

PROJECT SETTING

PROJECT LOCATION

Marshall Springs Solar and Marshall Springs BESS (“Project”) is proposed on a 1151 +/- acre site in Gillespie County, TX (Assessor’s Parcel Numbers [APN] 103744 & 8520939) further described in Table 1, *Parcel Summary* and shown in the attached site plan. Primary access to the site will be provided via Texas State Highway 16, which runs adjacent to the property. Existing land cover within the Project area consists of a mix of deciduous forest, evergreen forest, shrub/scrub, and grassland, and is generally consistent with the surrounding landscape.

Table 1, *Parcel Summary*

Assessor’s Parcel Number	Property Owner	Acreage
103744	Fluitt	627
8520939	Fluitt	523

GILLESPIE COUNTY DEVELOPMENT CONTEXT

The Marshall Springs Solar and BESS Project is located on private lands in unincorporated Gillespie County, Texas. The County does not have a comprehensive land use plan, zoning ordinance, or specific solar development regulations. Accordingly, the project is not subject to any discretionary land use or zoning approvals. However, various ministerial permits may apply depending on the nature of development activity as further described in Table 2, *Gillespie County Permit Applicability* below.

Table 2, *Gillespie County Permit Applicability*

Permit/ Approval	Trigger	Applicability
Floodplain Development Permit	Development within a FEMA-designated Special Flood Hazard Area (SFHA)	Not applicable. Project site is entirely within FEMA Zone X, outside any mapped SFHA.
Right-of-Way (ROW) Permit	Improvements proposed within County-maintained road right-of-way	Not anticipated. Site access is via State Highway 16 (TxDOT jurisdiction). No county ROW will be impacted.
Subdivision Plat Application	Subdivision or platting of existing parcels	Not applicable. Project will utilize two existing parcels; no subdivision is proposed.
On-Site Sewage Facility (OSSF) Permit	Installation of septic or wastewater systems	Not applicable. Project will not include permanent restroom or wastewater infrastructure.

In summary, Gillespie County’s limited permitting framework results in no anticipated discretionary approvals for the Marshall Springs Solar and BESS Project. The Project is proceeding in compliance with applicable state and local requirements.

PROJECT DESCRIPTION

PROJECT OVERVIEW

The Marshall Springs Solar and Marshall Springs BESS Projects are co-located renewable energy facilities located in Gillespie County, Texas. While the two projects are being developed under separate legal entities, Marshall Springs Solar, LLC and Marshall Springs Storage, LLC, they are situated on adjacently and will share certain non-electric infrastructure.

Marshall Springs Solar is a proposed 180 MWdc / 150 MWac single-axis tracking photovoltaic facility occupying approximately 800 acres. Marshall Springs BESS is a 150 MW / 300 MWh battery energy storage system sited on approximately 17 acres. Both projects will line tap to a LCRA 138kV transmission line located at the northwestern boundary of the site through separate collector substations.

Each project will be separately metered and operated as standalone facilities but may share internal access roads, security fencing, grading, and drainage infrastructure, where appropriate.

PROJECT FEATURES

Gillespie County does not currently have solar-specific development standards. However, the project has been designed in close coordination with local officials, including the County Fire Marshal, to meet best practices for fire and emergency access, electrical safety, and environmental compatibility.

A summary of the design parameters for both projects is provided in Table 3, below.

Table 2, Edgewcombe County Solar Development Standards

Development Standard	Required
Interconnection	Line Tap via LCRA 138kV line
Setbacks	55ft from property boundaries
Internal Roads	5.0-meter-wide all weather roads (per Fire Marshal Reqs)
Access	Via Texas State Highway 16
Fencing	Perimeter fencing around both PV and BESS areas
Fire Safety	Dedicated firewalls and fighting systems at BESS facility

Coordination with the Gillespie County Fire Marshal confirmed compliance with National Fire Protection Association (NFPA) access standards, including 20-foot-wide access roads and turn radius standards of 28 ft (inside) and 45 ft (outside), which have been incorporated into the site plan.

Land cover within the project footprint consists primarily of shrubland, grassland, and mixed forest. A limited hydrology study has been conducted, and the site lies entirely within FEMA Zone X, indicating minimal flood risk. No jurisdictional waters are anticipated to be impacted, and wetlands delineations are underway with the U.S. Army Corps of Engineers (USACE) via an Approved Jurisdictional Determination (AJD) process.