RIVERBEND WIND ENERGY FACILITY

Exhibit A-1.3
EXPLANATORY INFORMATION

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EXHIBIT A-1.3 – EXPLANATORY INFORMATION

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

The Project is situated in Fremont and Speaker Townships, as well as the southeast corner of Elk Township in Sanilac County, Michigan. Sanilac County is on the eastern edge of Michigan, approximately 60 miles north of the metro Detroit area. The Project is located approximately 3 miles north of the City of Yale and approximately 13 miles south of Sandusky, the largest city in Sanilac County. In general, the topography of the Project Area includes relatively flat terrain dominated by agricultural use. Much of the native forest cover has been cleared for farmland, but wooded areas still exist primarily near creeks and areas less desirable for farming. There are numerous creeks and drains within the Project Area, but no large rivers or lakes. Key landmarks in Sanilac County include the Sanilac Petroglyphs Historic State Park, Sanilac County Historic Village & Museum, Port Sanilac Lighthouse, Lexington State Harbor, Forester Park, and the Minden City State Game Area.

According to the U.S. Census Bureau, as of 2023, Fremont Township had a population of 874 with a median age of 49.5 years. The racial composition is predominantly White (94.6%), with minimal representation from other racial and ethnic groups. The median household income stands at $62,361, and the poverty rate is at 8.7%. According to the U.S. Census Bureau, as of 2023, Speaker Township had a population of 1,446 with a median age of 36.6 years. The township's racial makeup is 92.9% White, with Hispanic or Latino (2.6%), and other racial groups comprising the remainder. The average household income is $57,778, and the poverty rate at 8.6%. According to the U.S. Census Bureau, as of 2023, Elk Township had a population of 1,378 with a median age of 51.8 years. The township's racial makeup is 89.7% White, with Hispanic or Latino (5.2%), African American (1.7%), and other racial groups comprising the remainder. The average household income is $58,636, and the poverty rate at 10.8%. Key industries in Sanilac County include agriculture, manufacturing, and tourism and recreation.

Section II of the testimony provided by witness Sanford provides explanations of the elements and features shown on the figures and maps provided in **Exhibit A-1.1** and **Exhibit A-1.2**.

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

i. Environmental and Natural Resource impacts

The Project will adhere to applicable local, state and federal permitting requirements and will consult with relevant agencies such as the USFWS, MDNR and EGLE to consider recommended best management practices (“BMPs”) in relation to environmental and natural features.

The Project is unlikely to impact the water quality or water supply in the area. The Project is designed such that post-construction stormwater flows will not materially exceed pre-construction flow in order to preserve existing drainage patterns. Implementation of a Soil Erosion and Sedimentation Control Plan and BMPs will minimize adverse effects on soil and water quality during construction and operation. Natural features of the landscape will be retained wherever practicable to help control erosion and contain storm water runoff.

Additionally, water usage for the Project is only anticipated during the construction phases to fill water trucks for dust control and vegetation purposes. Water usage will be minimal and in accordance with any applicable regulations and landowner agreements, and there are no proposed plans for water to be obtained from local wells for continual use once construction is complete.

Operation of a wind energy facility will not generate emissions, smoke, fumes, or odors. The proposed Project will generate a small amount of consumables waste during operations as well as waste associated with construction activities that will be handled and disposed of in a safe manner consistent with applicable regulations. The Project will not generate liquids or other waste, solid or hazardous, that is detrimental to health, safety, or general welfare. As such, the Project is unlikely to disturb or create hazards to any surrounding uses permitted within the zoning districts adjacent to the Project or produce any hazardous by-products.

Numerous studies and reports have been completed as part of the due diligence process to ensure impacts to threatened and endangered species and sensitive habitats will be minimized. These studies include a Phase 2 Presence/Absence Bat Acoustic Survey (2021), Bat Migration Acoustic Survey (2022) Raptor Nest Survey (2021), Large and Small Bird Use Survey Report (2021-2022) Year Two Pre-Construction Avian Survey (2022-2023), Wetland Delineation Report (2021, 2022, 2023 & 2024) and a Threatened and Endangered Species Habitat Assessment (2023). Refer to the Environmental Compliance Report in **Appendix 6.2-A** within **Exhibit A-6.2** for these studies and additional information regarding the Applicant's commitment to minimizing impacts to Environmental and Natural Resources.

ii. Noise

Predicted noise levels for all nonparticipating residences are at or below the 55 dBA (average hourly) limit set forth in MCL 460.1226. Refer to the Sound Reports in **Appendix 1.7-A** and **1.7-B** within **Exhibit A-1.7**. Construction equipment will be equipped with any applicable legally required noise mitigation. The Applicant will coordinate with the Engineering Procurement and Construction (EPC) contractor, once determined, to ensure that sound specific mitigation measures are implemented and followed to the extent practicable.

iii. Visual impacts

Project structures, including towers and turbines, will be painted with non-reflective/off-white color designed to minimize visual impacts. The wind turbine base and blades shall be a color consistent with industry standards. No advertising or graphics will be placed on any part of the tower or blades. Mandatory lighting required by the FAA will be implemented, which could include only certain turbines, and the potential to synchronize lights to minimize impacts and preserve the rural character of the surrounding area.

iv. Impacts to traffic

The expected traffic generated by the Project will be safely and efficiently accommodated by the existing capacity of the road system. Construction of the Project will be conducted using current roads and highway infrastructure. The Project team will inform the local authority of potential disruptions to traffic during construction. The Project will not create excessive traffic during the operational phase. Each turbine is serviced by its own access road. The Project's setback distances from the roads are great enough to ensure the protection of the traveling public and nearby properties from any possible tower collapse, blade/fragment dislodgement, or ice throw from blades. Transportation and installation of the Project's components will likely require temporary

impacts such as turning radii improvements, as well as temporary impacts to infrastructure such as road signs and above ground utilities. All temporary impacts will be restored to their original state to the maximum extent practicable. The Project will work closely the Sanilac County Road Commission during construction to minimize any potential impacts to local traffic. Temporary radii improvements as well as any proposed permanent access roads will be graded and will consist of gravel over compacted material.

Prior to Project construction, the Applicant will continue consulting with the Sanilac County Road Commission regarding workforce and component delivery routes to obtain any necessary approvals. Additionally, the Applicant will enter into a Road Use Agreement with the Sanilac County Road Commission. During operation, the Project will generate minimal vehicular or pedestrian traffic. Access roads were designed to provide ingress and egress points for maintenance crews and emergency service vehicles and will not increase runoff to existing drains.

v. Impacts to solid waste disposal capacity

Waste generated throughout the Project life cycle, including construction and operation, will be handled and disposed of in a manner that complies with applicable environmental regulations. Waste and hazardous materials will be collected and stored in proper storage containers at the operation and maintenance building onsite prior to disposal. Waste that cannot be recycled will be transported to an approved landfill facility. Recyclables, such as metals, glass, plastics and paper products will be taken to certified recycling facilities. Any materials deemed hazardous will be managed according to applicable environmental regulations, with the involvement of certified hazardous waste disposal companies.

vi. Impacts to county and intercounty drains and preliminary plans to minimize, mitigate, and repair drainage issues; and

The proposed Project's excavation and stormwater management measures are designed to prevent increased surface drainage and minimize runoff to adjacent properties. The Project will obtain applicable permits and comply with Erosion and Sediment Control and Storm Water Management best practices. Above-ground infrastructure will be set back from any county drain right-of-way. If deemed necessary, a crossing permit and/or agreement will be obtained from the Sanilac County Drain Commissioner.

vii. Other impacts to non-participating property owners during construction and operation.

The Project is, and its construction, operation, and maintenance plans are, designed to prevent adverse effects to non-participating property owners.

The Project will preserve the agricultural character and visual appearance of the area by maintaining adequate setbacks from inhabited structures, non-participating parcel property lines, and public roads. The closest proposed turbine location to a non-participating property line is 748 feet, and 762 feet to a public road. As noted above, design measures such as the color of the turbines and lack of graphics on the turbines will be employed to help preserve the viewshed of adjacent non-participating properties. Land owners will be free to continue to utilize portions of the Project Area outside of the turbine pads for farming or other agricultural uses helping to preserve the character of the area for non-participating propery owners.

The Applicant conducted a shadow flicker analysis at occupied structures. Turbines will be limited to producing no more than thirty (30) hours of shadow flicker per year at a non-participating

residence by commercially reasonable mitigation including a curtailment schedule that demonstrates the plan for operating the Project turbines while limiting the expected shadow flicker to below the 30-annual-hour requirement. Refer to **Appendix 1.8-A** within **Exhibit A-1.8** for the results of the shadow flicker analysis.

Any excavation measures required for the Project will not increase surface drainage. Furthermore, stormwater mitigation efforts will minimize run-off to adjacent properties or county drains.

Wind turbine towers will not be climbable on the exterior. All utility grid wind energy systems are designed to prevent unauthorized access to electrical and mechanical components and have access doors that are kept securely locked at all times when service personnel are not present. All access doors to wind turbine towers and electrical equipment will be lockable. Appropriate warning signs will be placed on wind turbines towers, electrical equipment, and Wind Energy Facility entrances.

The Project will properly maintain all access roads and work with landowners to provide adequate measures to deter trespassers from the public right of way entrance.

The Project will work with the local fire departments and first responders to provide any necessary safety information, equipment, and annual training necessary to comply with any safety requirements or emergency situations that may occur protecting both non-participating land owners and the public at large. Refer to the Emergency Response Plan in **Appendix 1.9-A** and Fire Response Plan in **Appendix 1.10-A**.

The Project will comply with all applicable provisions of recognized national and international engineering standards, including: International Building Code (IBC), American Society of Civil Engineers (ASCE) 7, American Concrete Institute (ACI) 318, American Society for Testing and Materials (ASTM) Standards, American Institute of Steel Construction (AISC) Steel Manual, National North American Electric Reliability Corporation (NERC) Reliability Standards, National Electric Code (NEC), Institute of Electrical and Electronics Engineers (IEEE) Standards National Electric Safety Code (NESC), International Electrotechnical Commissioning (IEC) Standards National Fire Protection Association (NFPA).

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

The Applicant has secured approximately 31,326 acres of participating land under lease agreement throughout Sanilac County, Michigan, of which only approximately 79 acres of land will be utilized for above ground infrastructure. The remaining unused acreage will be restored and returned to landowners following construction.

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

The Project will include up to 26 turbines, as well as underground collection, substation, switch yard, O&M building, MET tower, and ADLS within Fremont Township. The Project will include up to 24 turbines, as well as underground collection, MET tower, and ADLS within Speaker Township. Infrastructure within Elk Township will be limited to underground collection.

4. Provide a qualitative assessment of the compatibility of the facility, including any off-site staging and storage areas, with existing, proposed and allowed land uses located within a 1,000-foot perimeter of the facility site. The assessment shall identify the nearby land uses of and shall address the land use impacts of the facility on residential areas, schools, civic facilities, recreational facilities, and commercial areas. The assessment and evaluation shall demonstrate

that conflicts from facility-generated noise, traffic, and visual impacts with current and planned uses have been minimized to the extent practicable.

The Project is proposed in an area in which the primary land use is agricultural and is favorable for wind energy development. In 2011, the Michigan Department of Agriculture and Rural Development issued guidance, entitled "Wind Turbines on Land Enrolled in a PA 116," establishing that commercial wind development is consistent with farmland preservation and permitted on land enrolled under Part 361 of the Natural Resources and Environmental Protection Act. The Project use is consistent with agricultural uses, with infrastructure located in a manner that current farming activities will not be disrupted. Refer to **Appendix 1.2-A - Figure 3 – Land Use Map** and **Figure 9 – Recreational and Other Land Uses Map**.

Surrounding woodlots and farmland will be preserved to the extent possible, with a large majority of the Project Area available for continued agricultural use outside of the active operational footprint. Rural residences within the Project Area will be minimally impacted through adherence to required setbacks and sound and shadow flicker restrictions, ensuring that the Project maintains the rural and residential character of the area.

The Project has been sited to avoid occupied structures to the extent practicable, including schools, civic facilities, recreational facilities and commercial areas. Refer to **Appendix 1.2-A - Figure 10 – Occupied Dwellings Map** for the Project's location in relation to occupied structures and **Figure 9 – Recreational and Other Land Uses Map** within **Exhibit A-1.2** for the locations of civic facilities and recreational facilities in relation to the Project. Refer to Sheet 3 and Sheet 35 of **Appendix 1.1-A – Project Layout** within **Exhibit A-1.1** for the available township zoning information regarding commercial areas. Additionally, Turbine 10 is located adjacent to the Village of Melvin which primarily consists of residential parcels, a small number of businesses and civic facilities. However, none of these features are located within 1,000 feet of the Project facility. No schools were identified within 1,000 feet of the Project facility.

Noise associated with turbine operation will not exceed 55 dBA (average hourly) as required by PA 233 and in accordance with Attachment D of the Application Filing Instructions and Procedures. Visual impacts will be minimized by painting turbines with a white non-reflective color. An Aircraft Detection Lighting System (ADLS) will be utilized to minimize visibility of aircraft warning lights during nighttime. The Project will also minimize visual impacts through vegetative screening at the operation and maintenance building and substation locations. The Project is committed to refining the vegetative screening plan prior to construction through coordination with a landscaping company to determine availability of species as well as which species and vegetation types would be the most suitable and effective at screening the proposed infrastructure from the adjacent county road. Other adjacent uses are limited to farmland and are not anticipated to be impacted visually by the operation and maintenance building or substation either because of existing vegetation providing visual screening or because of a lack of proximity to the proposed infrastructure. The closest occupied dwelling is located approximately 1,344 feet to the southwest of the proposed substation. Refer to Sheets 9 and 65 of **Appendix 1.1-A – Project Layout within Exhibit A-1.1** for the location of the proposed vegetative screening and options being considered by the project for planting respectively. Any additional mitigation to address potential visual impacts will be assessed and addressed on a case-by-case basis through the complaint resolution process.

The proposed Project will maintain the low-density character of the region and avoid adverse effects on surface drainage through comprehensive stormwater management measures,

preventing changes to run-off to neighboring properties. The inclusion of traffic management strategies during construction and minimal operational traffic post-construction will ensure compatibility with the area's infrastructure. Overall, the Project has been designed to align with and complement the surrounding land uses, preserving the community's character while protecting the health, safety, and welfare of nearby residents and stakeholders.

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

The proposed Project is not a solar facility and thus does not require a plan to establish and maintain pollinator habitat and vegetative ground cover for the life of the proposed facility. Typical ground cover restoration will occur once construction is complete and regular farming operations and land uses can resume.

i. Describe the plan to meet or exceed pollinator standards throughout the lifetime of the proposed facility as established by the "Michigan Pollinator Habitat Planning Scorecard for Solar Sites" developed by the Michigan State University Department of Entomology in effect on February 27, 2024, or any applicable successor standards approved by the Commission.

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

The proposed Project is not a solar facility and thus the pollinator planting standards for approval in Exhibit A-1.3.a.5.i-ii do not apply.

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

The Project will include perimeter security fencing that meets the requirements of the National Electric Code installed around the proposed substation. All access doors to wind turbines will be lockable and will not be climbable on the exterior. Construction, installation and permitting of the switchyard will be conducted by a separate entity. Refer to **Appendix 1.1-A – Project Layout** within **Exhibit A-1.1**.