

DECATURY BATTERY ENERGY STORAGE FACILITY

Exhibit A-1.3 EXPLANATORY INFORMATION

Table of Contents

EXHIBIT A-1.3 – EXPLANATORY INFORMATION	2
---	---



EXHIBIT A-1.3 – EXPLANATORY INFORMATION

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

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

i. Environmental and Natural Resource impacts

The Project is designed to be compatible with the natural environment and will be constructed, operated, and maintained to not adversely affect the natural environment. The Applicant is committed to minimizing alteration of the natural environment to the greatest extent plausible by protecting environmentally sensitive areas, such as wetlands, steep slopes, and areas subject to flooding.

The Project will not impact the water quality or water supply in the area. BESS facilities are designed to contain and prevent any internal battery materials from reaching the ground or groundwater. The Project is designed such that post-construction stormwater flows will not materially exceed pre-construction flow. As such, the Project is unlikely to affect groundwater and drainage. Implementation of a Soil Erosion and Sedimentation Control Plan and best management practices (BMPs) will minimize adverse effects on soil and water quality during construction and operation. 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.

Field investigations were completed to identify, delineate, and characterize wetlands, assess streams, evaluate the presence of floodplains, and determine the likely regulatory status of the identified water resources. The Project was assessed in accordance with current Michigan regulations and jurisdiction was evaluated following the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended. EGLE regulated features were not identified within the proposed Project Area. In the event that there are proposed impacts to state regulated floodplains and/or EGLE regulated wetlands, a Part 303, 301 and/or 31 permit would likely be required by EGLE for dredge and fill activities within regulated features. The Project will obtain all necessary EGLE permits prior to impacting regulated features requiring a permit. The Project will also prevent effects to nearby natural environment features by implementing design measures such as developing drainage measures to minimize storm water impacts.

Desktop and field investigations were completed in the fall of 2024 to assess the Project Area for potential habitat of threatened and endangered species (TES). Additionally, coordination with U.S. Fish and Wildlife Service (USFWS), consistent with the Michigan Endangered Species Determination Key (Michigan DKey), was conducted in November 2024 to determine the necessary conservation measures to avoid adverse effects to listed species. A wetland delineation was also conducted in the fall of 2024 and concluded that no wetlands, watercourses, or

waterbodies were present on site. Therefore, minimal impacts to TES habitat and waterways are expected as a result of the proposed Project.

Operation of a BESS facility will not generate emissions, smoke, fumes, or odors. The proposed Project will not generate liquids or other waste, solid or hazardous, that is detrimental to health, safety, or general welfare. As such, the Project will not disturb or be hazardous to any surrounding uses permitted within the adjacent zoning districts or produce any hazardous by-products. Furthermore, at the end of its operational life, the Project will be decommissioned so the land may be returned to its current use.

The materials used in BESS facilities maintain value after more than 20 years of use and many battery manufacturers offer to reclaim and recycle lithium-ion batteries. The materials extracted during recycling can be used in a wide variety of consumer products such as lubricating grease, concrete additives, and some glass products. The Applicant requires that vendors provide recycling certificates to ensure all applicable regulations are followed in the recycling and disposal of BESS related equipment. Further, The Applicant will follow the requirements for the disposal of lithium-ion batteries found in Part 273 of Title 40 Code of Federal Regulations.

ii. Noise

The Project will implement multiple sound mitigation techniques to reduce noise. The Applicant is in the process of reviewing which measures to implement that will most effectively mitigate noise generated by the Project. These mitigation measures may include but are not limited to: reducing fan speeds or programming them to run only at certain times of operation, including a noise attenuation kit (also referred to as a silencer) on each inverter to reduce sound pressure and sound power, and lastly, installing a sound mitigation barrier to ensure sound levels are compliant with MPSC noise regulations. Refer to the Sound Report in **Appendix 1.7-A**.

iii. Visual impacts

The Project will maintain the area's agricultural character and visual appeal through design features like setbacks, perimeter fencing, and existing vegetative buffering. The BESS facility will be buffered from public rights-of-way and neighboring properties using existing vegetation to preserve the township's rural aesthetic. Visual paths from nearby residences to the Project infrastructure are not anticipated. Refer to the Site Plan in **Appendix 1.1-A**.

iv. Impacts to traffic

The expected traffic generated by the Project will be safely and efficiently accommodated by the existing capacity of the street system. Construction of the Project will be conducted using current street and highway infrastructure. The Project does not include any new public roadways and the BESS facility components will be set back from public road rights-of-way. Transportation and installation of the Project's components are unlikely to require special accommodations of existing infrastructure.

Prior to Project construction, The Applicant will consult with the Decatur County Road Commission regarding workforce and component delivery routes to obtain any necessary approvals and, if requested, The Applicant will enter into a Road Use Agreement. If the Decatur County Road Commission does not require a Road Use Agreement, The Applicant will continue to coordinate with the 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

The proposed Project will not generate waste, solid or hazardous, that is detrimental to health, safety, or general welfare. The Project will not require public solid waste management or municipal waste disposal services.

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. A permanent stormwater basin at the BESS facility will help maintain post-construction stormwater flows at pre-construction levels, protecting groundwater and drainage. The Applicant's comprehensive stormwater assessment outlines mitigation measures to manage any potential drainage impacts. Above-ground infrastructure will be set back from any county drain rights-of-way. If deemed necessary, a crossing permit will be obtained from the Van Buren County Drain Commissioner. Refer to the Site Plan in **Appendix 1.1-A** for the locations of the proposed basin.

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

The Project is designed and will be constructed, operated, and maintained to prevent adversely affecting neighboring lands. The Project will preserve the agricultural character and visual appearance of the area by maintaining adequate setbacks and employing design measures to preserve the viewshed and rural character of adjacent non-participating properties, such as perimeter fencing and landscape buffering measures. Additionally, portions of the Project Area outside of the fenced BESS facility may be utilized to continue farming or other agricultural uses.

The Project will not create any hazardous or disturbing impacts on neighboring uses. The Project will implement multiple sound mitigation techniques to reduce noise. Additionally, the Project will maintain the area's low density and will not increase area road traffic once constructed. 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.

The Project security fencing and 24/7 monitoring prevents unlawful trespass and adverse effects on neighboring lands. Years of research has proven the safety and efficiency of lithium-ion technology, a technology similar to that found in laptop computers, tablets, and other electronic devices. Detailed safety management measures will be used to prevent fires and explosions, provide proper temperature control for safe battery operation, and detect safety hazards.

Each lithium-ion battery container will be equipped with smoke and fire detection systems, thermal runaway prevention, and explosion control, that comply with applicable National Fire Protection Association (NFPA) standards. The Project complies with all Federal Energy Regulatory Commission interconnection standards. All components of the Project have been designed to comply with the National Electric Safety Code (NESC), National Electric Code (NEC), and/or Institute of Electrical and Electronics Engineers (IEEE) standards or guidelines. The Applicant will notify the local fire department and emergency services prior to construction so that they can visit the Project during construction to obtain an on-the-ground understanding of the Project layout and access points, and protocols in place.

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

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

The proposed Project Area is approximately 8.9 acres.

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

The Project is located in Decatur Township, Van Buren County, Michigan. A portion of the proposed access road is located within the Village of Decatur municipal boundary. The Project is located approximately 0.1 miles west of the intersection of East South Street and South George Street. The Project will be located on the western portion of the parcel surrounded by wood lots and not visible from the street or by adjacent landowners.

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 designed and will be constructed, operated, and maintained to ensure compatibility with the predominantly existing land uses within a 1,000-foot perimeter, which include transmission lines, a substation, woodlots, farmland, residential housing, and a church. A qualitative assessment of nearby land uses has been conducted confirming that the proposed Project is compatible with these uses and will not generate adverse impacts.

The Project is not expected to impact the church, as sound mitigation measures, setbacks, and vegetative buffering will minimize noise and visual disturbances. Additionally, the facility's operation will not increase traffic or cause other disruptions to nearby community or civic facilities. The nearest school, located more than 2,640 feet from the site, is outside the immediate area of potential effects from noise or visual impacts, ensuring continued harmony with educational activities.

Surrounding woodlots and farmland will be preserved to the greatest extent possible, with portions of the Project Area potentially available for continued agricultural use outside of the active operational footprint. Residential housing in proximity to the Project will benefit from design measures such as setbacks, vegetative buffering, and sound mitigation, ensuring that the Project does not disturb the rural and residential character of the area.

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 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 Project will be appropriately screened by existing woodlot vegetation to buffer the BESS facility from adjacent land uses. Following construction, typical reseeding and planting of disturbed areas will occur. Refer to the Seeding and Planting Plan included with the Site Plan in **Appendix 1.1-A**.

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.

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 is designed with perimeter security fencing that meets the requirements of the National Electric Code. The seven-foot-tall security fence with one foot of barbed wire on top will be installed on the perimeter of the BESS facility and all access points to prevent unauthorized access and potential harm to an individual. Including the barbed wire, the total height of the fence is eight feet, which complies with federal regulations. Refer to the Site Plan in **Appendix 1.1-A**.