



November 21, 2025

Kane County
Kane County Government
719 S. Batavia Ave,
Building A, 4th Floor,
Geneva, IL 60134

Attn: Natalie Zine
Kane County Zoning Planner
zinenatalie@kanecountyil.gov

RE: Tri-County Solar LLC Special Use Permit Application

Good afternoon!

I am pleased to write this letter to Kane County regarding the Special Use Permit Application for the Tri-County Solar project. We, Tri-County Solar LLC, are owned 100% by GSI Development Corp. and are proposing the development of a 5MW-AC community solar facility situated in Kane County, unincorporated St. Charles township. The facility **does not** go against any County laws. The proposed property is currently within the Farming District with a land use classification of Special Use (SU) Superfund Landfill site. Per Chapter 25 of the Kane County Zoning Ordinances, commercial solar farms are allowed to be permitted within the Farming District. We are requesting a Board Hearing before the Planning and Zoning Board for January 6th, 2026.

Project location

- 7N904 IL Route 25, Elgin, IL 60177
- Waste Management Landfill Site, unincorporated Kane County
- Solar Project location Tax ID: 09-01-200-017

Project Package Application

Enclosed with this application, you will find all requirements for the Planning/Zoning Board to review for Siting Approval. These documents will include:

1. Special Use Permit Application – As listed in APPENDIX D: REQUIRED SUBMITTAL DOCUMENTS
2. Submittal shall include twelve copies of the Special Use application to the County, and at least one copy in electronic format.

We will issue a public statement and notify abutting property owners via certified mail when the public hearing takes place. Please let me know if you have any questions about the project before the public hearing and if we could get it scheduled on the requested dates.

We, Tri-County Solar LLC, are looking forward to working with your community!



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New York, New York 10016



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EXECUTIVE SUMMARY

Tri-County Solar LLC proposes to develop the Tri-County Solar facility, a 5 MW-AC community solar project utilizing approximately 25.5 acres of land within a 40-acre fenced area in unincorporated St. Charels Township, Kane County. The Tri-County Solar community solar project (the “Solar Project”) will be contained within one parcel of land, 09-01-200-017, located at the federally classified Superfund Site on 7N904 Illinois Route 25, Elgin, IL 60120. We entered an option to purchase agreement with the landowner, TRI COUNTY LANDFILL COMPANY INC., to lease the parcel for solar access. (See 05_Plat of Survey/ALTA Land Title Survey). Tri-County Solar is part of Tri-County Solar LLC (the “Applicant”), a limited liability company owned by GSI Development Corp, previously known as Saturn Power Corp.

The proposed project area currently lies within the Farming District with special use. This application is submitted by the Applicant pursuant to and in compliance with the requirements set forth under Chapter 25 of the Kane County Zoning Ordinances, to allow the use of the premises for a 5 MW-AC Community Solar Facility. In addition, the project application is pursuant to and in compliance with the requirements set forth under Public Act 102-1123 set forth by the State of Illinois. The Applicant believes to have gathered all the necessary information to present to Kane County with a complete application.



Tri-County Solar LLC

5 MW-AC Community Solar Project Narrative Special Use Permit Application

Tri-County Solar LLC
c/o GSI Development Corp.

Attn: Ralph Meima | Sr. Project Developer
14 Erb Street W.,
Waterloo, Ontario, Canada N3A 2P7
(p) 802-380-1029
rmeima@greenwoodinfra.com

Prepared by: James Carlin | Project Development Associate
Reviewed by: Raquel Reyes | Sr. Project Developer

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APPENDIX

GENERAL DOCUMENTATION

- 01_Kane County Zoning Application (11-18-2025)
- 02_Standards of a Special Use Permit Worksheet (11-11-2025)
- 03_Project Narrative (11-20-2025)
- 04_Purchase Contract (11-12-2025)
- 05_Platform of Survey/ALTA Land Title Survey (10-28-2025)
- 06_Solar Equipment Manufacturer Specs (COMBINE INTO SINGLE PDF)
- 07_Noise Analysis (10-14-2025)
- 08-Decommissioning Plan (10-17-2025)
- 09-Decommissioning Surety Draft
- ~~10_Waiver of Setback Requirements (if applicable)~~
- 11_Traffic Study (11-11-2025) (Optional)
- 12_Glare Study (10-14-2025) (Optional)

PUBLIC NOTICE REQUIREMENTS

- 13_Legal Description (WORD DOC)
- 14_List of Adjacent Property Owners
- 15_Certification of Notice to Adjacent Property Owners
- 16_Copy of Notice Letter from Petitioner

PROPOSED PLANS

- 17_Geometric Site Plan (11-14-2025)
- 18_Landscape & Screening Plan (11-03-2025)
- ~~19_Photometric Plan (00-00-0000) (if applicable)~~

ENVIRONMENTAL REVIEW

- 20.1_EcoCat Report & Consultation Letter (08-29-2025)
- 20.2_Blanding Turtle Plan (10-02-2025)
- 20.3_Pollinator Friendly Habitat Plan (11-20-2025)

- 21_SHPO Letter (10-30-2025)
- 22_NRI Report (09-26-2025)
- 23.1_USFWS Letter (09-28-2025)
- 23.2_Protected Species Screening (09-30-2025)
- 24_US Army Corp Letter of No Objection (11-20-2025)
- 25_Executed AIMA Agreement (10-02-2025)
- 26_Avoidance of Protected Lands Map (11-10-2025)
- 27_Roadway Jurisdiction Approval Letter (11-20-2025)
- 28_Structural Engineer's Certificate (11-18-2025)
- 29_FEMA 100-Year Floodplain Map (04-17-2025)
- 30_Level 1 Wetland Investigation (08-25-2025)
- 31_Topographical Map (04-17-2024)
- 32_Preliminary Farmland Drain Tile Investigation (11-12-2025)
- 33_Preliminary Stormwater Management Report (11-18-2025)
- 34_Phase 1 Environmental Assessment (04-04-2025)

1. SUMMARY OF APPLICATION

The Applicant is petitioning for a Special Use Permit (SUP) for developing and constructing a 5 MW-AC community solar facility according to and in compliance with the requirements set forth under Chapter 25 of the Kane County Zoning Ordinances Subsection 5-4-9: COMMERCIAL SOLAR ENERGY FACILITIES, and Public Act 102-1123 set by the State of Illinois.

The Applicant has an executed interconnection agreement with Commonwealth Edison Company (ComEd) dated December 6, 2024. To demonstrate our sustained commitment to the project, the Applicant would like to submit this application to the Illinois Shines program in order to obtain a Master REC Agreement with the applicable utility to ensure that residents get the accessibility to the energy generated at the facility. In order to qualify for the traditional community solar Illinois Shines category, the project must receive a land use permit or an equivalent to the special use permit. Upon receiving the Special Use Permit from Kane County, the Applicant forecasts receiving a REC agreement by the summer of 2026.

Figure 1– Figure of Tri-County Solar Array Layout

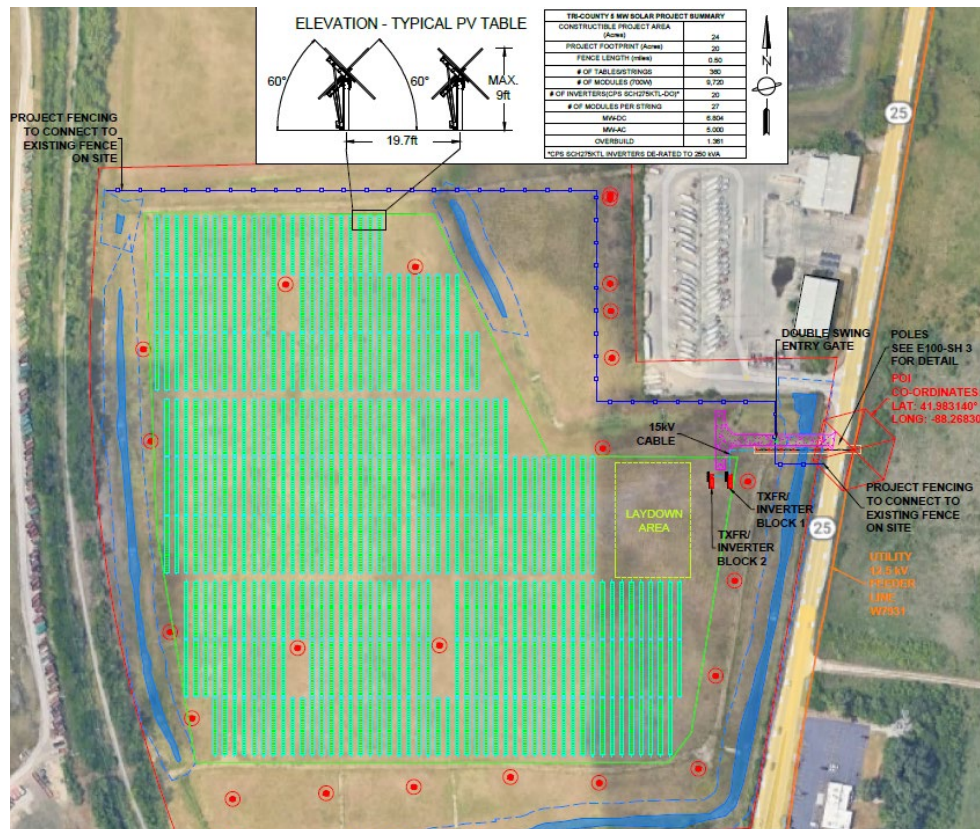
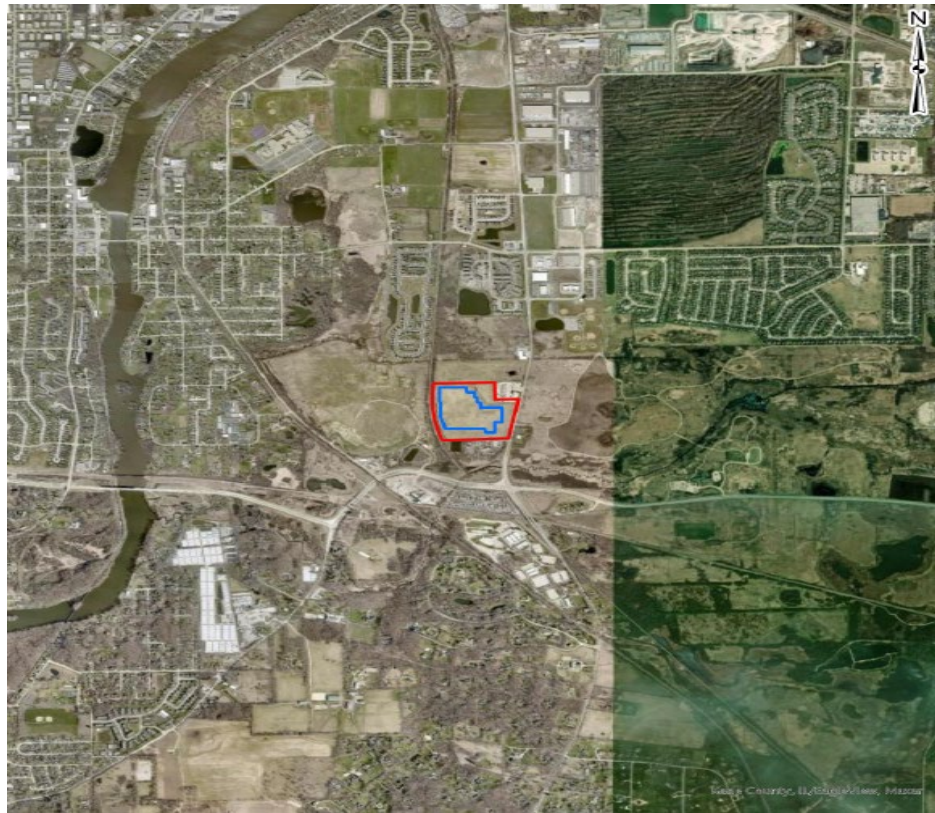


Figure 2– Areal Map of Tri-County Project Location



1.1. PROJECT PROFILE

Project Name: Tri-County Solar LLC

Project Address: Superfund Landfill site adjacent to 7N904 Illinois Route 25 Elgin, IL, 60120

Project Location: Unincorporated St. Charles Township, Kane County

Authority Having Jurisdiction (AHJ): Kane County, IL

Project Nameplate capacity (size): 5MW-AC Community Solar Farm

Project Developer: Tri-County Solar LLC

Project Developer Address: 14 Erb Street, Waterloo, ON, Canada N3A 2P7

Contact Name(s): Ralph Meima, Raquel Reyes and James Carlin

Contact Phone(s): 802-380-1029 | 226-338-7958 | 779-809-1070

Developer Email(s): rmeima@greenwoodinfra.com | rreyes@greenwoodinfra.com | jcarlin@greenwoodinfra.com

Project Scope: The Tri-County Solar Project is designed to be a solar photovoltaic (PV) project. It will be built over sections of an underutilized vacant lot that can support the PV arrays. Energy generated from PV modules will be converted to alternative current (AC) power on site and injected onto the power grid for stability and lower electrical bill rates for community subscribers. The Tri-County Solar Project will also be proposing partnership agreements with local contractors to perform engineering, procurement and construction for the facility, as well as donation agreements with organizations within Kane County to promote community economic development, biodiversity, and scholarships for the younger generation.

1.2. APPLICANT INFORMATION

Tri-County Solar LLC
c/o GSI Development Corp.
14 Erb Street West, Suite 1003
Waterloo, Ontario Canada N2L 1S7

Attn: James Carlin | Project Development Associate
(cell) 779-809-0170
jcarlin@greenwoodinfra.com

2. COMPANY OVERVIEW

GSI Development Corp., previously known as Saturn Power Corp., was born from the vision of two farmers in 2007. Their cumulative experience and history have provided the company with a unique understanding of the needs of farming communities while entrenching the value of hard work into its internal culture. As of April 2023, Saturn Power joined the Greenwood Sustainable Infrastructure (GSI) group and rebranded itself to GSI Development Corp.

GSI is an independent power producer based in New York City, New York with offices in Baden, Ontario, Canada. GSI was established in 2010 and has developed approximately 388 MW across 71 renewable energy projects, many of which are still owned and operated by GSI. GSI's project footprint consists of 11 U.S. states, which include New York, Massachusetts, Vermont, Florida, Minnesota, Michigan, Colorado, Illinois, New Mexico, Pennsylvania, and Washington, as well as Alberta in Canada.

GSI supports the development of sustainable energy infrastructure by collaborating with communities, governments, and commercial and industrial businesses to ensure that each project is both financially viable and environmentally sustainable over the long term.

2.1. PROJECT DESCRIPTION

The 5 MW-AC Tri-County Solar project will be utilizing approximately 25.5 acres of land for the solar array, 40-acres of fenced area, all contained within one parcel in unincorporated St. Charles Township, Kane County.

The Tri-County Solar Project will consist of photovoltaic solar panels ground-ballasted in a north-south configuration. The solar panels will be supported through a ballast system that will hold on to the panels'

weight. For this solar project, no ground penetration will be proposed, as the current site is classified as a Superfund Landfill site by the US EPA. Tri-County Solar LLC will be legally accountable to the existing environmental covenant of this site and will not perform any intrusive or penetrating construction work that would hinder the integrity of the landfill cap and gas ventilating system. This would make the installation of the community solar system efficient without the need for drilling, digging, or anchoring the ground. Furthermore, its flexibility allows for easy adjustments, removal, or relocation to suit growing needs.

The Project's equipment is projected to utilize inverters and skidded string MV station from Chint Power Systems (CPS) America, a leadership in engineering and supplier for commercial, industrial, and utility-scale projects. The equipment from CPS is environmentally friendly through its commitment to green energy solutions, sustainable manufacturing practices, and development of eco-friendly products like those using ester oil for transformers. They have received recognition for its efforts with some factories being named, "National Green Factories" and its products earning awards for eco-friendly and non-toxic technology.

Canadian Solar is to supply the solar panel modules. These are excellent for higher energy yield with low power degradation. The company was recognized as the number one module supplier for quality and performance ratio. The modules are made from non-toxic materials. The cell type is TOPCon cell, with anodized aluminum alloy as its frame, and has a heat strengthened glass with anti-reflective coating. TOPCon is short for "Tunnel Oxide Passivated Contact," an advanced solar cell technology that utilizes a n-type silicon base to enhance efficiency and performance. Unlike traditional p-type silicon solar cells, TOPCon cells employ n-type silicon doping, which offers several advantages. At the core of a TOPCon cell is a sophisticated cell structure designed to minimize electrical losses and improve light absorption. Given that they are primarily made of silicon, this is non-toxic and is considered environmentally friendly. The anodized aluminum alloy is safe as it creates a hard, non-reactive, protective layer that prevents aluminum from leaking.

Lastly, Polar Racking is forecasted to supply the single-axis tracker for the modules on the ballasted system. Polar has been an industry leader in solar mounting solutions since 2009. All components will comply with the current edition of the National Electric Code and the applicable International Code Council for building codes.

Ballasted systems are noninvasive, avoiding any penetration of the installation surface, which minimizes risks like water leakage, corrosion, or structural damage. They offer added insulation and protection, enhancing energy efficiency by limiting heat transfer. Moreover, maintenance is also minimal. Operation and maintenance would have to be completed periodically to check the ballast weights, alignments, and keep the panels clean from dust and debris.

Based on the latest electrical design for the Tri-County Solar LLC project, it is expected to install 9,720 modules of 700W, maximum tilt of 60 degrees, and a total height of 9 feet. The Project will install two transformer blocks with sound proofing walls, and 20 inverters throughout the facility.

All facility equipment will be contained within an animal friendly fence with a locked gate. Utility-controlled interconnection poles will convey the generated electricity overhead onto the point of

interconnection with the grid. Any electrical wires that are requested or required to be underground will be located in areas outside the landfill cap and gas vents.

The solar project can employ up to 50 local construction and installation workers on the project at any given time and will provide ongoing, positive economic benefits to the local community over the life-duration of the project. As a community solar project, residents from St. Charles township, Village of Bartlett, South Elgin, and businesses will have an opportunity to subscribe to the project to reduce their overall electric bills.

2.1.1. RATIONALE AND INTERCONNECTION

A successful community solar project requires both interconnection and siting approval. Tri-County Solar LLC already has an interconnection agreement with ComEd and will meet all necessary conditions for Board approval. According to ComEd, the interconnection for Tri-County Solar is quite simple as we would be tapping into the 12.45kV W7931 distribution line headed towards the TSS79 Substation. Tri-County Solar will be supporting the utility upgrades to the local distribution lines and substations to increase energy efficiency in the nearby community and those who rely on the existing power line infrastructure. Tri-County Solar will provide renewable energy credits to nearby residents and business owners who subscribe to the energy system and could potentially receive a discount of up to 20% on their electricity bills.

The Tri-County Solar project is located within the proposed project area due to interconnection availability, near a community hub for residents to subscribe to the system, redeveloping an undeveloped landfill that has been deemed unfit for other land uses, and low to no impact on environmental aspects.

2.2. PROJECT BENEFITS

Donation Agreements: The Tri-County Solar Project is offering to negotiate donation benefit agreements with nearby non-profits and organizations that can include commercial terms supporting local economic development and community programs throughout the project lifetime. Tri-County Solar LLC is currently under agreement reviews with two local organizations. Upon execution of the agreement, the Project will disclose the names of these organizations that will be driving economic benefit to the Elgin community.

Long-term tax revenue: Tri-County Solar is a 5-megawatt alternating current (“MW”) community solar powered-electric generation facility that will utilize photovoltaic (“PV”) panels installed on a single-axis tracking system. Through construction and operation, Tri-County Solar will contribute to the local economy and improve American energy security. Solar projects increase the property tax base of a county, creating new revenue sources for education and other local government services such as fire protection, libraries, and road maintenance. The largest tax revenue contributions will be disbursed to school districts, fire districts, park districts, and county governments. The total estimated property taxes paid over the 35-year life of the Tri-County Solar Project is estimated to be \$521,107.

Figure 3– Total Property Taxes Paid by the Tri-County Solar Project Over 35 Years

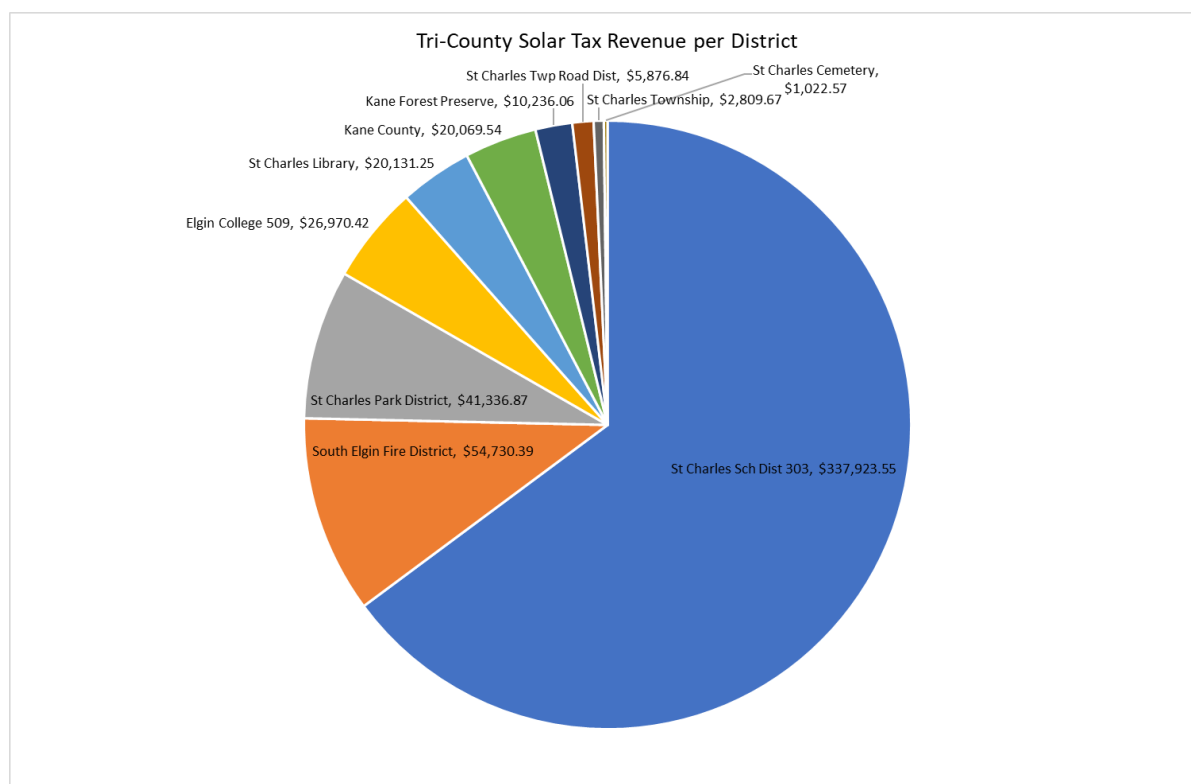
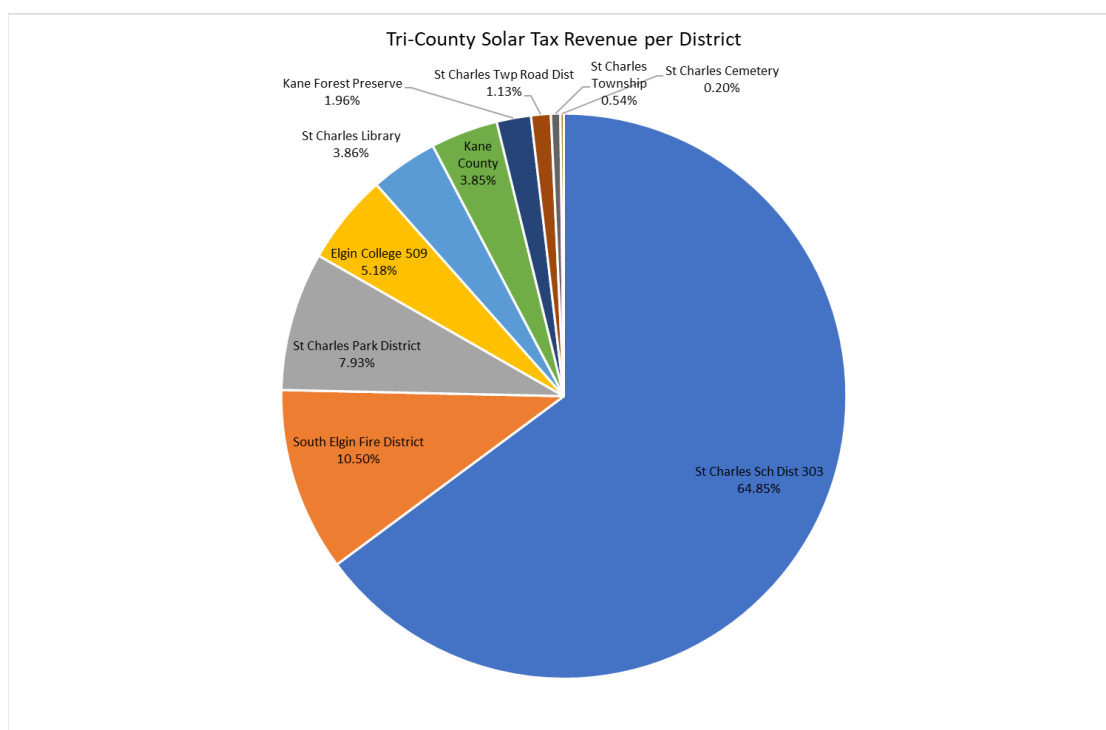


Figure 4– Percentages of Property Taxes Paid to Taxing Jurisdictions Over 35 Years



Local Economy: Tri-County Solar LLC intends to maximize its local economic impact. The Tri-County Solar Project is estimated to create over 50 new local jobs during construction, and an estimated 5 new local long-term jobs will be created. Direct construction and operations and maintenance of jobs require highly skilled workers in the fields of construction, management, and engineering. Renewable energy projects diversify the country's energy sources and increase the supply of reliable, domestic energy.

Land Preservation and repurpose of unusable land: Solar projects are a low-impact, temporary use of land that preserves the land's value and soil health for future generations. The Tri-County Solar Project will be preserving farmland by proposing the development of a community solar project on a capped landfill site instead of the standard solar facility location, on agricultural lands. The USEPA has determined that this site cannot be used for agricultural, residential, commercial, or business development. There are limited available uses for this site classification due to the landfill cap. The site has undergone 25 years of remediation conducted by Waste Management Illinois. Once development has been completed, the project will be considered a "brightfield" solar project as it will turn the site into a productive asset. Redeveloping a brownfield for a solar project often involves remediation, leading to a cleaner and safer site, which in turn improves local environmental quality and protects surrounding areas from potential contamination from the idle site.

Pollinator Friendly Habitat Plan: As part of remediation, Tri-County Solar LLC is committed to implementing a pollinator friendly habitat plan to ensure long-term environmental sustainability on the site. The site will be planted with a native pollinator mix to achieve and maintain Pollinator Friendly status as defined in the Illinois Pollinator Friendly Solar Site Act (525 ILCS 55/).

3.0 SITING

This section will cover the Solar Project's ordinance requirements, performance standards, description, selection process and explain existing conditions of the proposed project site.

3.1 ORDINANCE REQUIREMENTS

The Solar Project was designed to meet the required detailed in the Zoning Ordinance on Commercial Solar Energy Facilities. Kane County has laid out application procedures, to which Tri-County Solar will comply with. As noted above, the Project will consist of roughly 25.5 contiguous acres with a roughly 40-acre fenced area sited on Special Use land in Kane County.

Upon acceptance into the Illinois Shines Program as a Traditional Community Solar Project, the Applicant will be held responsible for complying with the Illinois Shines State requirements and complying with program rules. Additionally, the Applicant will not construct the solar facility until a Building Permit has been issued by Kane County.

Tri-County Solar LLC has submitted the following items set in the Special Use Application required documents, as set forth under Chapter 25 of the Kane County Zoning Ordinances subsection 5-4-9: COMMERCIAL SOLAR ENERGY FACILITIES.

- 1) A Commercial Solar Energy Facility Summary, including, to the extent available:

- a) A general description of the project, including: A description of the Applicant, Owner and Operator, including their respective business structures;
 - a) RESPONSE: Attached to this Project Narrative.**
- 2) The name(s), address(es), and phone number(s) of the Applicant(s), Owner and Operator, and all property owner(s), if known, and documentation demonstrating land ownership or legal control of the property;
 - a) RESPONSE: Attached to this Project Narrative.**
- 3) A site plan for the Commercial Solar Energy Facility showing the planned location of solar panels, including legal descriptions for each site, Participating and Non-participating Residences, Occupied Community Buildings, parcel boundary lines (including identification of adjoining properties), setback lines, public access roads and turnout locations, Substation(s), operations and maintenance buildings, electrical cabling to the Substation(s), ancillary equipment, third party transmission lines, the location of any wetlands, flood plain, drainage structures including surface ditches and subsurface drainage lines, underground mines, scenic and natural areas within one thousand five hundred (1,500) feet of the proposed Commercial Solar Energy Facility, and the layout of all structures within the geographical boundaries of any applicable setback;
 - a) RESPONSE: Attached to this Application.**
- 4) A proposed Decommissioning Plan for the Commercial Solar Energy Facility;
 - a) RESPONSE: Attached to this Application.**
- 5) All required studies, reports, certifications, and approvals demonstrating compliance with the provisions of this division;
 - a) RESPONSE: Attached to this Application.**
- 6) An Agricultural Impact Mitigation Agreement (AIMA) executed between the Applicant and the Illinois Department of Agriculture;
 - a) RESPONSE: Attached to this Application.**
- 7) The topographic map shall include the Commercial Solar Energy Facility site and the surrounding area;
 - a) RESPONSE: Attached to this Application.**
- 8) Any other information normally required by the County as part of its permitting requirements for siting and construction of buildings or other structures including conformance with Chapter 9 Stormwater Management;
 - a) RESPONSE: Attached to this Application.**
- 9) Waivers from the setback requirements executed by the occupied community building owners and/or the non-participating property owners bearing a file stamp from the County Recorder of Deeds Office confirming that the waiver was recorded against title to the affected real property;
 - a) RESPONSE: Not required for this Application**
- 10) Results and recommendations from the Illinois Dept. of Natural Resources obtained through the Ecological Compliance Assessment Tool or a comparable successor tool;
 - a) RESPONSE: Attached to this Application.**
- 11) Results of any United States Fish and Wildlife Service's Information for Planning and Consulting environmental review or a comparable successor tool that is consistent with any applicable United States Fish and Wildlife Service's solar wildlife guidelines;
 - a) RESPONSE: Attached to this Application.**
- 12) Information demonstrating that the Commercial Solar Energy Facility will avoid protected lands.

a) RESPONSE: Attached to this Application.

- 13) Any other information requested by the County or the County consultants that is necessary to evaluate the siting application and operation of the Commercial Solar Energy Facility and to demonstrate that the Commercial Solar Energy Facility meets each of the regulations in this division, including the Special Use standards set forth below.

a) RESPONSE: To be provided upon received comments from the County liaison.

- 14) Material changes to the application are not permitted once the notice of the public hearing has been published, unless requested or permitted by the County; and

a) RESPONSE: No material changes have been proposed to this Project yet. If any, in the future, the Applicant will provide written confirmation of such changes.

- 15) The Applicant shall submit twelve (12) copies of the Special Use application to the County, and at least one (1) copy in electronic format.

a) RESPONSE: Attached to this Application.

3.2 SITE DESCRIPTION AND SITING

As mentioned above, the Tri-County Solar Project will produce up to 5 MW-ac of clean, renewable energy, all of which will be generated in Kane County. The Project will utilize existing infrastructure from ComEd Illinois to connecting to the electric grid, stabilizing the capacity of the distribution lines, and offering reduced electric costs to residents, neighborhoods, and businesses in the surrounding area.

3.2.1 Brownfield Development

Tri-County Solar is sited on a classified Superfund landfill site. This brownfield classification are properties, like landfills, that currently have or potentially have hazardous substances, pollution, or contamination that make the land unsuitable for residential or agricultural uses.

In addition to all the benefits that come with community solar, such as reduced electric rates, clean energy, jobs, property taxes and large community investment by the developer, landfill sites come with their own benefits.

After waste is dumped, landfill or brownfield sites are filled with contaminants; they require complicated permitting and can go unused for decades. Despite these issues, landfill sites are a great opportunity for solar because they repurpose unusable land to bring economic benefits to the greater community with no visible panels. This is also a novel solution for solar agricultural land use, since it does not take up prime farmland. It takes previously unusable land and creates an opportunity to give back to the community.

3.2.2 Site Selection Process

The site selection process for Tri-County Solar began in 2023. The Project is part of the Illinois Shines program, which includes community solar size projects up to 5 MW-ac. The selected site, operated as the Tri-County / Waste Management landfill, has been identified as a brownfield under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Tri-County is on the CERCLA National Priorities List, making it a priority remediation site. IL Shines highly encourages community solar projects on these sites. This designation provides additional scoring benefits in the programs Built Environment

category, allowing for additional REC credits. The site's suitability for solar development was assessed, considering factors unique to former landfill sites.

The land was evaluated for interconnection viability, as 12.45kV distribution lines are located just east of the parcel boundary. The nearby substation is less than 0.5 mile away from the project site, making the location ideal for a small community solar project.

This site is owned by a private landowner who leases to Waste Management, the site operator. Waste Management is responsible for maintenance of the closed landfill site. We negotiated with the private landowner, and they agreed to extend a memo of purchase option. Conversations with Waste Management, are ongoing and they are willing to facilitate and work with Tri-County Solar LLC throughout our project lifecycle.

3.2.3 Environmental Studies

Comprehensive environmental analyses have been completed as part of the site diligence for the Tri-County Solar Project. The Project has completed a Phase I Environmental Site Assessment, wetland delineation, archaeological and cultural resource studies, threatened and endangered species study, and natural resources & land evaluation, aviation compatibility, and noise assessment. Complete studies have been submitted along with this application for Board's review.

Phase 1 ESA: LaBella's review of historical sources indicate that the Subject Property has been developed for agricultural purposes, was later developed as a quarry and subsequently operated as a municipal landfill and has remained a capped landfill from 1981 to the present day.

Recognized environmental conditions and controlled recognized environmental conditions were identified on the subject property, specifically the engineering and institutional controls established under the Record of Decision (ROD) to manage contamination associated with historical landfilling operations. ROD is a cleanup and management plan for contaminated sites created by the EPA following an environmental investigation. This means that the Tri-County Landfill has had a formal management plan through the EPA addressing contamination. Site remediation has been ongoing over the span of 25 years; thus, it has been determined by the USEPA that the site is ready for use by a solar facility.

Wetland Delineation: In August 2025, Tri-County Solar LLC completed a Wetland and Stream Assessment Report to obtain up-to-date and accurate delineation data. Because the site is on a capped landfill, soil sampling was constrained, but wetland specialist was able to delineate one constructed ditch and four palustrine emergent (PEM) wetlands within the study area. These wetlands showed hydrophytic vegetation and wetland hydrology but did *not* exhibit clear hydric soils given the highly disturbed, reclaimed landfill substrate. This means that the soil has been so altered that normal wetland conditions cannot form.

Based on these findings, Tri-County Solar submitted a Joint Permit Application (JPA) to the U.S. Army Corps of Engineers (USACE). For regulatory coverage, the project is seeking authorization under Nationwide Permit 51 (NWP 51), appropriate because the total wetland impact is minimal. NWP 51 allows for streamlined permitting for small-scale impacts when adverse effects are no more than minimal. Tri-County expects to receive five (5) years of NWP 51 construction coverage, which is sufficient

for the project's needs. We received the NPW51 for Tri-County Solar LLC. The NWP 51 will cover the permit for both agencies, USACE and USWFS.

Archeological and Cultural Resource Study: The Project initiated consultation with Illinois State Historic Preservation Office (SHPO) in October 2025 and received clearance, as attached to our submission package. SHPO determined that no significant historic, architectural, or archaeological resources will be affected within the proposed project area.

Threatened and Endangered ("T&E") Species Study: Tri-County Solar LLC conducted an endangered resource review and habitat assessment in August 2025 using the Illinois Department of Natural Resources ("IDNR") Ecological Compliance Assessment Tool ("EcoCAT"), and an Official Species List was obtained via the U.S. Fish and Wildlife Service ("USFWS") Information for Planning and Consultation ("IPaC") tool. In response to the IPaC findings, Tri-County Solar conducted an Updated Protected Species Screening Report in September of 2025, included in the submission package. Tri-County Solar values and takes seriously input from IDNR and USFWS. Which is why we have diligently pursued consultation and planning for responsible environmental management.

A. EcoCAT

The EcoCAT found the project site is neighboring critical lands and provided recommendations to prevent and mitigate impacts to these sites. These recommendations will be taken into consideration during site plan design, construction, and operation & maintenance. Additionally, the Project has adopted a Pollinator Friendly Habitat Plan in response to the EcoCAT findings.

Eight out of the nine identified species were determined to be unlikely to be adversely impacted by the Project. However, the Project created a mitigation plan for the Blanding Turtle. LaBella Associates, on behalf of Tri-County, developed a Construction Education and Encounter Plan (CEEP) specific to Blanding's Turtle.

The CEEP includes extensive staff training prior to construction. The training will include but not limited to; life-stage identification photos of Blanding's Turtles (and similar species), behavioral assessment, habitat education, and clear protocols prohibiting contact. Specialized Construction Monitors will also be involved. These monitors will receive specialty training and must be heavily involved in making decisions and operational processes.

During construction, the Project will be including installation of temporary fencing, daily visual inspections for turtles, and restrictions such as stop-work orders if a turtle is observed, at which point the IDNR will be notified. Any excavations (trenches, holes) will be filled or secured appropriately to avoid turtle entrapment.

By incorporating all IDNR's recommended measures for Blanding's Turtle, Tri-County Solar has mitigated the risk of adversely impacting the Blanding Turtle. The mitigation plan is in compliance with the recommendations set forth by IDNR.

B. IPaC

In its September 2025 IPaC review, the U.S. Fish & Wildlife Service identified six species with potential occurrence in or around the Tri-County Solar project area, but no critical habitats. Three of those species were assessed as unlikely to be present due to the absence of suitable habitat; two were candidate species, and the remaining species was the Rusty Patched Bumble Bee.

The IPaC determination for the Rusty Patched Bumble Bee (RPBB) was “may affect”, thus Tri-County Solar explicitly incorporated mitigation measures into its project planning. Most notably, the previously described native pollinator friendly habitat plan was recommended in LaBella’s Updated Protected Species Screening Report (UPSSR) response to IPaC as a key mitigation tool. UPSSR recommended enrolling the project into the Illinois “Pollinator Friendly Solar Site” program and our submission is attached to this application. This plan restores and enhances forage habitat (nectar and pollen resources) that supports RPBB and other pollinators, directly addressing the species’ foraging and nesting requirements as recommended by the USFWS. The pollinator friendly habitat plan will also positively impact the two listed candidate species.

Natural Resources & Land Evaluation: As part of Tri-Counties natural resources and land evaluation, a Natural Resource Inventory (NRI) was conducted in September 2025. Several topics came up in the NRI, leading to a recommendation to pursue a Storm Water Pollution Prevention Plan (SWPPP). Per Kane-DuPage Soil & Water Conservation Districts’ recommendation, Tri-County pursued a SWPPP with Weston & Sampson Engineers (W&S), a consultation group that specializes in creating SWPPPs for contaminated sites.

Through the SWPPP, Weston & Sampson addressed all applicable issues brought up in the NRI. This includes but is not limited to; issues associated with wetlands identified on site, aquifer contamination, site topography, soil and land erosion concerns, limitations of land use, permit requirements, and seasonally high-water tables. The SWPPP as designed will not only mitigate and prevent negative site impacts, but it will also leave the project site better than when we started through proactive environmental planning practices.

Two concerns that were brought up in the NRI are not applicable to the SWPPP and will be addressed here. The NRI noted that the project site is located on a Superfund Landfill site. This site has been remediated and determined ready for solar use by the USEPA and IEPA. Additionally, it was noted that the site is identified in Kane County Green Infrastructure Plan as Parks, Preserves & Conservation Areas, Environmental Resource Areas, and Wetlands. Tri-County recognizes how important natural lands are in County planning. However, Tri-County Solar LLC would like to emphasize that due to the Superfund Classification, the site is federally prohibited to be used for agriculture, recreation, commercial, business, and residential use. The USEPA has granted limited use strictly to industrial, to which the solar facility is approved under. While there are limitations on what the existing site can be used for as a capped landfill, the project has pursued consultation for a Pollinator Friendly Habitat Plan that will improve the habitat for both candidate and endangered species in the project vicinity.

Aviation Compatibility & Visual Impacts: Tri-County Solar evaluated the project for potential aviation safety and visual impacts. Using the FAA Notice Criteria Tool. The project was screened, and the results

showed that it does *not* exceed FAA notice criteria — indicating no need for formal airspace-obstruction evaluation. In parallel, Tri-County commissioned a detailed glare-study, using specialized simulation software to model light reflection from the solar arrays across the entire year. That study concluded that predicted glare remains below risk thresholds for visual impacts as defined by FAA guidance. Together, the NCT results and the glare-study support a “no adverse impact” determination, meaning that, the project is not expected to produce aviation safety hazards or problematic visual glare.

Noise Assessment: Tri-County Solar LLC conducted a detailed Noise Assessment Report to predict sound levels from the facility to nearby properties, particularly residential neighborhoods. The Project utilized a regular grid model called “receptors”. There were two locations identified: one at the closest residence and the second being near the state-park trail. The assessment modeled sound levels under operating conditions.

Receptors near the residential neighborhood predicted sound levels that were within the limits set by the Illinois Pollution Control Board (IPCB). However, the trail-loop receptor is close to the limit in the 1,000 Hz octave band (just 4 dB under the IPCB ceiling). Under the IPCB legislation, a state park is measured as the same levels for a residential neighborhood, Class A, though the Applicant would argue the limit for this area.

Tri-County Solar LLC would like to highlight that this area is already highly traffic due to being located on State highway 25 and with existing land use classifications for business, commercial, and industrial. Additionally, the Applicant identified that the proposed location has been determined to be in compliance with the 2013 Comprehensive Plan from the Village of South Elgin. This area has been identified for uses such as railroad, trucking, aviation, automobile parking, communication, and utilities facilities being dominant. All these uses would all be past the limit set by the IPCB. As such, the installation of a solar facility would be minimal to none in comparison to the other uses. Nevertheless, Tri-County Solar developed a mitigation plan in case the land is formally classified as Class A. The plan includes installation of an acoustic barrier capable of reducing sound levels by at least 10 dB below IPCB thresholds.

Overall, the noise study concludes that operational sound from the facility will remain below IPCB limits and therefore complies with both the IPCB regulations and Kane County’s noise requirements under its commercial solar-facility ordinance.

3.2.4 Vegetative Screening

In accordance with the Solar Ordinance, the Project design includes vegetative screening for non-participating landowners in the vicinity of the Project. The vegetative screening will include a continuous vegetated buffer of either native evergreen species only or a mix of native evergreen and deciduous tree species that are appropriate for the region and meet the screening requirements as outlined in the Solar Ordinance. In addition to vegetative screening, the Project design includes the planting of native and naturalized vegetation within the solar array. This vegetation was selected to reduce erosion within the Project footprint as well as to provide suitable habitat for a variety of game birds, songbirds, and pollinator species.

4.0 COMMUNITY ENGAGEMENT

Tri-County Solar began engaging with the community and nearby Cities in September of 2025. The Project has scheduled a voluntary community engagement meeting with the nearby residents along with a mailer campaign with additional project information. The first open house will be held on December 9th at the Brewster Creek Lodge to inform the residents of the solar project and address any potential questions. We have reached out to all neighboring Villages; South Elgin, Bartlett, and St. Charles for project feedback and several different local non-profit organizations for Memorandum of Understandings (MOUs), offering donations to promote local economic growth.

The Village of Bartlett and St. Charles Township replied that the project is outside of their jurisdiction and that they have no further comments. The Village of South Elgin provided a positive review of the solar project, stating that it is within their comprehensive area for commercial use and have voiced their support of the development of Tri-County Solar. Tri-County Solar LLC is continuing to collaborate with South Elgin as they want to be an active participant of the project. South Elgin's letter of positive recommendation will be shared at the time of a public hearing and upon request from the County Liaison.

Tri-County Solar prioritizes active community engagement and building long-term partnerships that elevate the community. We plan to continue engagement, to collect feedback from residents and neighboring villages on potential project adjustments, as well as continuing to find ways to give back to the community through local partnerships. The Tri-County Project is committed to continuing engagement to follow Kane Counties APPENDIX C: PUBLIC NOTICE REQUIREMENTS.

5.0 SUMMARY AND APPLICATION FEE

Tri-County Solar LLC would like to thank you for reading this Project Narrative in its entirety and reviewing the attached Appendices. The Applicant is thrilled to be collaborating with the County and is eager to answer all comments or questions relating to the Tri-County Solar Project. To finalize this application, the Applicant would like to state that ***the Project will comply with all regulations and conditions specified by the applicable ordinances of Kane County. Tri-County Solar LLC will work with the County to accommodate reasonable stipulations and conditions to the extent made a part of the authorization granted by the Kane County Board.***