

Appendix F
Alternative Site Analysis



Lakeside Solar – Alternative Site Analysis

In accordance with Section 225(1)(n) of Public Act 233 of 2023 (MCL 460.1225(1)(n)), Lakeside Solar considered alternative development locations for the Lakeside Solar Project. Below is a summary of the Chemours Montague site and an explanation of why Lakeside Solar determined the Chemours Montague site was not suitable for the Project.

Site History

The Chemours Montague site, a former chemical manufacturing facility, is located in Muskegon County, Michigan, approximately two miles southwest of the city of Montague. The plant property consists of approximately 1,330 acres and is bounded by forested, agricultural, residential, and former industrial properties. The property to the east is owned by Occidental Chemical Company (Oxychem). The former operating part of the facility is located about one mile north of White Lake and 1.5 miles east of Lake Michigan.

Regulatory Factors

The Montague facility site is subject to corrective action under Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), and its administrative rules.

Corrective action has been performed at the facility under the regulatory review of the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Waste and Hazardous Materials Division. The site investigations have been completed in accordance with the protection standards and relevant processes of EGLE under Part 201 of NREPA to meet the corrective action obligations under Part 111 of NREPA with EGLE providing oversight, as necessary.

Additional details of the project chronology and key site history are provided in the Corrective Measures Study Work Plan, created by AECOM on behalf of The Chemours Company (Chemours) for the Chemours Montague facility. The Corrective Measures Study Work Plan (Plan) details the proposed approach to complete the remedy selection process for former waste management units and areas of concern at the Chemours Montague site.

Corrective Actions

According to public records, the site is currently undergoing a corrective action plan through EGLE dated July 8, 2024. Compliance is ongoing as to contamination removal, ground water monitoring, etc. No disturbance of soil or vegetation is permitted through the duration of environmental impact studies that are currently underway, the results of which will be used to determine a proposed remediation plan.

Lakeside Solar also understands that all successors to the site shall be bound by the valid consent order, and Chemours must ensure that all institutional controls that are or may be required will be implemented and maintained. Soil disturbance should be limited, especially in areas identified by the Plan, such as the landfill locations, the neoprene disposal area, rail car unloading areas, basin sludge areas and the impacted soil from the copper catalyst release, the size of which still needs to be determined.

Siting Considerations

Final site selection for the Lakeside Solar Project was dependent upon environmental, financial, and logistical aspects. After consideration of these factors, Lakeside Solar determined the Chemours Montague site was not suitable for the Project (as outlined below):

- Specific environmental factors that were considered include ecological risk assessments, soil boring logs indicating unfavorable soil conditions due to contamination, surface elevation, and groundwater depth measurements/risk of seepage. Ecological risk assessments found that the water table where the site is located is too shallow for beams to be driven for solar (5'-10'), and racking would need to be above ground only.
- The avoidance areas at the site, which would be avoided through site design, would make development of complete array blocks difficult, culminating in a fragmented, inefficient project. Over 200 acres of trees would need to be removed to clear enough land to construct a utility scale solar development
- Geotechnical studies, necessary to determine soil suitability, have not been conducted by the owner of the property or by any environmental regulatory agencies. Soil disturbance is currently prohibited due to the corrective measures the site is undergoing.
- Financial considerations include the restrictive covenants currently in place on the property that would pose a constraint to development. Additionally, the site's history results in an inability to get insurance for a solar development project in the location. Quotes to sufficiently insure the site are prohibitively high, such that, in addition to increased expense to properly build on the site, would price a potential solar project out of a competitive market.
- Logistic constraints were a final determinant. While White River Township worked with Chemours on placement of the renewable energy overlay district, Geronimo Power had several conversations with the Property owner, the records of which are limited by an NDA beyond what is provided in this document. These discussions resulted in the determination that the land available for development of a solar energy generation facility at the Chemours-Dupont Montague site would be enough to generate about 20 Megawatts (MW) or less of power, far below the target MW necessary to make the Lakeside Solar Project viable.
- Limiting the available space also affects the marketability of the solar resource, as there is a limited market for the amount of power that would be produced by the 20MW project possible on the available space at the Chemours site. Conversely, Lakeside Solar was able to connect with interested landowners willing to lease property outside of the Chemours Montague facility site where the constraints discussed above are not a factor.

Conclusion

In consideration of the above factors, Lakeside Solar — in consultation with representatives of Chemours-Dupont and technical consultants — determined the Chemours-Dupont site was unsuitable for construction of the Lakeside Solar Project. Alternatively, Lakeside Solar was able to connect with landowners, with land outside of the Chemours Montague site that was not restricted by the above factors, that were interested in voluntarily participating in the Project. As a result, Lakeside Solar determined the best location suited for the development of the Project was the land located in its proposed site plan.

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