra Fire Department and Lenawee County Emergency Management Team and refreshed annually.

8. Closing

- Meeting built stronger relationships between RWE, Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Emphasis on safety-first operations, defensive firefighting posture, and transparent communication.
- Contact information exchanged; ongoing updates and training commitments reaffirmed.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment.

Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Insert PDF – Email to Paul 7/24/25 with ERP and FRP

Date: August 6, 2025

Time: 12:57 pm via text message

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan,
- RWE Staff: Kevin Cole

Topics Discussed: Paul stated that he had no comments/edits for the ERP or FRP at this time. Paul will reach out if a question or need arises.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment. Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Rouget Road Solar Farm

Exhibit A-1.10: Fire Response Plan MPSC Requirements

Lenawee County, Michigan

DECEMBER 2025

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-1.10 – FIRE RESPONSE PLAN (FRP)

A-1.10.(a) – The FRP shall include the following:

- 1. Evidence of consultation or a good-faith effort to consult with local fire department representatives to ensure that the FRP is in alignment with acceptable operating procedures, capabilities, resources, etc. If consultation with local fire department representatives is not possible, provide evidence of consultation or a good-faith effort to consult with the State Fire Marshal or other local emergency manager.**

The Applicant has consulted with local fire department representatives and shared the FRP for ongoing consultations to ensure the FRP complies with the acceptable operating procedures (see Section 1.1 of the FRP in **Appendix II Exhibit A-1.10**). A meeting was conducted on July 23, 2025 to discuss the Project and FRP. A copy of the meeting minutes is provided in **Appendix II Exhibit A-1.10**. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19.

- 2. A description of all on-site equipment and systems to be provided to prevent or handle fire emergencies.**

Section 2 of the FRP in **Appendix II Exhibit A-1.10** describes proactive measures to prevent fires such as routine mowing of vegetation, outfitting the Site with fire preventative equipment, and enforcing hot work (i.e. welding, cutting, grinding) protocols. Section 2 of the FRP notes that portable ABC-rated fire extinguishers will be strategically located throughout the Project Area including facilities buildings. Section 2 of the FRP details the requirements for hot work within the Project Area. Hot work requires the area be cleared of flammable material and post-work monitoring to ensure fires are avoided.

For more information, see also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19.

- 3. A description of all contingency plans to be implemented in response to the occurrence of a fire emergency.**

Section 3 of the FRP in **Appendix II Exhibit A-1.10** outlines the contingency procedures for treating and reporting fires.

- 4. For energy storage projects, a commitment to offer to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and at least once per year while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.**

The proposed Project is not an energy storage facility and thus the standards for approval in Exhibit A-1.10(a)(4) do not apply.

- 5. For wind and solar projects, a commitment to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and upon request while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.**

The proposed Project commits to training Project personnel and local emergency responders (see Section 4 of the FRP in **Appendix II Exhibit A-1.10**).

6. A commitment to review and update the FRP with fire departments, first responders, and county emergency managers at least once every 3 years.

The Project commits to reviewing and updating the FRP every three years and immediately following any fire incident, significant equipment modification, or emergency drill (see Section 5 of the FRP in **Appendix II Exhibit A-1.10**).

7. An analysis of whether plans to be implemented in response to a fire emergency can be fulfilled by existing local emergency response capacity. The analysis should include identification of any specific equipment or training deficiencies in local emergency response capacity and recommendations for measures to mitigate deficiencies.

The Applicant believes the plans can be fulfilled by local fire departments. Ongoing consultations are occurring to confirm. The Applicant is also committed to ensuring there are no equipment or training deficiencies in emergency response capacity. An analysis with the Palmyra Fire Department will be conducted prior to start of construction (see Section 6 of the FRP in **Appendix II Exhibit A-1.10**).

8. Other information the applicants find relevant.

Rouget Road Solar Road has provided a draft FRP in **Appendix II Exhibit A-1.10**. Sections 7 and 8 of the FRP provide for post incident actions and documentation protocols, respectively.

A-1.10.(b) – Changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing must be analyzed to determine if changes are necessary to the FRP. Additional consultation with local fire departments, first responders, and county emergency managers is required for amended plans.

If there are changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing, the Applicant will analyze the FRP to determine if updates are necessary. Additional consultation with the local fire departments, first responders, and county emergency managers is required for amended plans. See also **Appendix I, Exhibit 2**, Direct Testimony of C. Mcknight, at pp. 19.

Rouget Road Solar Farm

Exhibit A-1.10 Fire Response Plan

Lenawee County, Michigan

DECEMBER 2025

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

**FIRE RESPONSE PLAN
FOR THE ROUGET ROAD SOLAR PROJECT,
LENAWEE COUNTY, MICHIGAN**

Prepared for

Rouget Road Solar Farm, LLC
353 North Clark Street, Suite 3000
Chicago, Illinois 60654
Attn: J. Kevin Cole

Prepared by

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SWCA Project No. 78878

December 2025

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Attachments

Attachment 1. July 23, 2025 Meeting Minutes

1 INTRODUCTION

SWCA Environmental Consultants (“SWCA”), on behalf of Rouget Road Solar Farm, LLC (“Applicant”), a wholly owned subsidiary of RWE Clean Energy Development LLC, has prepared the following Fire Response Plan (“Plan”), which provides guidelines for fire prevention, preparedness, and response procedures during all phases of the Rouget Road Solar Project (“Project”), a 175-megawatt, utility-scale solar project located in Lenawee County, Michigan. This plan complements the Emergency Response Plan and complies with Exhibit A-1.10 of the Michigan Public Act 233, Occupational Safety and Health Administration regulations at 29 Code of Federal Regulations 1926.24, and National Fire Protection Association (“NFPA”) standards. It applies to construction, operation, and decommissioning of the Project.

1.1 Local Consultation

This Plan has been developed in coordination with emergency response providers, including the Palmyra Fire Department, Madison Township Fire Department, Lenawee County Emergency Management, and Lenawee County Sheriff’s Office, in accordance with Occupational Safety and Health Administration standards and other applicable federal, state, and local occupational safety and health laws, regulations, and standards. It will be the responsibility of the Applicant and its Project contractors to comply with the measures identified in this Plan. RWE met with the Lenawee County EMS and Palmyra Fire Department on July 23, 2025 to discuss the Rouget Road Solar Farm Project and this Plan. Further details on the meeting and coordination with the emergency services is in Attachment 1.

1.2 Project Description

The Project is a proposed 175-megawatt alternating current (“AC”) ground-mounted solar photovoltaic facility located on approximately 2,133 acres in Palmyra Township, Lenawee County, Michigan. Approximately 1,042 acres will be fenced for active solar use.

2 EQUIPMENT, SUPPRESSION SYSTEMS AND PREVENTION PROCEDURES

Portable ABC-rated fire extinguishers will be strategically located throughout the site including the Operations and Maintenance building, main entrance, inverter stations, and transformer areas. Each unit will have signage and unrestricted access. Inspections will be performed monthly in compliance with NFPA 10. Additional fire safety equipment may be installed based on manufacturer recommendations and initial site assessment following construction and fire prevention review by the Applicant. These additional measures will be added to the Plan prior to operations beginning.

2.2 Fire Prevention Strategies

Fire prevention begins with proactive planning and sound site management practices. The Project will implement a comprehensive set of measures to minimize the potential for fire ignition and spread.

All internal combustion engines, both stationary and mobile, will be equipped with functional spark arresters and maintained in good working order. Light trucks and cars with factory-installed mufflers may only be operated on roads cleared of vegetation, and all mufflers and catalytic converter shields will be kept in proper condition. Equipment parking areas and stationary engine sites will be cleared of flammable materials to reduce fire risk.

Vegetation within and around the Project area will be actively managed. This includes routine mowing and trimming beneath and around the solar panels to reduce fuel loads. Dead or combustible vegetation and debris will be regularly removed to maintain a clear buffer around Project infrastructure. In addition, the site will maintain clear access routes for emergency responders and ensure defensible space is preserved around key assets.

The site will be outfitted with appropriate fire prevention equipment. Fire extinguishers will be strategically placed at all construction trailers, within the Operations and Maintenance building, and near high-risk electrical components. These will be inspected on a monthly basis to ensure functionality. Signage with emergency contact information and site maps will be prominently displayed. Access to the site will be secured with perimeter fencing, which includes a Knox Box system to facilitate emergency responder entry. Designated smoking areas will be clearly marked, and smoking outside of these areas will be strictly prohibited.

For operations involving heat, such as welding or grinding, the Project will enforce strict hot work protocols. Hot work will require a permit and will not be allowed during Red Flag Warnings or other high-fire-risk weather events. During permitted hot work, the area will be cleared of flammable material and a trained fire watch will be present and remain on-site for at least 1 hour after the work is completed to monitor for flare-ups or smoldering materials.

2.2.1 Fire Risk Assessment

The Applicant will conduct a fire risk assessment prior to the commencement of construction and updated periodically during the life of the Project. The assessment will evaluate potential ignition sources, availability of fuel (e.g., vegetation, construction materials), local weather patterns (e.g., drought conditions), and emergency response capabilities in the region. This risk profile will be used to guide the placement of suppression equipment, establish vegetation management buffers, and set the frequency and depth of personnel training.

2.2.2 Hot Work and Ignition Source Controls

Hot work (e.g., welding, cutting, grinding) will be strictly controlled through a permit system administered by the Facility Manager. A hot work permit must be obtained prior to initiating any such work. The area will be cleared of flammable material and a trained fire watch will be present and remain on-site for at least 1 hour after the work is completed to monitor for flare-ups or smoldering materials. Work will be prohibited during Red Flag Warnings or other high-fire-risk conditions.

2.2.3 Combustible Material Management

To reduce ignition risks, Class A combustibles (wood, paper, cloth, plastics) will be disposed of daily, stored in proper containers, and kept clear of work areas. Class B combustibles (flammable liquids, gases, and aerosols) will be stored, handled, and dispensed only in approved locations, with bonding and grounding used during transfer. These materials will be kept away from ignition sources, exits, and high-traffic pathways. Class C combustibles (energized electrical equipment) will be de-energized before firefighting whenever possible, with only non-conductive extinguishing agents (e.g., CO₂ or ABC dry chemical) used.

3 FIRE RESPONSE CONTINGENCY PROCEDURES

In the event of a fire, a clearly defined and practiced response protocol is essential to ensure the safety of personnel and protection of property.

Immediate Actions

Upon discovery of a fire, the first action is to contact 9-1-1 to initiate emergency response. The Site Safety Officer (“SSO”) and Facility Manager must also be notified without delay. If the fire poses an immediate threat to personnel or critical equipment, evacuation procedures will be activated. All staff will proceed to designated assembly areas via posted evacuation routes. Supervisors are responsible for accounting for all personnel and ensuring that no one remains in hazardous zones. The SSO or designated staff will meet emergency responders at the site entrance to provide site access, incident details, and escort them to the fire location.

3.1 Fire Type and Management

Fire events will be managed according to the size and type of incident.

- **Small fires**, such as a trash can fire in its early stage, may be controlled with a fire extinguisher if it is safe to do so and the individual has been properly trained. Upon discovery of a small fire, the individual must immediately notify the onsite supervisor, call 9-1-1, and alert other appropriate personnel. Non-essential personnel will be removed from the hazard area. If suppression is safe, the fire may be extinguished, and the site evacuated to the muster point or designated meeting area. Work in the area will cease until the incident commander issues an “All Clear.”
- **Large fires** require immediate evacuation and professional firefighting intervention. The individual discovering must contact the onsite supervisor, call 9-1-1, and ensure all personnel leave the danger area. The Onsite Primary Contact will confirm that emergency services have been dispatched, coordinate the evacuation, and ensure that fire extinguishers are used for escape purposes only. No employee will re-enter the affected area until the Fire Department has assumed command and declared the area safe.
- **Grass and wildland fires** present a unique hazard to solar facilities. The site will be maintained with a low-fuel ground cover beneath and adjacent to the solar racking to minimize ignition potential from ember showers. Vegetation fires under or near the modules or inverters should not be fought with water or chemical agents due to the risk of electric shock or arc flash. If possible, power should be shut down at the inverter using the emergency shut-off. These fires will typically burn out quickly due to the patchy, low-intensity nature of the fuel. If flames spread away from electrical equipment, suppression efforts may be attempted from a safe distance.
- **Hot Work (Welding, Cutting, and Open Flame)** Due to the high fire risk associated with welding, cutting, grinding, or other hot work, these activities will only be performed by authorized personnel following established safety protocols. Welders must wear appropriate PPE, and oxygen-fuel gas systems must be equipped with approved backflow valves and pressure-relief devices. When required, a trained fire watch will be established, and an on-site water source (e.g., water truck or tank) will be maintained. Work areas will be cleared of combustible materials prior to starting, and operations will be suspended during extreme fire weather conditions.

4 TRAINING AND COORDINATION

Fire safety and response are only effective when supported by a culture of training, preparation, and coordination. All site personnel will be trained in the elements of the Fire Prevention Plan relevant to their duties, with a focus on preventing small incidents from escalating into serious threats. Construction and maintenance personnel will be trained and equipped to extinguish small fires when it is safe to do so.

Before beginning work, every employee must complete fire safety training as part of site safety orientation. This training will ensure personnel understand:

- Employee roles and responsibilities;
- Recognition of potential fire hazards;
- Alarm system and evacuation routes;
- Location and operation of manually operated equipment (e.g., fire extinguishers);
- Emergency response and shutdown procedures; and
- Good fire-prevention housekeeping practices and equipment maintenance.

Personnel will also review site-specific hazards, including flammable materials, fuel storage, toxic chemicals, and water-reactive substances. All employees will be required to confirm they understand the function and elements of the Fire Prevention Plan, reporting procedures, evacuation plans, and shutdown processes. Refresher training will be conducted annually and whenever significant changes are made to the facility or the Plan.

Coordination with Emergency Services:

The Applicant will conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and upon request while the facility is in operation. The Project team will work closely with the Madison and Palmyra Township Fire Departments to schedule joint training sessions and familiarize responders with the site layout, hazards, access points, procedures, current best practices, and emergency shutoffs. A preconstruction walkthrough will be conducted, and site plans will be shared with local fire departments to facilitate effective response. Any recommendations for additional equipment or operational changes will be reviewed and incorporated where feasible.

Evacuation Drills:

Drills will be conducted twice per year to ensure staff are familiar with procedures. Evacuation routes and assembly points will be posted throughout the site and reviewed during safety training sessions.

Use of Portable Fire Extinguishers:

- A minimum of one portable fire extinguisher will be located within 65 meters of any work area during construction or heavy maintenance.
- Extinguishers will be inspected monthly, kept unobstructed, and placed in conspicuous locations.

Site Maintenance & Housekeeping:

- Combustible materials will not be stored in mechanical rooms or near electrical panels.
- All electrical panel openings will be covered.

- Power bars will be plugged directly into outlets and used only temporarily.
- Extension cords and flexible cords will not be substituted for permanent wiring.

This coordinated approach, combining comprehensive employee training, strong housekeeping practices, and close collaboration with local fire departments, ensures that both site personnel and emergency responders are aligned in expectations and fully prepared to act in the event of a fire.

5 PLAN REVIEW AND UPDATE SCHEDULE

This Plan will be reviewed and updated every three years and immediately following any fire incident, significant equipment modification, or emergency drill. Updates will be communicated to all staff and shared with the Madison Township Fire Department and Palmyra Township Fire Departments as well as the Lenawee County Emergency Services. Documentation of review cycles and personnel acknowledgment of updates will be maintained on-site.

6 ASSESSMENT OF FIRE RESPONSE CAPACITY AND READINESS

Based on consultation with Lenawee County EMS and the Palmyra Township Fire Departments, current equipment and staffing levels are expected to be adequate for initial response. Rouget Road is not currently aware of any specific equipment or training deficiencies in local emergency response capacity. Further assessment will occur post-construction to identify and address any additional needs. If any deficiencies in response capacity are identified during further assessment, Rouget Road will take steps to identify and recommend measures to mitigate deficiencies.

7 POST-INCIDENT ACTIONS

Following any fire incident, a structured post-incident review will be initiated. This includes conducting a root cause analysis to identify the origin and contributing factors of the incident. Findings will be documented in an incident report and corrective measures will be implemented to prevent recurrence.

Damaged infrastructure will be promptly assessed and repaired or replaced as necessary. This Plan will be reviewed in light of the event and updates will be made to address any procedural gaps or necessary improvements.

Coordination with emergency responders will continue through the post-incident phase to ensure a comprehensive evaluation of response effectiveness. Lessons learned will be shared with the full Project team to improve preparedness and safety protocols going forward.

8 INCIDENT DOCUMENTATION AND REPORTING

All fire events, regardless of size or impact, will be documented using a standardized Incident Report Form. The Incident Report Form will be developed prior to the start of construction. Information collected will include the date and time of incident, exact location, personnel involved, nature and suspected cause of fire, response actions taken, and follow-up measures implemented. These records will be stored for a minimum of 5 years and reviewed regularly to identify trends or improvements.

9 CONTACT INFORMATION

Table 1. Contact Information

Organization	Contact	Role	Phone	Contact Method
Rouget Road Solar Farm, LLC	TBD prior to construction	Facility Manager	TBD	TBD
Palmyra Fire Department	Paul Rohlan	Fire Chief	(517) 605-4158	prohlan@gmail.com
Madison Fire Department	Nic Wilson	Fire Chief	(517) 265-6560	TBD
Lenawee County Sheriff	Troy Bevier	Sheriff	(517) 263-0524	sheriffrecords@lenawee.mi.us
Lenawee County Emergency Management	Craig Tanis	Coordinator	(517) 264-4756	https://www.lenawee.mi.us/383/Emergency-Services

Attachment 1
July 23, 2025 Meeting Minutes

Meeting Minutes

Date: July 23, 2025

Time: 11am – 12:30pm

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan, Assistant Chief Brian Wilcox, and Firefighter Jeff Jackson.
- Lenawee County Emergency Management Team:
- Chris Foerg – Emergency Regional Planner.
- Craig Tanis – Emergency Management Coordinator.
- RWE Staff: Kevin Cole, Tim Love, and Alannah Woodring.

Topics Discussed: This was a joint meeting with the Lenawee County Emergency Management and Palmyra Fire Department. The Madison County Fire Department was invited but could not attend. Kevin Cole provided an overview of the project site plan and MPSC permitting requirements as well as the draft Emergency Response Plan and Fire Response Plan. An electronic copy of the plans was sent to the agencies on July 24, 2025 for review.

Following are the minutes based on the meeting transcript:

1. Purpose of Meeting

- Provide a safety and technical overview of the proposed Palmyra solar project.
- Establish communication channels between RWE, the Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Review safety protocols, emergency response planning, and project impacts from construction through decommissioning.

2. Project Overview

- Location: Southeastern Michigan, (Palmyra area).
- Current status: ~10% design phase; equipment not yet finalized.
- Site details:
 - ~2,000 acres leased.
 - ~1,234 acres expected inside the fenced project footprint (subject to updates for wetlands/habitat).
- Solar panels: 540–610 watts each, mounted on motorized trackers (25 ft. max height, ~30 in. clearance).
- Electrical system: DC → combiner boxes → inverters → transformers. Stepped up to ~34,500 volts AC before substation interconnection. DC side always energized in presence of light.
- Setbacks & fencing:
 - 50 ft. from roadways.
 - 150 ft. from non-participating property lines.
- Each solar block fully fenced for safety and security.

3. Safety & Emergency Response Procedures

3.1 General Safety

- Situational awareness and controlled communication emphasized.
- Incident Action Plans to be developed for fire, medical, and electrical incidents.

3.2 Fire & Electrical Hazards

- Defensive firefighting approach:
- Electrical fires: allow to self-extinguish.
- Brush/grass fires: water permitted >25 ft. from electrical equipment.

- Acceptable extinguishers: Class C, CO₂, or clean agent.
- Primary risks: vegetation ignition or electrical faults in panels/combiner boxes/inverters.
- No battery storage facility included in this project.

3.3 Access & Coordination

- 24/7 system monitoring via RWE dispatch (Austin, TX). Contact info to be provided to local dispatch.
- Road network: 16-ft wide gravel drives with durable base for heavy vehicles.
- Gates: labeled for mapping and quick emergency access.
- O&M Building: To be co-located near the substation. Equipped with extinguishers, AEDs, staffed by ~4 local permanent employees.
- Emergency support: RWE staff will meet responders at gates. ATVs/UTVs available for patient transport within the field.

4. Vegetation & Fire Prevention

- RWE responsible for mowing/brush clearing inside and outside fences.
- Vegetation kept minimum 8 inches below lowest panel height.
- Roads and fences serve as fire breaks.
- A wildfire risk management plan is under development, factoring in local weather/vegetation growth patterns.

5. Decommissioning & Recycling

- Construction: steel piles driven (not concreted) except at substation. All removable.
- Panels:
- May be resold, donated, or recycled.
- RWE partnered with SolarCycle for panel recycling solutions.
- Life expectancy: ~30 years, with option for 10-year extension.

6. Questions & Concerns Raised

- Drainage systems: Damaged tile drains will be flagged, repaired, and covered under warranty.
- Hazmat risk: Solar panels mainly glass/silica; hazards similar to household fires.
- Accessibility: Firefighters will be met at gates; not expected to locate victims alone.
- Fire suppression: Confirmed defensive-only approach for electrical fires.
- Security: Full fencing prevents trespassing.
- Community impact: RWE committed to supporting fairs, schools, fire departments, and 4H programs.

7. Follow-Up Actions

RWE to provide:

- Dispatch contact details, site maps, and labeled gate IDs.
- Annual Tier II hazardous materials reports and updated emergency contact lists.
- Joint training and site orientation to be scheduled prior to commissioning.
- Facility tours: possible during “Golden Row” construction phase and before operations begin.
- Emergency response plan will be collaboratively developed with the Palmyra Fire Department and Lenawee County Emergency Management Team and refreshed annually.

8. Closing

- Meeting built stronger relationships between RWE, Palmyra Fire Department, the Lenawee County Emergency Management Team, and local landowners.
- Emphasis on safety-first operations, defensive firefighting posture, and transparent communication.
- Contact information exchanged; ongoing updates and training commitments reaffirmed.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment. Edits will be incorporated into the ERP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Insert PDF – Email to Paul 7/24/25 with ERP and FRP

Date: August 6, 2025

Time: 12:57 pm via text message via text message

Attendees:

- Palmyra Township Fire Department: Chief Paul Rohlan,
- RWE Staff: Kevin Cole

Topics Discussed: Paul stated that he had no comments/edits for the ERP or FRP at this time. Paul will reach out if a question or need arises.

Next Steps and Associated Timeline: As the ERP format has been updated to meet MPSC requirements, an electronic copy of the plans will be sent to the agencies in December 2025 for review and comment. Edits will be incorporated into the FRP. Any updates to the plan will be sent to MPSC. An on-site meeting with the agencies to discuss the project, ERP, and FRP will be held just prior to the start of construction.

Utility Coordination

November 25, 2025:

Citizens Light & Power Company Email Correspondence and Attachments

Consumers Power Company Email Correspondence and Attachments

Marathon Pipeline Company Email Correspondence and Attachments

Vertical Bridge Cell Tower Email Correspondence and Attachments

December 1, 2025 Email Correspondence with Consumers Power Company :

Not Available for Inclusion

From: [Carol McKnight](#)
To: infocgfc@dteenergy.com
Cc: [Cole, J Kevin](#); [Aleyda Galan](#); [Zachary Emery](#)
Subject: Rouget Road Solar Farm Project Introduction and contact request.
Date: Tuesday, November 25, 2025 8:28:42 AM
Attachments: [image001.png](#)
[ExhibitA_1_2_fig2_USGS_20251106.pdf](#)
[ExhibitA_1_2_fig6_utility_Series_20251106.pdf](#)

Hello Citizens Light & Power Company,

Good morning. Rouget Road Solar Farm, LLC (Applicant), a wholly owned subsidiary of RWE, is in the process of developing a large-scale, 175-megawatt renewable solar energy project (Project) in Palmyra Township, Lenawee County, Michigan, southeast of the city of Adrian. The Project area (leased area) totals approximately 2,133 acres of privately owned, predominately agricultural land (see attached figures). Development of the Project will include solar arrays, collections lines, substation, and associated facilities within a fence line. The Project will be submitted to the Michigan Public Service Commission for a Renewable Energy or Storage Siting Certificate (Certificate) pursuant to Public Act 233 of 2023.

SWCA Environmental Consultants (SWCA), on behalf of the Applicant, provides this Project introductory email as utility crossing agreements will be required. As the Project design progresses, the Applicant will continue to coordinate with Citizens Light & Power regarding utility crossing agreements for the Project. Can you confirm that you are the person to contact in the future?

Please let me know if you have any questions.

Thank you,
Carol

Carol McKnight
Principal Project Manager

SWCA Environmental Consultants
Lebanon, Ohio 45036
P 207.544.1021 | C 513.284.0152
carol.mcknight@swca.com



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From: [Carol Mcknight](#)
To: joelle.foshee@cmsenergy.com
Cc: [Cole, J Kevin](#); [Aleyda Galan](#); [Zachary Emery](#)
Subject: Rouget Road Solar Farm Project Introduction and contact request
Date: Tuesday, November 25, 2025 12:51:58 PM
Attachments: [ExhibitA_1_2_fig2_USGS_20251106.pdf](#)
[image001.png](#)
[ExhibitA_1_2_fig6_utility_Series_20251106.pdf](#)

Hello Joelle R. Foshee (Consumers Power Company),

Good morning. Rouget Road Solar Farm, LLC (Applicant), a wholly owned subsidiary of RWE, is in the process of developing a large-scale, 175-megawatt renewable solar energy project (Project) in Palmyra Township, Lenawee County, Michigan, southeast of the city of Adrian. The Project area (leased area) totals approximately 2,133 acres of privately owned, predominately agricultural land (see attached figures). Development of the Project will include solar arrays, collections lines, substation, and associated facilities within a fence line. The Project will be submitted to the Michigan Public Service Commission for a Renewable Energy or Storage Siting Certificate (Certificate) pursuant to Public Act 233 of 2023.

SWCA Environmental Consultants (SWCA), on behalf of the Applicant, provides this Project introductory email as utility crossing agreements will be required. As the Project design progresses, the Applicant will continue to coordinate with Consumers Power Company regarding utility crossing agreements for the Project. Can you confirm that you are the person to contact in the future?

Please let me know if you have any questions.

Thank you,
Carol

Carol McKnight
Principal Project Manager

SWCA Environmental Consultants
Lebanon, Ohio 45036
P 207.544.1021 | C 513.284.0152
carol.mcknight@swca.com



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From: [Carol Mcknight](#)
To: mplinfo@marathonpetroleum.com
Cc: [Cole, J Kevin](#); [Aleyda Galan](#); [Zachary Emery](#)
Subject: Rouget Road Solar Farm Project Introduction and contact request
Date: Tuesday, November 25, 2025 12:55:16 PM
Attachments: [ExhibitA_1_2_fig2_USGS_20251106.pdf](#)
[image001.png](#)
[ExhibitA_1_2_fig6_utility_Series_20251106.pdf](#)

Hello Marathon Pipeline Company,

Good morning. Rouget Road Solar Farm, LLC (Applicant), a wholly owned subsidiary of RWE, is in the process of developing a large-scale, 175-megawatt renewable solar energy project (Project) in Palmyra Township, Lenawee County, Michigan, southeast of the city of Adrian. The Project area (leased area) totals approximately 2,133 acres of privately owned, predominately agricultural land (see attached figures). Development of the Project will include solar arrays, collections lines, substation, and associated facilities within a fence line. The Project will be submitted to the Michigan Public Service Commission for a Renewable Energy or Storage Siting Certificate (Certificate) pursuant to Public Act 233 of 2023.

SWCA Environmental Consultants (SWCA), on behalf of the Applicant, provides this Project introductory email as utility crossing agreements will be required. As the Project design progresses, the Applicant will continue to coordinate with Marathon Pipeline Company regarding utility crossing agreements for the Project. Can you confirm that you are the person to contact in the future?

Please let me know if you have any questions.

Thank you,
Carol

Carol McKnight
Principal Project Manager

SWCA Environmental Consultants
Lebanon, Ohio 45036
P 207.544.1021 | C 513.284.0152
carol.mcknight@swca.com



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From: [Carol Mcknight](#)
To: bill.maxwell@verticalbridge.com; mereida.bowens@verticalbridge.com
Cc: [Cole, J Kevin](#); [Aleyda Galan](#); [Zachary Emery](#)
Subject: Rouget Road Solar Farm Project Introduction and contact request
Date: Tuesday, November 25, 2025 1:09:25 PM
Attachments: [ExhibitA_1_2_fig2_USGS_20251106.pdf](#)
[image001.png](#)
[ExhibitA_1_2_fig6_utility_Series_20251106.pdf](#)

Hello Bill Maxwell and Mereida Bowens (Vertical Bridge Cell Tower),

Good morning. Rouget Road Solar Farm, LLC (Applicant), a wholly owned subsidiary of RWE, is in the process of developing a large-scale, 175-megawatt renewable solar energy project (Project) in Palmyra Township, Lenawee County, Michigan, southeast of the city of Adrian. The Project area (leased area) totals approximately 2,133 acres of privately owned, predominately agricultural land (see attached figures). Development of the Project will include solar arrays, collections lines, substation, and associated facilities within a fence line. The Project will be submitted to the Michigan Public Service Commission for a Renewable Energy or Storage Siting Certificate (Certificate) pursuant to Public Act 233 of 2023.

SWCA Environmental Consultants (SWCA), on behalf of the Applicant, provides this Project introductory email. As the Project design progresses, the Applicant will continue to coordinate with Vertical Bridge Cell Tower regarding setback requirements for the Project. Can you confirm that you are the person to contact in the future?

Please let me know if you have any questions.

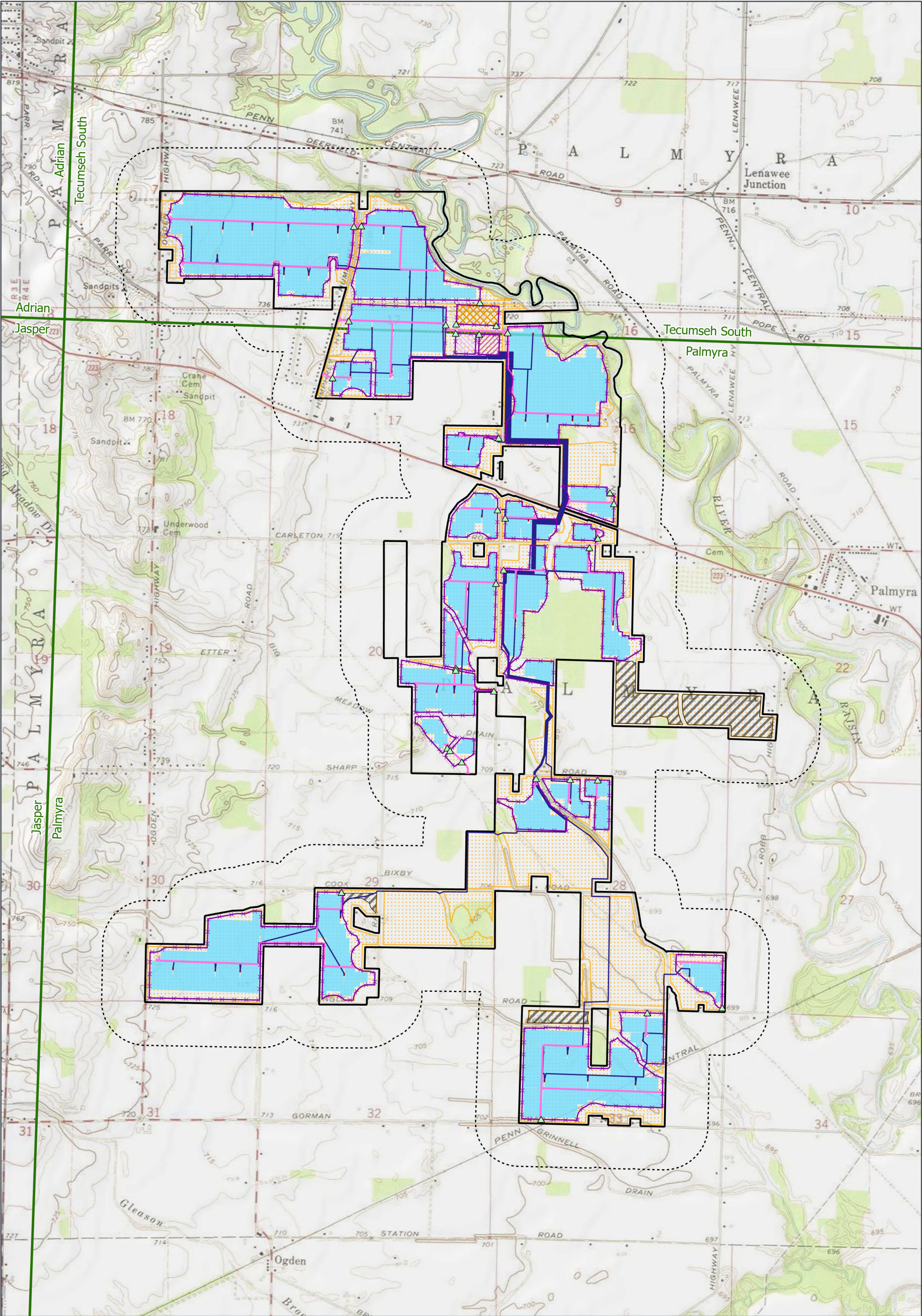
Thank you,
Carol

Carol McKnight
Principal Project Manager

SWCA Environmental Consultants
Lebanon, Ohio 45036
P 207.544.1021 | C 513.284.0152
carol.mcknight@swca.com



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ROUGET ROAD SOLAR FARM
Exhibit A-1.2
Figure 2
Site Location Map
USGS 1:24000

Proposed Layout

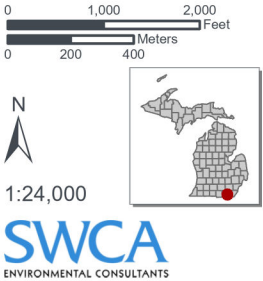
- △ Gate
- ✂ Fence
- Access Road
- Underground Cable

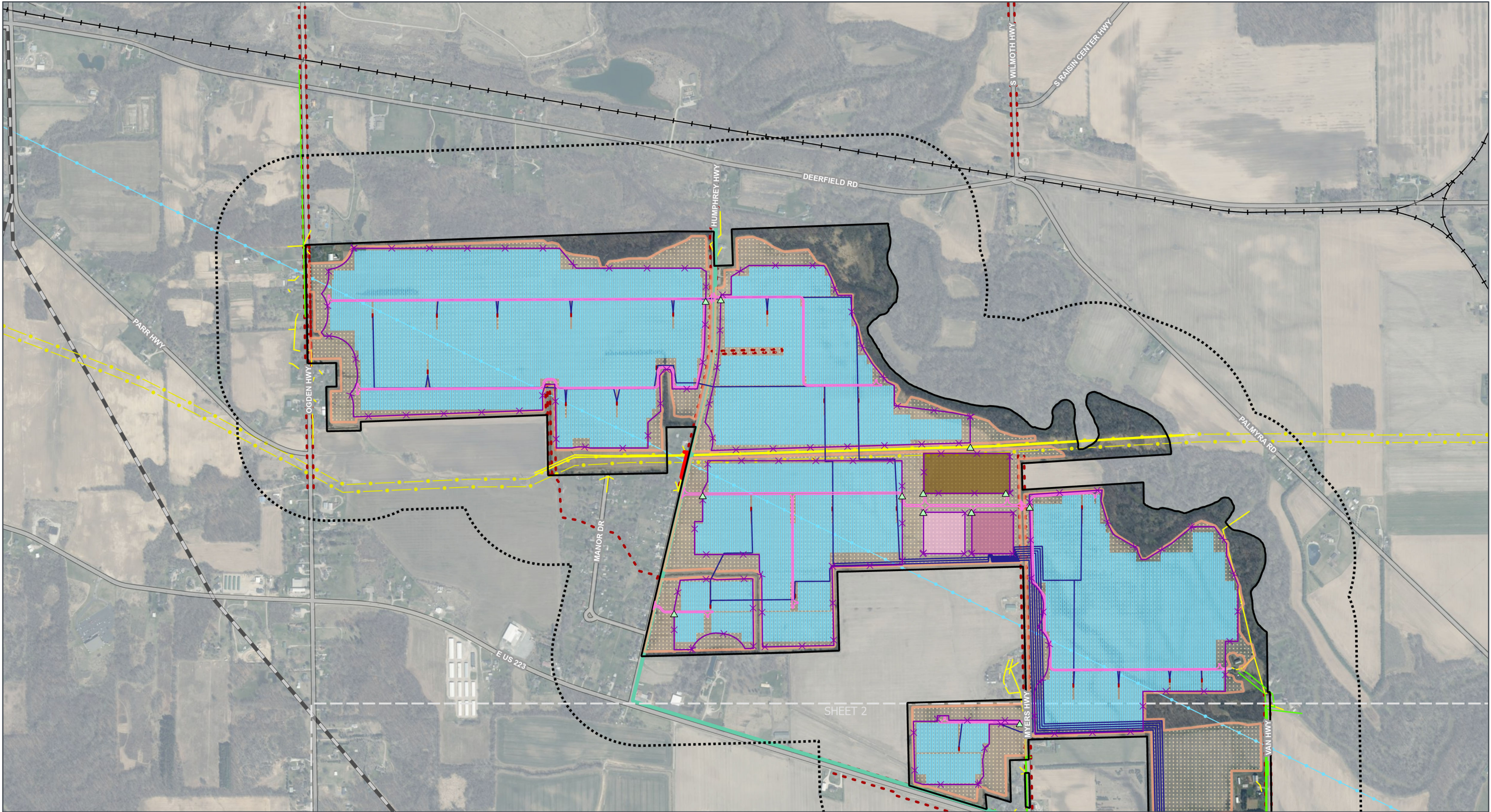
- Inverter
- Solar Panel
- ▨ Laydown Area
- ▨ O&M Pad
- ▨ Substation Pad
- ▨ Switchyard Pad

- ▨ 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

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
Layout: ExhibitA 1.2 fig2 USGSScale
Aprx: 78878_Rouget_Permitting





ROUGET ROAD SOLAR FARM

Exhibit A-1.2

Figure 6

Existing Utilities Map

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
Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
ExhibitA_1_2_fig6_utility_Series
Aprx: 78878_Rouget_Permitting

0 500 1,000
0 125 250
Feet
Meters

N

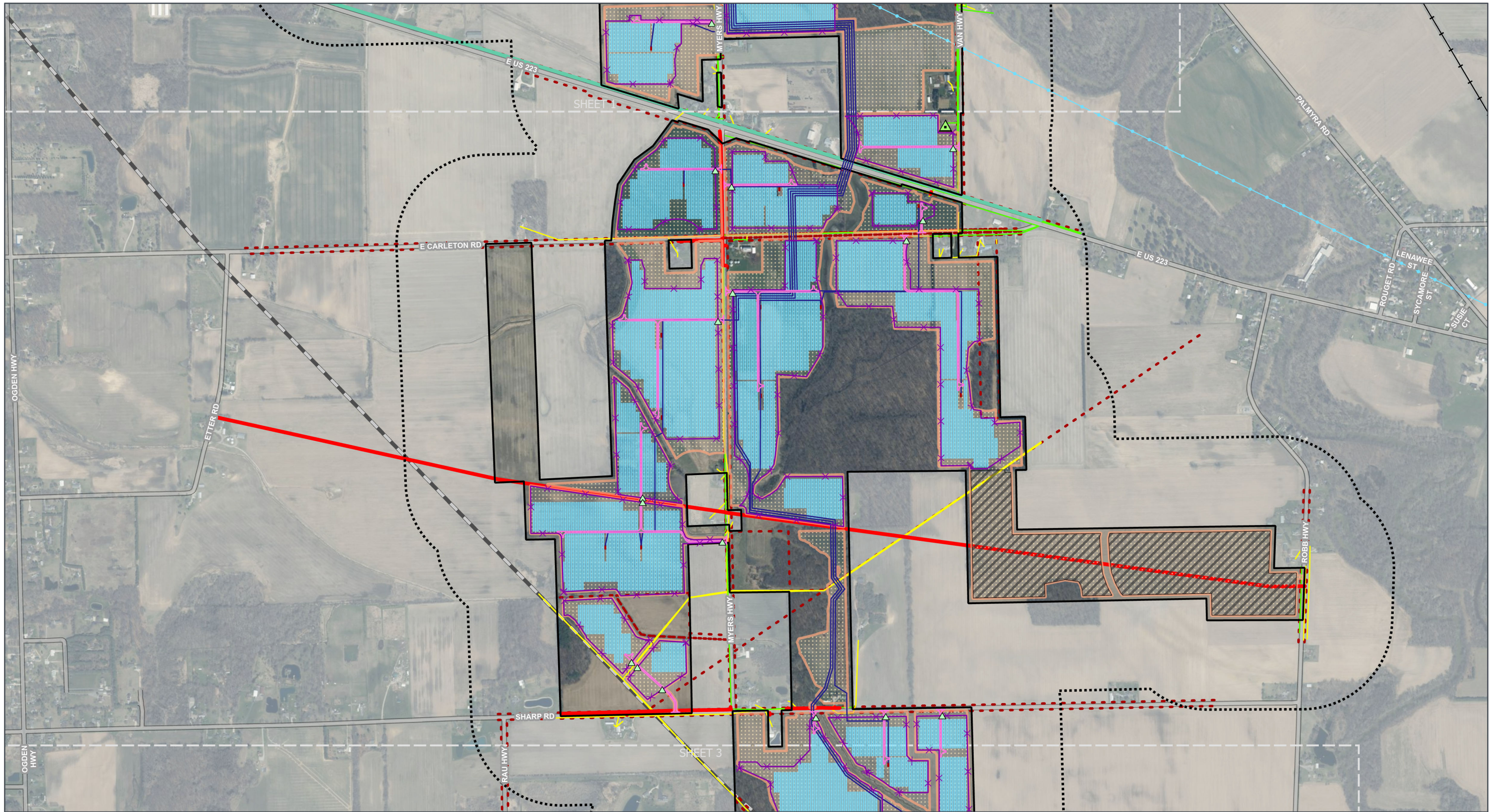
1:12,000

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2
3

Sheet 1 of 3

Exhibit A-4.4 Page 542



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

Utilities Outside of Project (Approximate)

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

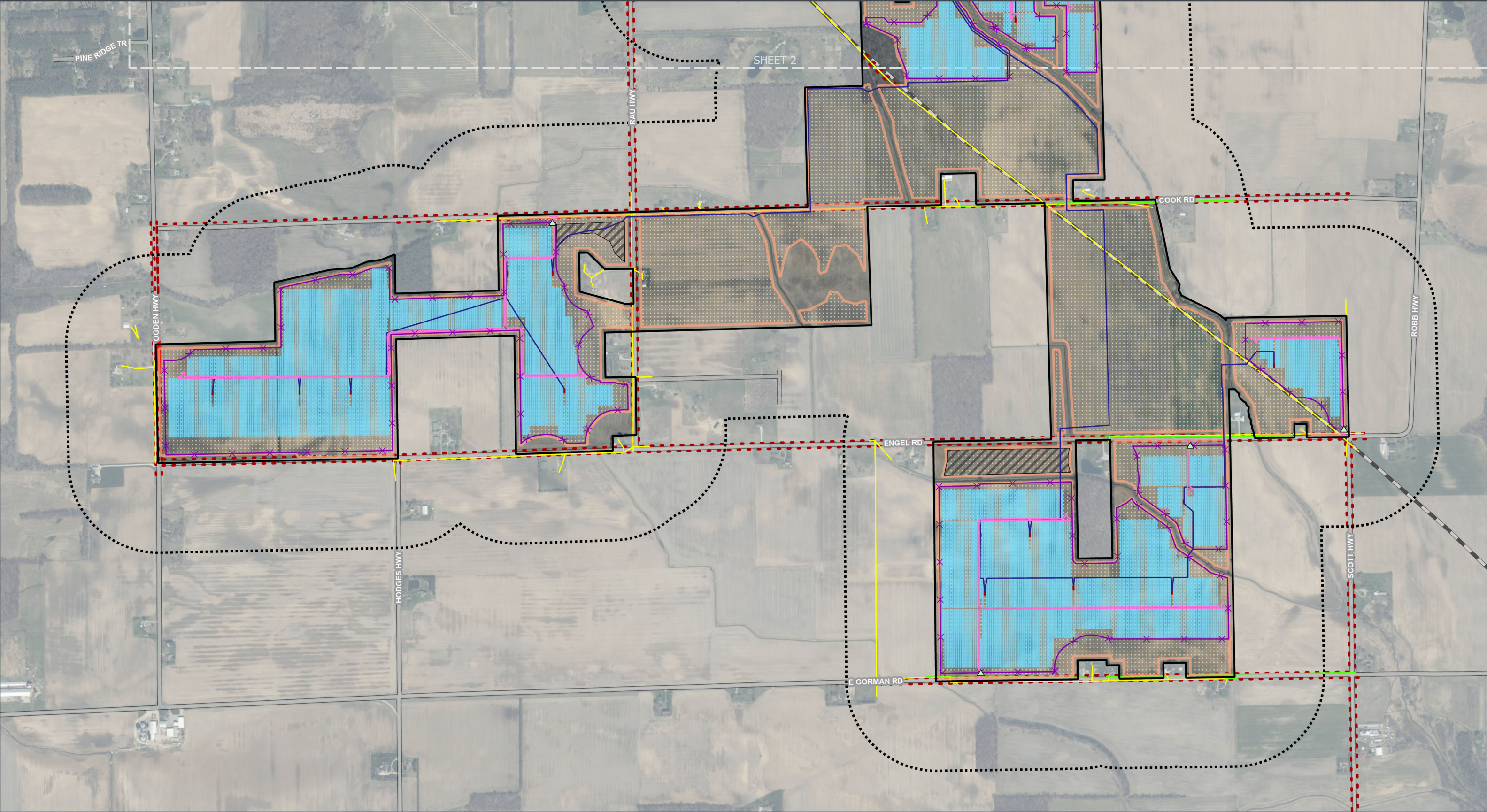
Wastewater Line
△ Cell Tower

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_fig6_utility_Series
Aprx: 78878_Rouget_Permitting

1:12,000

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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

Base Map: Esri ArcGIS Online,
accessed November 2025
Updated: 11/6/2025
Project No. 78878
ExhibitA_1_2_fig6_utility_Series
Aprx: 78878_Rouget_Permitting

0 500 1,000
0 125 250
Feet
Meters

N

1:12,000

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1
2
3

Exhibit A-4.4 Page 544