New Market Solar II Stringtown Road Buford, Highland County, Ohio August 27, 2020 Terracon Project No. N1207316



Prepared for:

Hecate Energy Highland 2, LLC Chicago, Illinois

Prepared by:

Terracon Consultants, Inc. Cincinnati, Ohio

Tierracon

terracon.com

Ohio Power Siting Board Application New Market Solar Farm Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC Exhibit G: Ecological Report New Market II

Environmental

Facilities

Geotechnical

Materials



August 27, 2020

Hecate Energy Highland 2, LLC 621 Randolph Street Chicago, Illinois 60661

Attn: Ms. Patti Shorr

P: 614-205-3798

E: PShorr@HecateEnergy.com

Re: Ecological Resources Analysis Report

New Market Solar II Stringtown Road

Buford, Highland County, Ohio Terracon Project No. N1207316

Dear Ms. Shorr:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Ecological Resource Analysis Report (ECAR) for the above-referenced site. Terracon's services were performed in a manner consistent with generally accepted practices of profession undertaken in similar studies in the same geographical area during the same time period. We appreciate the opportunity to provide services to Hecate Energy Highland 2, LLC. If you have any questions concerning this report, or if we can assist you in any other matter, please call our office at 513-612-9094.

Sincerely,

TERRACON CONSULANTS, INC.

Cassandra Brendel

Staff Scientist

Scott West

Group Manager

So flat



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1.0 EXECUTIVE SUMMARY

Terracon Consultants, Inc. (Terracon), on behalf of Hecate Energy Highland 2, LLC, has completed an Ecological Resource Analysis (ERA) of the proposed New Market Solar II Project. The ERA was conducted per the *Ohio Power Siting Board (OPSB) in order to fulfill the requirements of Ohio Administrative Code (OAC)* § 4906-4-08(B). The purpose of ERA was to evaluate Project impacts on ecological resources through environmental studies and state and federal natural resources agency coordination. This evaluation includes a project site map review, a plant and animal literature review, a plant and animal field survey, a Waters of the United States (WOUS) field survey, a review of potential impacts to the aforementioned resources, and short-term and long-term mitigation measures.

Project Information

Hecate Energy Highland 2, LLC, is proposing to construct the New Market Solar II solar farm (Project Site) near Buford, Ohio, which is located approximately 25 miles east of Cincinnati, Ohio. The proposed photovoltaic (PV) solar energy facility will have a generation capacity of 35 megawatts (MW). The Project is proposed to be constructed within approximately 721-acres of private leased land located in Highland County, Ohio.

Ecological Resource Project Site Map Review

Terracon performed an ecological resource project site map review of the approximately 721-acre Project Site and within a 0.25-mile buffer around the Project Site. The Project Site map review included an assessment of topography, aerial imagery, wetlands and water features, soils, land use, wildlife resources and areas, nature preserves, and conservation areas within a quarter-mile of the site boundary. Based on the ecological resource Project Site map review, the Project Site is proposed to be built on predominantly, seasonally disturbed cultivated cropland. The Project Site will be converted from agricultural land to a commercial solar farm and will no longer be utilized for agriculture.

Literature Review – Plant and Animal

Terracon performed a plant and animal literature review of threatened and endangered (T&E) species habitat assessment review and species that are of commercial or recreational value at the Project Site. A review of federal and state-listed species that could potentially occur in the area of the Project Site identified two federally endangered and one federally threatened species, as well as six state endangered and three state threatened species.

Field Survey Results - Plant and Animal

The Project Site was observed as predominantly open agricultural land with limited, interspersed wooded areas. Potential suitable habitat for the federally-listed Indiana bat (*Myotis sodalis*) and Northern long-eared bat (*Myotis septentronalis*) was observed within wooded areas on the Project Site.

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Field Survey Results - Vegetation and Surface Water

Terracon conducted wetland delineations to identify potential Waters of the United States (WOUS) and wetlands at the Project Site and within a 100-foot buffer around the Project Site. Based on the wetland delineations, ten wetlands totaling 45.78 acres, eight streams totaling 8,747 linear feet, and five ponds totaling 2.86 acres were observed on the Project Site and within the 100-foot buffer. Terracon anticipates that all identified stream channels will be jurisdictional, in accordance with Section 404 of the Clean Water Act (CWA). However, newly issued regulatory guidance may determine the on-site ephemeral streams to be non-jurisdictional to the USACE. The Ohio EPA will likely take jurisdiction on these features should the USACE not. The Project Site is located within the jurisdiction of the United States Army Corps of Engineers (USACE) Huntington District, Cincinnati Field Office, in Cincinnati, Ohio. The USACE holds jurisdiction over WOUS determined to be non-isolated within the Project Site boundaries. The Ohio Environmental Protection Agency (OEPA), in accordance with Section 401 of the CWA and the Ohio Revised Code 6111.02 to 6111.028 for issuance of a Water Quality Certificate (WQC), takes jurisdiction of isolated wetlands that may exist or are impacted within the Project Site boundaries.

Ecological Impacts

Based on our review, it is Terracon's opinion that the conversion of agricultural land to a solar farm should have no significant or adverse impact on wildlife within the vicinity of the Project Site. Suitable habitat for the Indiana bat and Northern long-eared bat (as well as three state listed species) was observed at the Project Site; therefore, any tree clearing should be performed seasonally (from October 1 to March 31) or a presence/absence survey by a qualified biologist and additional consultation with regulatory agencies may be necessary. In addition, incidental take of Northern long-eared bats is exempt in this location under the 4(d) rule. It is Terracon's opinion there is no suitable habitat for the other federal and state-listed species at the Project Site. Based on Terracon's review of the Project Site and planned development activities, no adverse effects to threatened or endangered species are anticipated. Terracon has begun early consultation with Ohio Department of Natural Resources (ODNR) and United States Fish and Wildlife Service (USFWS). Consultation correspondence records are appended to this report. A Preliminary Jurisdictional Determination Request has been submitted to the USACE for final concurrence with Terracon's Wetland Delineation Report for the Project Site (included as Appendix C). Solar arrays are not expected to impact regulated features on the Project Site. If impacts to these WOUS cannot be fully avoided, permitting would be required by these agencies.

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2.0 PROJECT DESCRIPTION

2.1 Project Site

The Project Site comprises approximately 721-acres of land. The majority of the Project Site is comprised of agricultural land, the proposed photovoltaic (PV) panel area, and a substation and associated structures and equipment. These portions of the Project Site consist of agricultural land with few, small intermittent patches of forested areas. A transmission line also traverses agricultural land and briefly parallels Stringtown Road to connect the PV panel area to the substation. Numerous overhead power lines appear to cross the Project Site and are assumed to provide a point of interconnection for the Project.



Figure 1. An aerial overview of the Project Site.

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2.2 Project

The Project consists of a PV solar energy facility with a proposed generation capacity of 35 megawatts (MW). The Project includes the development of PV panels and supporting steel frames. Foundations for the solar array may consist of wide flange steel piles (W6x9 or similar) or other propriety sections. In addition, Terracon understands that invertors, transformers, and other appurtenant equipment may be supported on shallow spread or mat foundations or through a direct drilled pier foundation. We anticipate that the solar field will follow existing topographic grade with minimal grading required. Terracon understands plans also include the development of some access roads, transmission lines, and a small substation (Figure 1).

3.0 REGULATORY REVIEW

As stated in the Executive Summary, this Ecological Resource Analysis (ERA) was conducted per the Ohio Power Siting Board (OPSB) in order to fulfill the requirements of Ohio Administrative Code (OAC) § 4906-4-08(B). The purpose of conducting this ERA was to evaluate Project impacts on ecological resources through environmental studies and state and federal natural resources agency coordination. Per OPSB regulations, the evaluation includes a literature survey of plant and animal life within a 0.25-mile buffer beyond the Project Site boundary, field survey of suitable habitat and occurrence for plant and animal species identified in the literature review (1-A), a field survey of the vegetation and surface waters within 100-feet of the potential construction (1-B), and a summary of any additional studies which have been made by or for the applicant addressing the ecological impact of the proposed facility (1-E). Utilizing the results of the field survey, this evaluation details ecological resources that may be impacted during construction including, but not limited to linear feet and acreage impacted, proposed crossing methodology of each stream or wetland, the extent of vegetation clearing, potential reduction of woody vegetation clearing, potential impacts to wildlife and their habitat (2-A). Short-term and long-term mitigation measures are included and describe post-construction site restoration / stabilization of disturbed soils, a frac contingency plan for horizontal drilling under stream and wetlands, best management practices (BMPs) including sedimentation and erosion control for construction around streams and wetlands, and vegetative protection (2-B-i-vii).

Terracon will continue coordination with the Ohio Department of Natural Resources (ODNR) and United States Fish and Wildlife Service (USFWS) regarding occurrence records and recommendations regarding federal and state protected species. Post-construction agency coordination will occur including the submittal of an avian and bat monitoring plan.

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4.0 LITERATURE REVIEW

4.1 Ecological Resource Project Site Map Review

4.1.1 Topographic Map

The United States Geologic Survey (USGS) 7.5-Minute Topographic Map of the Project Site was reviewed to identify drainages and/or other potential water features within the Project Site. Based on an evaluation of the USGS map, The Project Site appears to be relatively flat, averaging approximately 1,000 feet above sea level (asl), with steeper sloping in the northeastern corner of the Project Site. The USGS map indicates the presence of multiple intermittent streams across the Project Site. One intermittent stream is depicted as running northwest to southeast in the northeastern corner of the Project Site. Additionally, another intermittent stream crosses the proposed transmission line just west of Stringtown Road, and a third intermittent stream follows the proposed transmission line westward from approximately 3,000 feet east of Gath Road to where the proposed transmission line turns northwestward and crosses Gath Road. A fourth intermittent stream is depicted as running northeast to southwest in the north central portion of the Project Site. Five ponds are depicted on the Topographic Map; two ponds in the eastern portion of the Project Site, two ponds in the central portion of the project Site, and one point in the southwestern portion of the Project Site. The USGS topographic map is included as Exhibit 2 in Appendix A.

4.1.2 Aerial Imagery

Terracon reviewed a 2019 aerial photograph of the Project Site. The Project Site predominately consists of agricultural land with interspersed forested areas and a few paved county roads and dirt/gravel farm roads. The 2019 aerial image is included as Exhibit 3 in Appendix A.

4.1.3 Wetlands and Waters of the United States

National Wetlands Inventory (NWI) data for the Project Site was reviewed to identify potential wetland areas. The map for the project site was published by the U.S. Department of the Interior's Fish and Wildlife Service and depicts probable wetland areas based on stereoscopic analysis of high-altitude aerial photographs and analysis of infrared bands from remotely-sensed imagery. The NWI map depicts six intermittent streams (R4SBC), four ponds, and one scrub/shrub wetland across the project site. The NWI map is included as Exhibit 4 in Appendix A.

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4.1.4 Soils

Data from the soil survey of Highland County, Ohio was reviewed to identify soil types, including hydric soils. Data for the soil survey was compiled by the U.S. Department of Agriculture Natural Resource Conservation Service (NRCS) in 1977. Hydric soils information was gathered from the 'National Hydric Soils List' (USDA Natural Resource Conservation Service, https://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/use/hydric/). A soil survey map is included as Exhibit 5A in Appendix A.

- Algiers silt loam (Ag): This soil is defined as somewhat poorly drained, nearly level, and typically located in flood plains. The soil color is typically dark grayish brown. This map unit is classified as hydric.
- Clermont silt loam, 0 to 1 percent slopes (Cle1A): This soil is defined as somewhat poorly to poorly drained and nearly level. The soil color is typically grayish brown. This map unit is classified as hydric.
- Eel silt loam, 0 to 2 percent slopes, occasionally flooded (Ee): This soil is defined as well drained to very poorly drained and is typically found in flood plains. The soil color ranges from yellowish brown to dark grayish brown. This map unit is classified as hydric.
- Hickory clay loam, 12 to 18 percent slopes, severely eroded (HyD3): This soil is defined as moderately well to well drained and is typically found in narrow bands along streams and at the end of waterways and stream outlets. The soil color ranges from dark grayish-brown with yellowish-brown mottles to dark yellowish brown. This map unit is not classified as hydric.
- Hickory clay loam, 6 to 12 percent slopes, severely eroded (HyC3): This soil is defined as moderately well to well drained and is typically found in narrow bands along streams and at the head of waterways. The soil color ranges from dark grayish-brown with yellowish-brown mottles to dark yellowish brown. This map unit is not classified as hydric.
- Hickory silt loam, 6 to 12 percent slopes, moderately eroded (HkC2): This soil is defined as moderately well to well drained and is typically found in narrow bands along streams and slope breaks. The soil color ranges from dark grayish-brown with yellowish-brown mottles to dark yellowish brown. This map unit is not classified as hydric.
- <u>Jonesboro-Rossmoyne silt loams, 2 to 6 percent slopes (JoR1B1)</u>: This soil is defined as moderately well drained, gently sloping to sloping, and is typically found along drainageways. The soil color ranges from dark grayish brown to yellowish-brown. This map unit is not classified as hydric.
- Jonesboro-Rossmoyne silt loams, 2 to 6 percent slopes, eroded (JoR1B2): This soil is defined as moderately well drained, gently sloping to sloping, and is typically found along drainageways. The soil color ranges from dark grayish brown to yellowish-brown. This map unit is not classified as hydric.
- Rossmoyne silt loam, 6 to 12 percent slopes, moderately eroded (RpC2): This soil is defined as moderately well drained, sloping, and is typically found along drainageways.

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The soil color ranges from dark grayish brown to yellowish-brown. This map unit is not classified as hydric.

- Westboro-Schaffer silt loams, 0 to 2 percent slopes (WsS1A1): This soil is defined as somewhat poorly drained, nearly level, and typically found in till plains. The soil color ranges from dark grayish brown to yellowish brown. This map unit is classified as hydric.
- Westboro-Schaffer silt loams, 2 to 4 percent slopes (WsS1B1): This soil is defined as somewhat poorly drained, gently sloping, and is typically found in till plains. The soil color ranges from dark grayish brown to yellowish brown. This map unit is classified as hydric.

Slopes greater than 12% are apparently not present within Project Site boundaries, according to the reviewed USDA SSURGO soils data; therefore, risk of soil erosion is considered to be negligible. A map has been included as Exhibit 5B in Appendix A.

4.1.5 Land Use

The Project Site consists of multiple land use types based on data provided by the Multi-Resolution Land Characteristics Consortium (MRLC), from the 2016 National Land Cover Database (Yang et al. 2018) and included as Exhibit 6 in Appendix A. The following land use categories were identified within the Project Site boundaries:

- Agricultural (Cultivated Crops)- areas used for the production of annual crops, such as corn, soybeans, vegetables, tobacco, and cotton, and also perennial woody crops such as orchards and vineyards. Crop vegetation accounts for greater than 20% of total vegetation. This class also includes all land being actively tilled.
- Forest (Deciduous)- areas dominated by trees generally greater than 5 meters tall, and greater than 20% of total vegetation cover. More than 75% of the tree species shed foliage simultaneously in response to seasonal change.
- Forest (Mixed Forest)- areas dominated by trees generally greater than 5 meters tall, and greater than 20% of total vegetation cover. Neither deciduous nor evergreen species are greater than 75% of total tree cover.
- Open Water- areas of open water, generally with less than 25% cover of vegetation/land cover.
- Pasture/Hay- areas having vegetation cover comprised primarily of introduced or enhanced native forage species that is used for livestock grazing.
- Wetlands (Woody Wetlands)- areas where forest or shrubland vegetation accounts for greater than 20% of vegetative cover and the soil or substrate is periodically saturated with or covered with water.
- Developed, Open Space- areas with a mixture of some constructed materials, but mostly vegetation in the form of lawn grasses. Impervious surfaces account for less than 20% of total cover. These areas most commonly include large-lot

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- single-family housing units, parks, golf courses, and vegetation planted in developed settings for recreation, erosion control, or aesthetic purposes.
- Developed, Low Intensity- areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 20% to 49% percent of total cover.
 These areas most commonly include single-family housing units.
- Developed, Medium Intensity- areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 50% to 79% of the total cover. These areas most commonly include single-family housing units.

The Project Site is located near Buford in rural, unincorporated Highland County, Ohio. Review of the 2016 NLCD determined that the most prominent land use on Project Site was cultivated crops, accounting for approximately 87% of the total Project Site acreage. The conversion of these agricultural fields to a solar farm should have negligible environmental impact as agricultural fields provide minimal habitat for plant and animal species and are seasonally disturbed via farming activities. Solar development will provide similar minimal habitat with no seasonal disturbances except for regular maintenance of ground cover. Adequate vegetative ground cover will be maintained as part of post construction and operation activities. Where possible, the client will utilize native plant species for post-construction ground cover.

4.2 Literature Review – Plant and Animal

4.2.1 Wildlife Resource Conservation Areas

A review of the Ohio Division of Wildlife Area maps was conducted to determine the potential for wildlife areas, nature preserves, and other conservation areas being located within the Project Site boundaries or within a 0.25-mile buffer surrounding the Project Site. The nearest wildlife conservation area is the Indian Creek Wildlife Area located in Fayetteville, Ohio, approximately eight miles northwest of the Project Site. There are no wildlife areas or nature preserves within the Project Site boundaries or within the 0.25-mile buffer, as shown in Exhibit 9 of Appendix A.

4.2.2 Migratory Birds and Bald Eagles

Migratory birds are protected by the Migratory Bird Treaty Act (MBTA) of 1918, and bald eagles are protected by the Bald and Golden Eagle Protection Act (BGEPA). These Acts prohibit the "take", possession, import, export, transport, sale, purchase, barter, or offer for sale, purchase, or barter of any migratory bird, or the parts, nest, or eggs of such bird. The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, molest, or disturb". "Disturb" means, "to agitate or bother such bird to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering

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behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior". Bald eagles, like most native birds, are also protected by the MBTA.

Construction activities on the Project Site have the potential to displace these species from habitat that is regularly utilized for foraging, breeding, and nesting. Terracon reviewed multiple bird species conservation platforms to determine the likelihood of utilization of the Project Site by these species. Terracon accessed the USFWS Information, Planning, and Conservation System (IPAC), which provides an online list of threatened and endangered (T&E) species as well as migratory birds, including eagles. No migratory birds, including eagles, or critical habitat for migratory birds were identified on the IPAC list as occurring within the Project Site or 0.25-mile buffer. The Audubon Society is a conservation group that designates Important Bird Areas (IBA) that provide essential habitat for bird species. It is Terracon's opinion that the Project Site and surrounding 0.25-mile buffer do not provide adequate habitat for these avian species. Terracon also reviewed eBird (Cornell Lab of Ornithology, 2002), which provides an online checklist program that compiles bird abundance and distribution data made by recreational and professional bird watchers. The nearest eBird 'personal location' was located approximately 6 miles north of the Project Site boundary. There are no records for known bald eagle nests within the Project Site boundaries or 0.25-mile buffer area.

The proposed Project solar array will employ PV solar panels. PV solar panels, in comparison with coal, oil, natural gas, and wind energy, provide electricity without emitting any carbon pollution. The PV panels proposed for this project are relatively short (8-foot tall panels), which reduces the risks of collisions from birds. The Project Site predominantly consists of cultivated cropland, which is seasonally disturbed for agriculture, and dispersed wooded land. There are no anticipated impacts to the wooded areas on the Project Site and no significant changes to the agricultural fields with the exception of revegetation, where necessary, with native grasses. Additionally, this land currently does not provide adequate habitat for most migratory birds, and most migratory birds would utilize higher quality habitat in surrounding areas. It is Terracon's opinion that the Project will have a minimal effect on migratory birds or bald eagles within the Project Site boundaries and 0.25-mile buffer.

4.2.3 Threatened and Endangered Species

Terracon has performed a desktop T&E species review and a site reconnaissance to determine the potential for federally protected species being located within the Project Site boundaries and 0.25-mile buffer surrounding the Project Site boundaries. Applicable federal species source lists for Highland County were reviewed to determine which listed species may be located in the Project Site area. Terracon searched available online data to evaluate the known past presence and potential presence of T&E species and critical habitat in the Project Site area. The USFWS IPAC list was reviewed to identify potential federally listed species that may occur near of the Project Site. Terracon submitted early coordination letters to the

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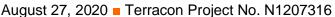


USFWS and ODNR for occurrences of listed species within the Project Site boundaries and 0.25-mile buffer. The following species were identified through these reviews.

Table 1. Federal and State-listed threatened and endangered species

Taxon	Taxon Name Species Ha		Status	Potential Habitat/Presence on the Project Site
Mammal	Indiana Bat (<i>Myotis</i> sodalis)	During winter, this species hibernates in caves or, occasionally, in abandoned mines. During summer, this species is found in wooded areas.	State and Federally Endangered	Potential suitable habitat on Project Site within wooded areas and presence established in the area.
Mammal	Northern Long-eared Bat (<i>Myotis</i> septentrionalis)	During winter, this species hibernates in caves or, occasionally, in abandoned mines. During summer, this species is found in wooded areas.	Stated and Federally Threatened	Potential suitable habitat on Project Site within forested areas.
Avian Loggerhead shrike (Lanius ludovicianus)		This species can be found in open areas with scattered shrubs and trees or found in heavily wooded habitats with large openings.	State Endangered	Lack of scrub shrub cover on the Project Site; therefore, no suitable habitat.
Avian	King Rail (<i>Rallus</i> <i>elegans</i>)	This species can be found in densely covered, shallow fresh or brackish marshes; however, this species is typically found closer to the eastern and Atlantic coastal regions.	State Endangered	Potential suitable habitat on Project Site within emergent wetlands; however, this species typically resides near the eastern and Atlantic coastal regions.
Avian	Barn Owl (<i>Tyto alba</i>)	This species can be found in a wide range of habitats including woodlands, barns, and cliffs with nearby farmland, marshes, and/or prairies.	State Endangered	Potential suitable habitat on Project Site within woodlands and emergent wetlands.
Fish	Bigeye shiner (Notropis boops)	This species can be found in flowing, clear creeks to small and medium-sized rivers. There are typically found in the emergent vegetation in gravel, rock, or sand substrate.	State Threatened	Suitable habitat on Project Site within stream channels. No anticipated impacts to streams; therefore, not likely to impact species habitat.

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Isopod	Frost Cave Isopod (Caecidotea rotunda)	This species is known to occur in very limited caves.	State Threatened	Lack of caves on Project Site; therefore, no suitable habitat.
Insect	Ohio Cave Beetle (Pseudanophthalmus ohioensis)	This species is known to occur in very limited caves.	State Endangered	Lack of caves on Project Site; therefore, no suitable habitat.
Insect	Blue Corporal (<i>Ladona deplanata</i>)	This species is known to occur around ponds, lakes, and open areas of slow streams.	State Endangered	Suitable habitat on Project Site within and around ponds, and open areas of slow streams. No anticipated impacts to ponds or streams; therefore, not likely to impact species habitat.
Flowering Plant	Running Buffalo Clover (<i>Trifolium</i> stoloniferum)	This species typically occurs in mesic habitats of partial to filtered sunlight, where there is a prolonged pattern of moderate periodic disturbance, such as mowing, trampling, or grazing. It is most often found in regions underlain with limestone or other calcareous bedrock.	Federally Endangered	Suitable habitat not likely to be present on the Project Site.

Based on the desktop evaluation to determine potential habitat, there is potentially suitable habitat for the Indiana bat, the Northern long-eared bat and the barn owl in the form of forested land, which may provide suitable summer roosting habitat on the Project Site. A field habitat assessment was performed for species that are likely to be present on site. This field habitat assessment is further detailed in Section 5.2. The USFWS IPAC report is provided in Appendix B.

4.2.4 Commercial and Recreational Plant and Animal Species

Due to the nature of the current Project Site use for row crop agriculture, commercial and recreational plant and animal species are not anticipated to be present on the Project Site.

5.0 FIELD SURVEY RESULTS

Field surveys were performed at the site, as applicable, based on the results of the desktop studies detailed above.

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5.1 Field Results – Vegetative Communities

Various plant communities and types of land cover were observed at the site including forested wetlands, emergent wetlands, and various upland communities. The Project Site consists of approximately 87% agricultural row cropland dominated by the remnants of soybeans (*Glycine max*). The remaining portions of the Project Site predominantly consists of forested areas, which were dominated by white oak (*Quercus alba*), shagbark hickory (*Carya ovata*), American beech (*Fagus. grandifolia*), red maple (*Acer rubrum*), and sweetgum (*Liquidambar styraciflua*).

5.2 Field Results – Plant and Animal Threatened and Endangered Species

As stated above in Section 4.2.3, an ecological resource project site map review of threatened and endangered species and early coordination with ODNR and USFWS identified two federally endangered and one federally threatened species, as well as six state endangered and three state threatened species within the Project Site boundaries and 0.25-mile buffer. Potential habitat for the Indiana bat, the Northern long-eared bat and the barn owl was identified on the Project Site. Additionally, potential habitat for the blue corporal and the bigeye shiner was identified on the Project Site.

Terracon performed a species habitat survey, within the Project Site boundaries, in an effort to identify potential suitable habitat for the abovementioned species that were deemed likely to be present on site. Critical habitat for these species was not identified within the Project Site boundaries.

Table 2. Results of federal/State-listed threatened and endangered species survey

Name	Species Habitat	Results of Threatened and Endangered Species Field Survey	Effect Finding / Implication for Project
Indiana Bat (Myotis sodalis) and Northern Long-eared Bat (Myotis septentrionalis)	During winter, these species hibernates in caves or, occasionally, in abandoned mines. During summer, these species is found in wooded areas.	Mature trees were observed in forested areas on the Project Site with relatively open understories and nearby stream corridors.	Potential habitat was identified on the Project Site. Any tree clearing should be performed seasonally (October 1st – March 31st) or presence/absence surveys would be necessary. Incidental take, which is the incidental to, and not the purpose of, the carrying out of an otherwise lawful activity, of Northern long-eared bats is exempt in this location under the 4(d) rule.
Barn Owl (<i>Tyto</i> alba)	This species can be found in a wide range of habitats including woodlands, barns, and cliffs with	Forested areas with nearby wetlands were observed on the Project Site.	Potential habitat was identified on the Project Site. Impacts to forested areas will be avoided; therefore,

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	nearby farmland, marshes, and/or prairies.		impacts to this species are not anticipated.
Bigeye shiner (<i>Notropis</i> boops)	This species can be found in flowing, clear creek to small and medium-sized rivers. There are typically found in the emergent vegetation in gravel, rock, or sand substrate.	Small intermittent streams were identified within Project Site boundaries.	Potential habitat was identified on the Project Site. Impacts to streams will be avoided; therefore, impacts to this species are not anticipated.
Blue Corporal (Ladona deplanata)	This species is known to occur around ponds, lakes, and open areas of slow streams.	Ponds and slow, ephemeral streams were observed on the Project Site.	Potential habitat was identified on the Project Site. Impacts to streams will be avoided; therefore, impacts to this species are not anticipated.

It is Terracon's understanding that the proposed Project has prioritized avoidance measures for sensitive habitats such as eliminating the need for clearing of forested areas, avoidance of wetland features, and no proposed in-stream work.

5.3 Field Results – Wetland Delineation

Terracon performed a wetland delineation, which can be found in Appendix C, to determine if wetlands or other waters under the jurisdiction of the USACE or the OEPA are present at the Project Site. The purpose of these investigations was to identify and evaluate the impacts of this project to potential jurisdictional waters. Terracon conducted a site reconnaissance of the Project Site, in December of 2017, January, June, and July of 2018, August 2019, and January 2020, to characterize the existing site conditions and observe for the presence of wetlands and potential jurisdictional waters. The evaluation methods generally followed the routine onsite determination method referenced in the 1987 USACE Manual and 2010 Midwest Regional Supplement. Additionally, following OPSB reporting requirements, water features were field identified within a 100-foot buffer around the Project Site. This requirement leads to slight differences between the delineated water features noted in this report and the attached wetland delineation report(Appendix C).

Wetlands generally have three essential characteristics: hydrophytic (wetland) vegetation, hydric soils, and wetland hydrology. Based on NWI data, aerial imagery and topographical data, on-site areas were investigated for potential wetland properties. Additional areas were investigated, based on observations made during the site reconnaissance. Data regarding the three essential characteristics was gathered within observed suspect wetland areas to further delineate boundaries.

Upon completion of the review of the three wetland criteria at each area, a wetland determination was made. Under normal circumstances, if one or more of the wetland criteria were not identified, the area was not considered to be a wetland. If all three wetland indicators

New Market Solar II Buford, Ohio

August 27, 2020 Terracon Project No. N1207316



were identified, the area was classified as wetland. Additional observations were made throughout the wetland area to define the wetland/non-wetland boundary. Vegetation, soil and hydrology assessment data from at least one location within the wetland and one upland location outside of the wetland were recorded on a USACE Wetland Determination Form which can be found in Appendix C.

Terracon also made observations of Project Site features that may be considered jurisdictional waterbodies. If a potential jurisdictional waterbody was identified, observations regarding its characteristics and location were recorded.

The majority of the Project Site consisted of agricultural land with limited, interspersed forested areas. Ground photographs, included in Appendix C, provide an indication of the physical characteristics observed during the site visit. Descriptions of the observed areas are listed in the following sections.

5.3.1 **Wetland Characteristics**

Various plant communities and types of land cover were observed at the Project Site including forested wetlands, emergent wetlands, and upland communities. Forested wetlands were dominated by red maple, sweetgum, and Virginia white grass. Emergent wetlands were dominated by touch-me-nots, yellow nutsedge and spicebush.

5.3.2 Delineated Features

The following wetlands were observed at the Project Site and within the 100-foot buffer during the site reconnaissance. A map of these features is provided as Exhibit 7 in Appendix A. The size of each wetland, classification as palustrine forested (PFO) or palustrine emergent (PEM), and potential jurisdictional status are listed.

Table 3. Wetland features observed on the Project Site and within 100-foot buffer, their expected jurisdictional status, and if impacts are anticipated.

Wetland	Size (acres)	Cowardin Classification	USACE Jurisdictional (Y/N)	Impacts
Α	0.55	PFO	Υ	N
В	8.97	PFO	Y	N
С	0.07	PFO	Y	N
D	17.97	PFO	Y	N
E	0.46	PFO	Y	N
F	0.36	PFO	Υ	N
G	9.25	PEM/PFO	Y	N
Н	6.84	PEM/PFO	Y	N
	0.65	PFO	Y	N

New Market Solar II Buford, Ohio

August 27, 2020 Terracon Project No. N1207316



J	0.66	PFO	Υ	N
TOTAL		45.78 acres		

PEM – Palustrine emergent wetland; PFO – Palustrine forested wetland

The above listed wetland features were observed to have a significant nexus connection to other potential WOTUS, thereby likely defining as jurisdictional features to the USACE.

5.3.3 **Streams**

The following streams were observed at the Project Site and within the 100-foot buffer during the site reconnaissance. The length of each stream, classification as intermittent or ephemeral, and potential jurisdictional status are listed.

Table 4. Stream features observed on the Project Site and within 100-foot buffer and if impacts are anticipated.

Streams	Length (linear feet)	Flow Regime	Average Stream Width at Top of Bank (feet)	Impacts
1 (Flat Run)	1,116	Intermittent	6-8	N
2	2,009	Ephemeral	4-6	N
3	912	Ephemeral	3-5	N
4 (Bell's Run)	2,600	Intermittent	6-8	N
5	904	Intermittent	3-5	N
6	169	Ephemeral	3-5	N
7	502	Ephemeral	3-5	N
8	535	Ephemeral	3-5	N
TOTAL	8,747 linear feet			

The above listed stream features were observed to have a significant nexus to another potential WOUS, White Oak Creek, which likely qualifies these waters as jurisdictional features to the USACE. However, newly issued regulatory guidance may determine the onsite ephemeral streams to be non-jurisdictional to the USACE.

Other Waters 5.3.4

The following ponds were observed at the Project Site and within the 100-foot buffer during the site reconnaissance. The size of each pond, Cowardin Classification (palustrine unconsolidated bottom (PUB) for all on-site features), and potential jurisdictional status are listed.

New Market Solar II Buford, Ohio

August 27, 2020 Terracon Project No. N1207316



Table 5. Pond features observed on the Project Site and within 100-foot buffer, their expected jurisdictional status, and if impacts are anticipated.

Pond	Size (acres)	Cowardin Classificati on	USACE Jurisdictional (Y/N)	Impacts
1	0.27	PUBH	N	N
2	0.69	PUBH	Υ	N
3	0.48	PUBH	N	N
4	0.89	PUBH	N	N
5	0.53	PUBH	N	N
TOTAL	2.86			

PUB – Freshwater pond; unconsolidated bottom; permanently flooded

The ponds within the Project Site boundaries were observed as having significant nexus to other WOUS and will thereby likely be jurisdictional features.

The on-site WOUS boundaries designated by Terracon are preliminary, and only the USACE and OEPA can make final Jurisdictional Determinations. A Preliminary Jurisdictional Determination Request has been submitted to the USACE for final concurrence.

6.0 SUMMARY OF FIELD SURVEYS

A summary of field observations and conclusions concerning jurisdictional status of observed water features and status of protected species is outlined in the following sections.

6.1 Threatened and Endangered Species

A species habitat survey was performed within the Project Site boundaries for species that were deemed to potentially have suitable habitat on the site or be located on the site. Due to the presence of suitable habitat for the Indiana bat and Northern long-eared bat, any tree clearing would likely need to be performed seasonally (from October 1 to March 31). In addition, incidental take of Northern long-eared bats is excepted in this location under the 4(d) rule. The additional species which had potential habitat present at the Project Site are not likely to be adversely affected due to avoidance of impacts to their habitats. No suitable habitat was observed for the Running buffalo clover which resulted in a no effect finding. The Threatened and Endangered Species Survey report has been submitted to USFWS and ODNR. Early coordination documentation with ODNR can be found in Appendix B and Terracon, at the issuance of this report, is awaiting concurrence.

New Market Solar II ■ Buford, Ohio

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6.2 Potential WOUS/ Wetlands

Ten wetlands totaling 45.78 acres were observed across the Project Site during the site reconnaissance. All on-site wetlands will likely be considered jurisdictional. Eight streams totaling 8,747 linear feet were observed across the Project Site during the site reconnaissance which will also likely be considered jurisdictional. However, newly issued regulatory guidance may determine the on-site ephemeral streams to be non-jurisdictional to the USACE. The Ohio EPA will likely take jurisdiction on these features should the USACE not. Five ponds, totaling 2.86 acres were observed during the site reconnaissance. The ponds on the Project Site appear to be jurisdictional.

6.3 Impacts to WOUS

Based on our understanding and review of the Project design, Terracon does not anticipate impacts to any of the waters on the Project Site or within the 100-foot Project buffer.

7.0 ECOLOGICAL IMPACTS

Terracon performed an ERA to evaluate the Project's potential adverse impact on natural resources. An Ecological Resources Map depicting forested/non-forested land use, water features, and potential erodible soils has been provided as Exhibit 1 in Appendix A. Based on the review of readily available published lists, files, documented resource documents, and field studies, Terracon concluded the following:

- The conversion of the Project Site from disturbed cultivated cropland to commercial solar development should have no significant or adverse impact on wildlife within the project area.
- The Project is expected to result in minimal impacts to migratory birds or Bald eagles due to the short height of proposed Project structures and minimal impacts to forest cover.
- It is Terracon's understanding that the project has been designed to fully avoid impacts to wetlands and other WOUS. As such, impacts are not anticipated. If Project Site plans change and impacts to WOUS cannot be fully avoided, permitting would be required with applicable federal and state agencies.

Suitable habitat for the federally-listed Indiana and Northern long-eared bats (as well as three state listed species) was observed within the interspersed wooded areas on the Project Site. It is Terracon's understanding that current Project design would result in minimal impacts to trees on the Project Site. Any tree clearing would likely need to be performed seasonally (from

New Market Solar II ■ Buford, Ohio

August 27, 2020 Terracon Project No. N1207316



October 1 to March 31) or additional presence/absence studies may be required. All other federal and state-listed species reviewed for this report resulted in a "no effect" finding.

7.1 Post-Construction Site Stabilization

Minimal grading and clearing are anticipated, due to the relatively flat nature of the Project Site and prior clearing and use for agriculture. Open-cut trenching and boring methods will be used to install the underground collection system. As previously noted, direct impacts to wetlands, streams, and ponds will be avoided.

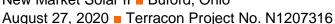
Permanent stabilization of Project Site soils through seeding will occur immediately following the completion of construction. Areas disturbed during construction activities will be seeded with a low-profile, native grass seed mix under the solar array. Select open areas outside of the solar array will be planted with a pollinator-friendly, native seed mix. Invasive and noxious plant species will be managed through mechanical methods (mowing) and application of commercially available herbicides.

The Project will be permanently stabilized when soil disturbing activities have been completed and a uniform, perennial vegetative cover density of at least 70% has been established in all Project Site areas that do not have existing permanent groundcover. All seed, straw, and/or matting used to meet Project stabilization goals will comply with Ohio stormwater standards (ODNR 2006).

8.0 REFERENCES

- The Cornell Lab of Ornithology; eBird program- Important Bird Areas. Accessed April 3, 2020 at https://www.audubon.org/important-bird-areas/cj-brown
- Endangered and Threatened Wildlife and Plants; Threatened Species Status for the Northern Long-Eared Bat With 4(d) Rule; Final Rule and Interim Rule". *Federal Register* Vol. 80, No. 63 (April 2, 2015).
- National Audubon Society; Important Bird Areas. Accessed April 3, 2020 at https://www.audubon.org/important-bird-areas/cj-brown
- Natural Resources Conservation Service. 2015. National List of Hydric Soils. Natural Resources Conservation Service-Soils. Accessed on March 30, 2020 at https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1316619.html
- Ohio Department of Natural Resources (ODNR)- Division of Wildlife (DOW). 2020. Wildlife Area Maps. Accessed on March 20, 2020 at http://wildlife.ohiodnr.gov/wildlifeareas
- Ohio Department of Natural Resources, Division of Soil and Water Conservation (ODNR), 2006. Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development, and Urban Stream Protection. 3rd Edition.

New Market Solar II ■ Buford, Ohio



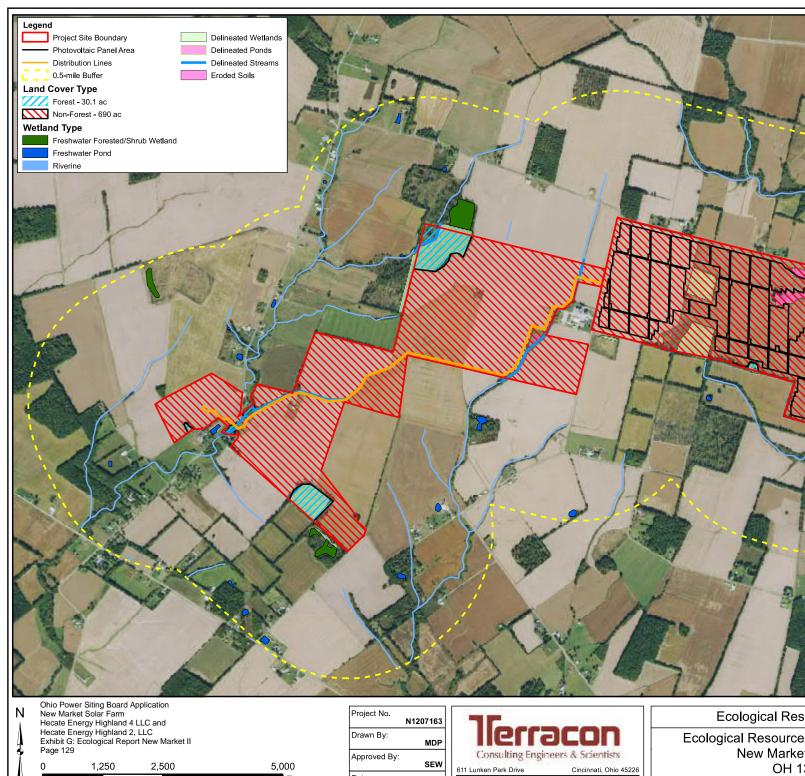


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- USFWS. April 2020. National Wetlands Inventory website. U.S. Department of Interior, Fish and Wildlife Service, Washington, D.C. Available at https://www.fws.gov/wetlands/data/mapper.html
- Yang, Limin, Suming Jin, Patrick Danielson, Collin Homer, Leila Gass, Stacie M. Bender, Adam Case, et al. 2018. "A New Generation of the United States National Land Cover Database: Requirements, Research Priorities, Design, and Implementation Strategies." ISPRS Journal of Photogrammetry and Remote Sensing 146 (August): 108–23. https://doi.org/10.1016/j.isprsjprs.2018.09.006.



APPENDIX A

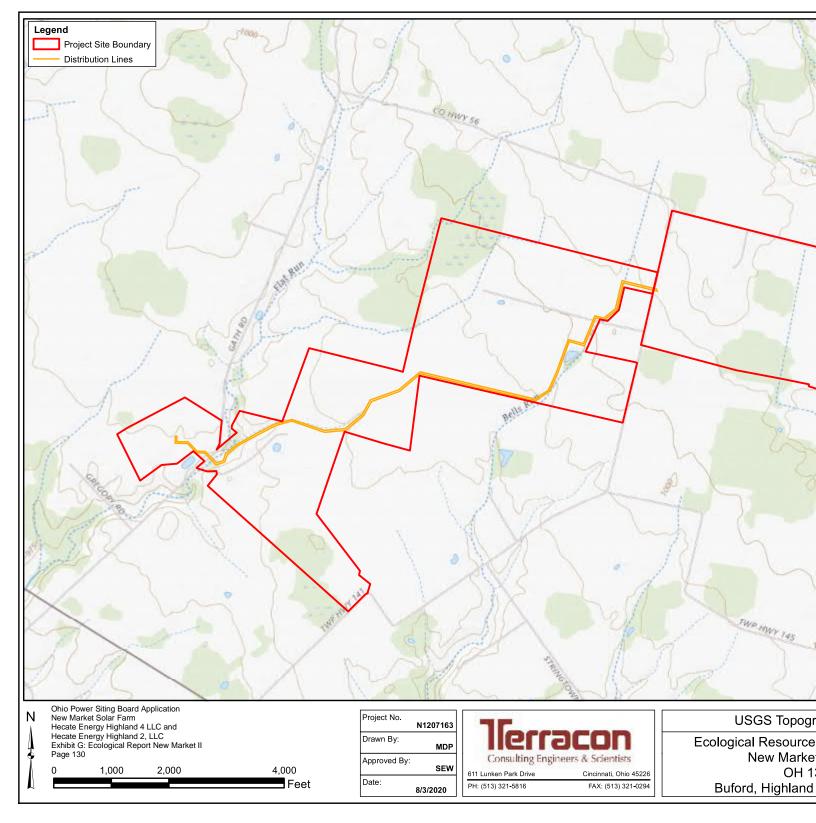


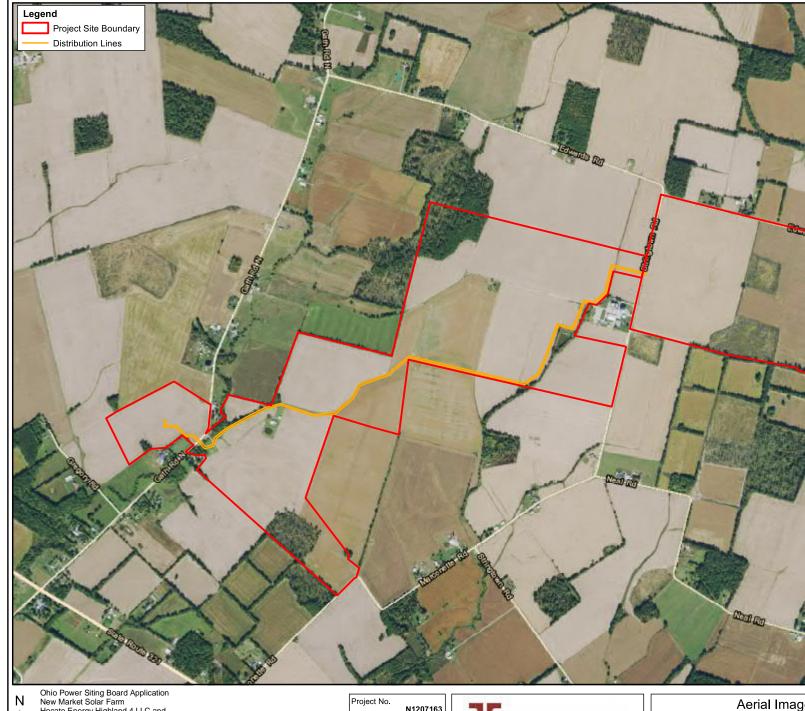
Feet

Date: 8/3/2020

PH: (513) 321-5816 FAX: (513) 321-0294

Buford, Highland





Ohio Power Siting Board Application
New Market Solar Farm
Hecate Energy Highland 4 LLC and
Hecate Energy Highland 2, LLC
Exhibit G: Ecological Report New Market II
Page 131
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Feet

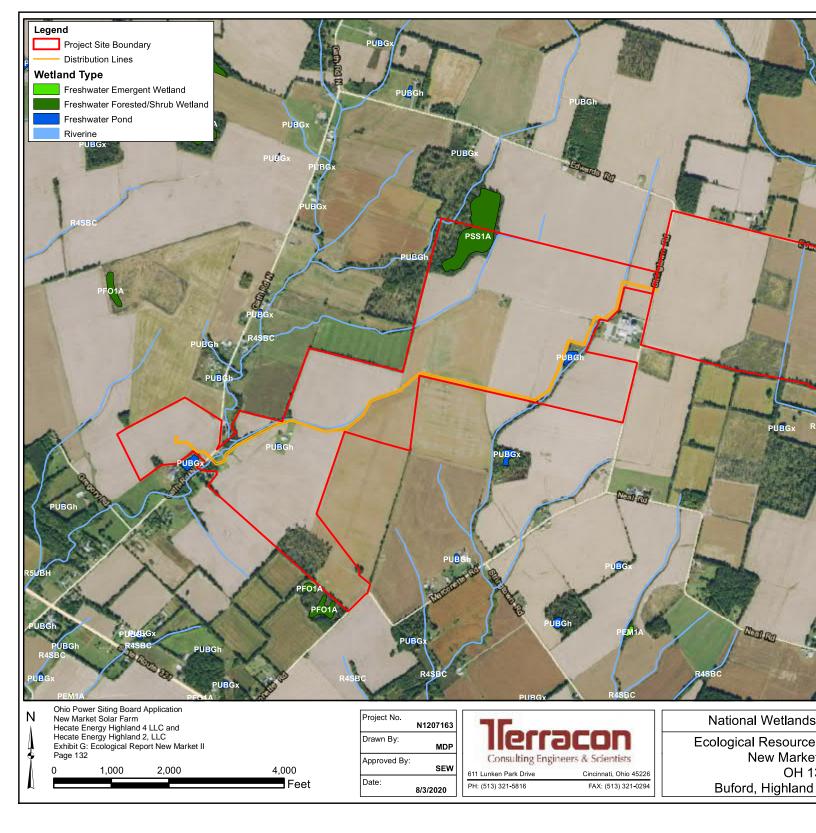
Project No. N1207163
Drawn By: MDP
Approved By: SEW
Date: 8/3/2020

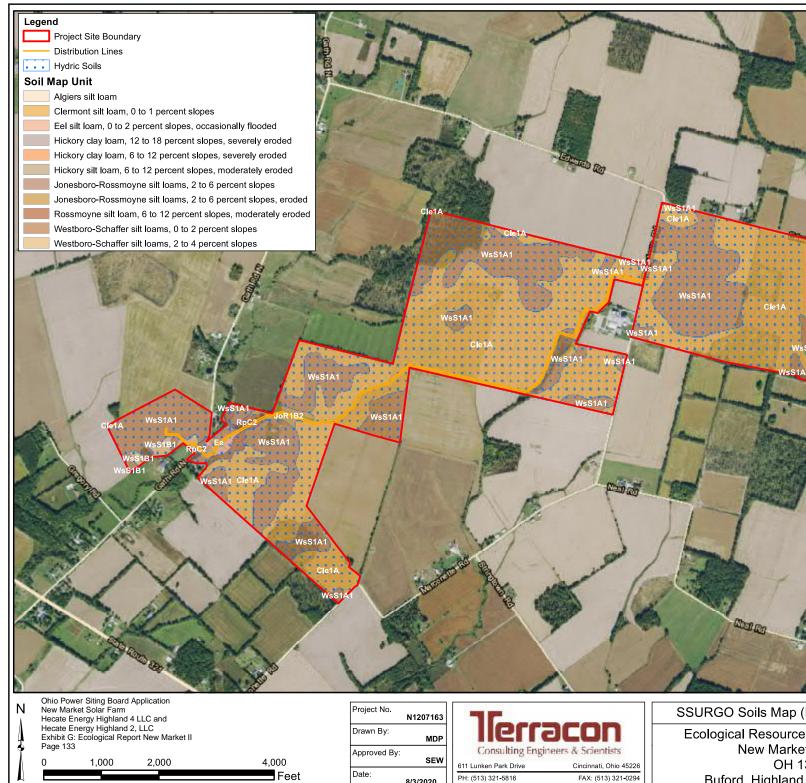
 Consulting Engineers & Scientists

 611 Lunken Park Drive
 Cincinnati, Ohio 45226

 PH: (513) 321-5816
 FAX: (513) 321-0294

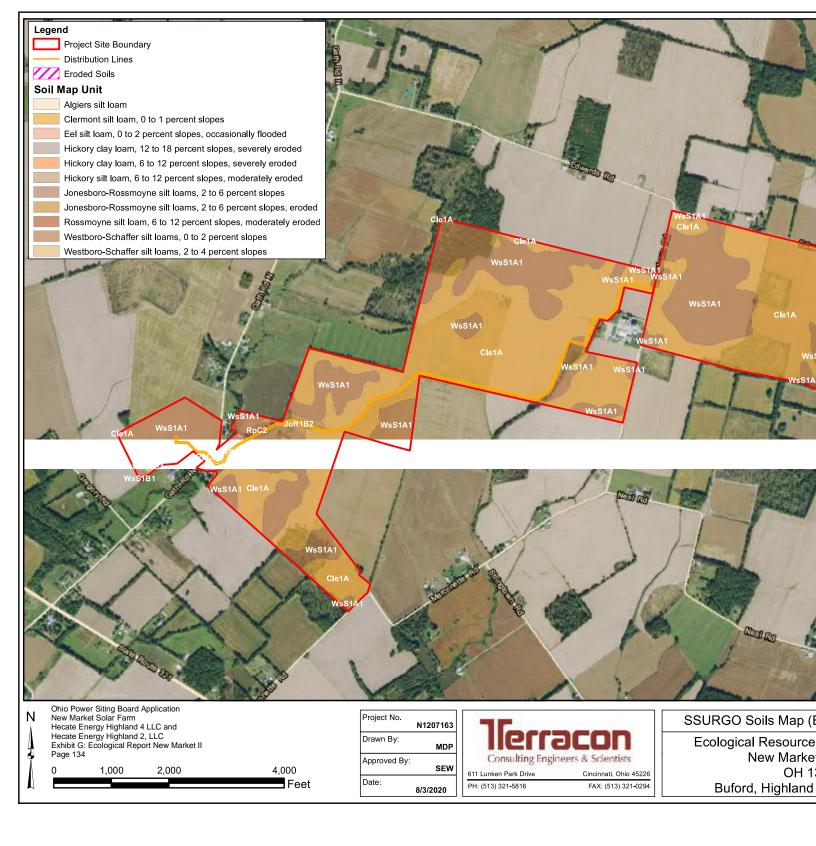
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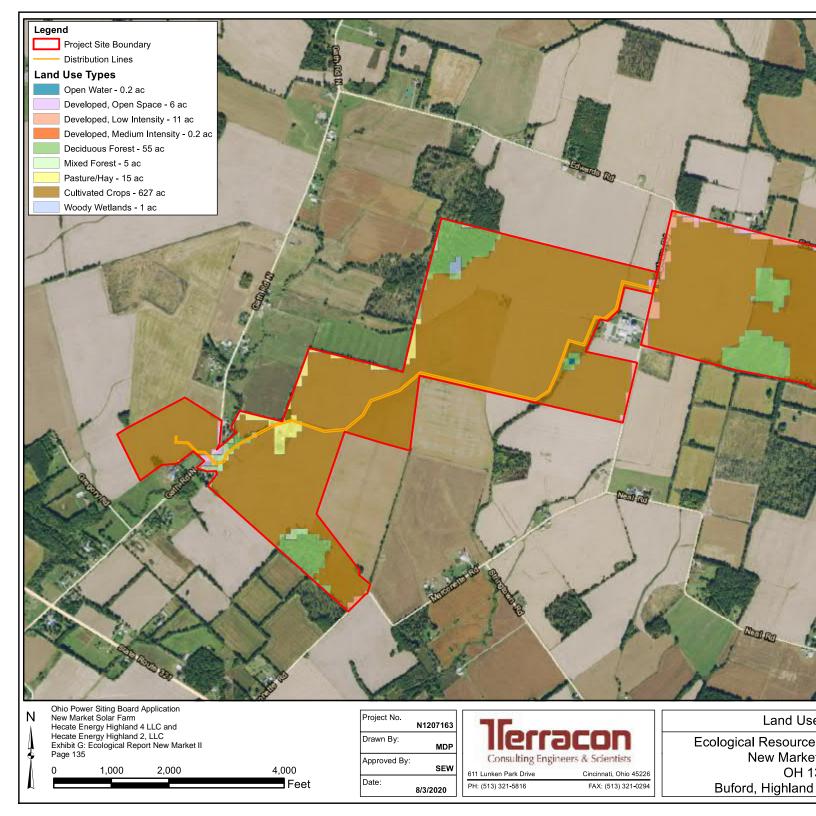


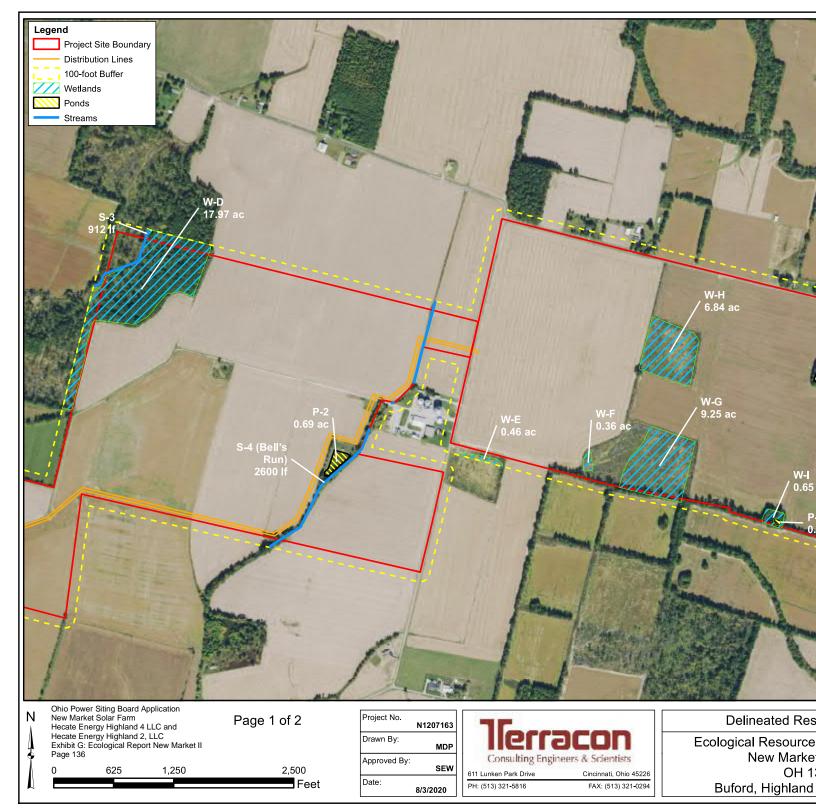


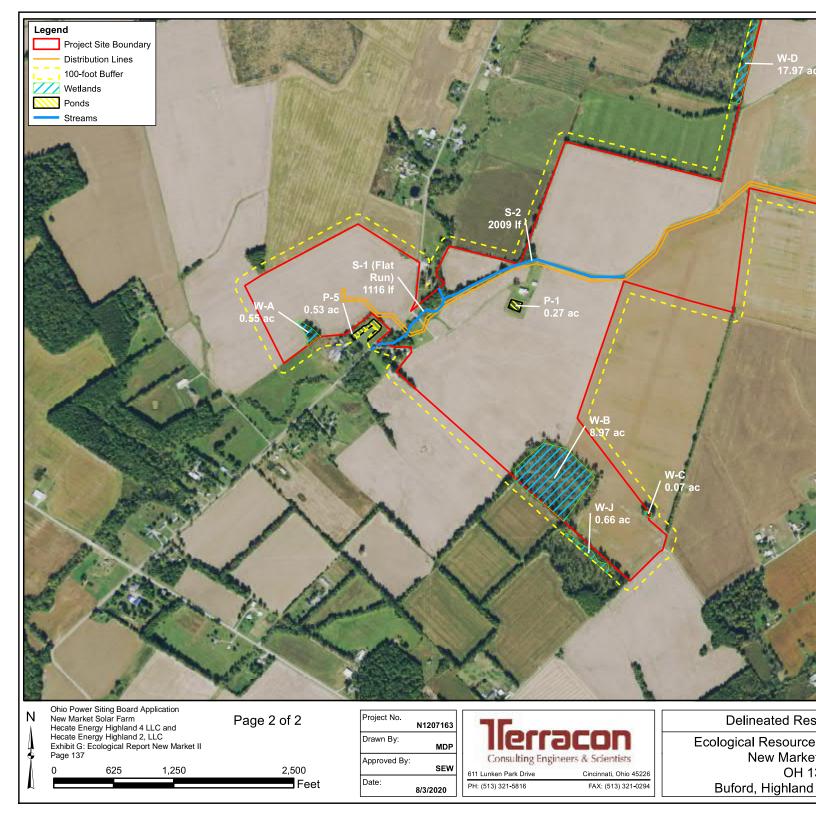
611 Lunken Park Drive Cincinnati, Ohio 45226 PH: (513) 321-5816 FAX: (513) 321-0294 8/3/2020

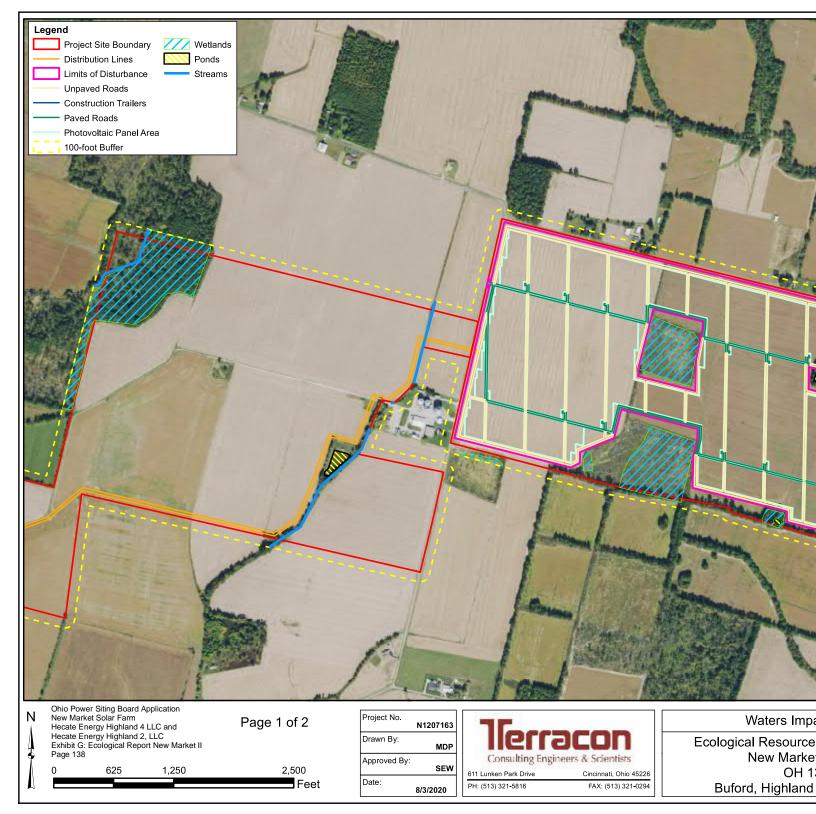
OH 1 Buford, Highland

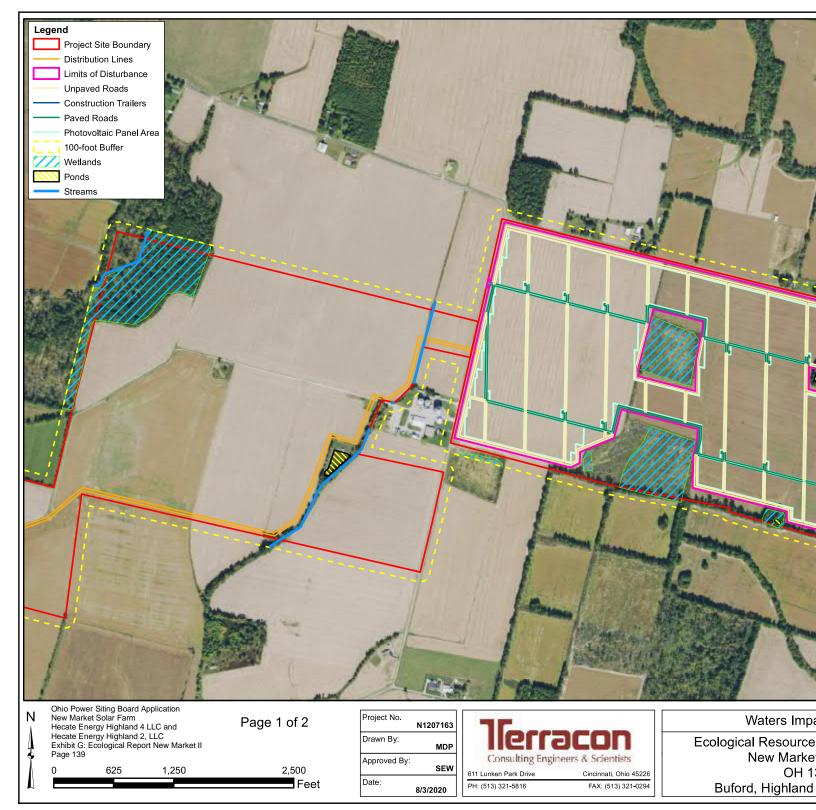


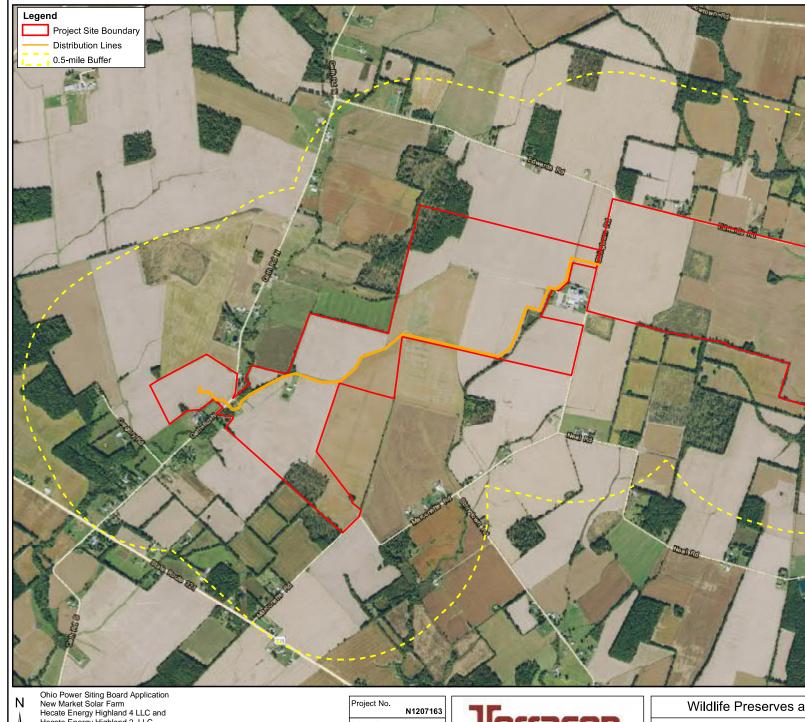












Ohio Power Siting Board Application New Market Solar Farm Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC Exhibit G: Ecological Report New Market II Page 140 1,250 2,500

5,000 Feet Drawn By: MDP Approved By: SEW Date: 8/3/2020

Consulting Engineers & Scientists 611 Lunken Park Drive Cincinnati, Ohio 45226 PH: (513) 321-5816 FAX: (513) 321-0294

Ecological Resource New Marke OH 1 Buford, Highland



APPENDIX B



August 6, 2020

Ohio Department of Natural Resources Division of Natural Areas and Preserves Ohio Natural Heritage Program 2045 Morse Road, Building F-1 Columbus, OH 43229

Re: Environmental Review Request New Market Solar II Stringtown Road Buford, Highland County, Ohio

Dear ODNR Official,

Terracon Consultants, Inc. (Terracon) is requesting an Environmental Review for an approximately proposed 721-acre solar farm development project (i.e., Proposed Highland Solar Farm) located in Buford, Highland County, Ohio. Project details are included in this letter.

Project Description

Project Purpose

The proposed solar farm development is designed to provide more sustainable energy resources and options to an area of Appalachia.

Project Location

The proposed development consists of approximately 721-acres of area predominantly occupied by row-crop agriculture. This area is located east of Buford, Ohio along portions of Stringtown Road and multiple smaller roads. Enclosed is a site location map (including portions of the USGS Sardinia and Sugar Tree Ridge, Ohio Quadrangles) showing the project location for your reference.

Site Description

The majority of the site consists of row-crop agricultural use (soybeans and corn) with small woodlots interspersed. Several streams and ponds are located across the site. A few sparse residences and barns are also located across the site. The site contains multiple streams and forested wetlands. It is Terracon's understanding that the client plans to avoid impacts to all on-site waters and the majority, if not all, on-site trees. The on-site wooded areas and wetlands have a high spatial correlation. Site plans have not been included, as the client is working on those plans to avoid existing structures and waterbodies while still meeting project needs. When a development plan is available, Terracon will be in contact with ODNR to discuss any concerns.

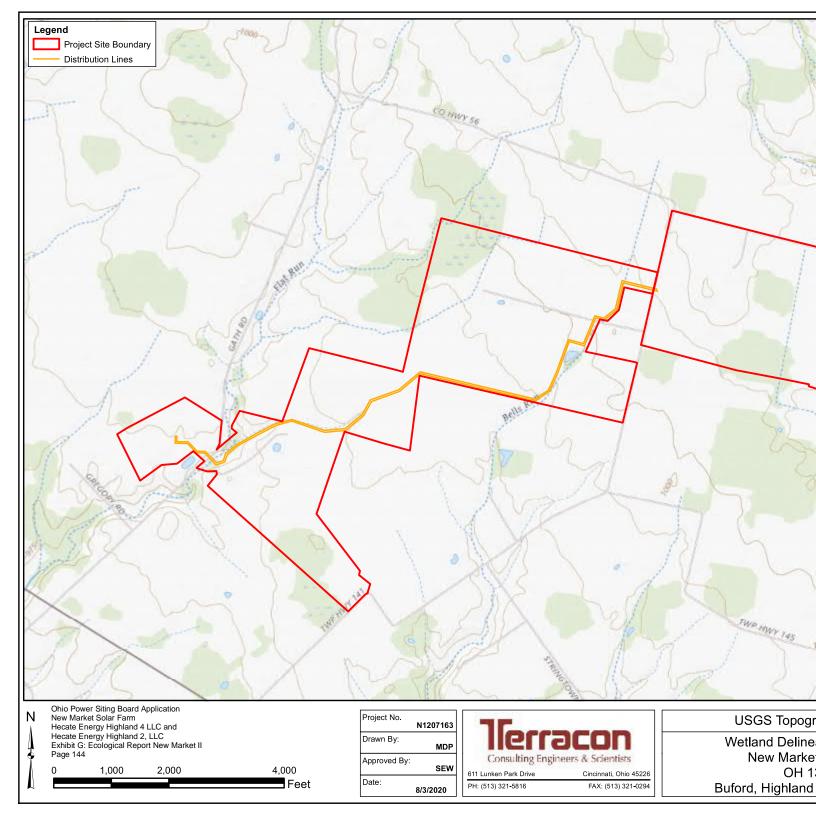
Project Equipment and Approach

Terracon understands that the client intends to perform minimal grading activities across the site in preparation for the installation of solar panel equipment. Terracon understands that best management practices for erosion control, including the use of silt fences and straw bales, will be utilized to minimize impacts to streams and/or other waterbodies.

If you have any questions, please feel free to call me at (513) 612-9175 or email at cebrendel@terracon.com. Thank you for your time and effort.

Sincerely,

Cassie Brendel
Field Scientist





August 6, 2020

U.S. Fish and Wildlife Service Ohio Ecological Services Field Office 4625 Morse Road, Suite 104 Columbus, Ohio 43230-8355

Re: Pre-Development Consultation Request

New Market Solar II Stringtown Road Buford, Highland County, Ohio Terracon Project No. N1207316

Dear USFWS Official:

Terracon Consultants, Inc. (Terracon) is requesting Pre-Development Consultation for an approximately proposed 721-acre solar farm development project (i.e., Proposed Highland Solar Farm) located in Buford, Highland County, Ohio. Project details are included in this letter.

Project Description

Project Purpose

The proposed solar farm development is designed to provide more sustainable energy resources and options to an area of Appalachia.

Project Location

The proposed development consists of approximately 721-acres of area predominantly occupied by row-crop agriculture. This area is located east of Buford, Ohio along portions of Stringtown Road and multiple smaller roads. Enclosed is a site location map (including portions of the USGS Sardinia and Sugar Tree Ridge, Ohio Quadrangles) showing the project location for your reference.

Site Description

The majority of the site consists of row-crop agricultural use (soybeans and corn) with small woodlots interspersed. Several streams and ponds are located across the site. A few sparse residences and barns are also located across the site.

Project Equipment and Approach

Terracon understands that the client intends to perform minimal grading activities across the site in preparation for the installation of solar panel equipment. Terracon understands that best management practices for erosion control, including the use of silt fences and straw bales, will be utilized to minimize impacts to streams and/or other waterbodies.

Pre-Development Consultation Request

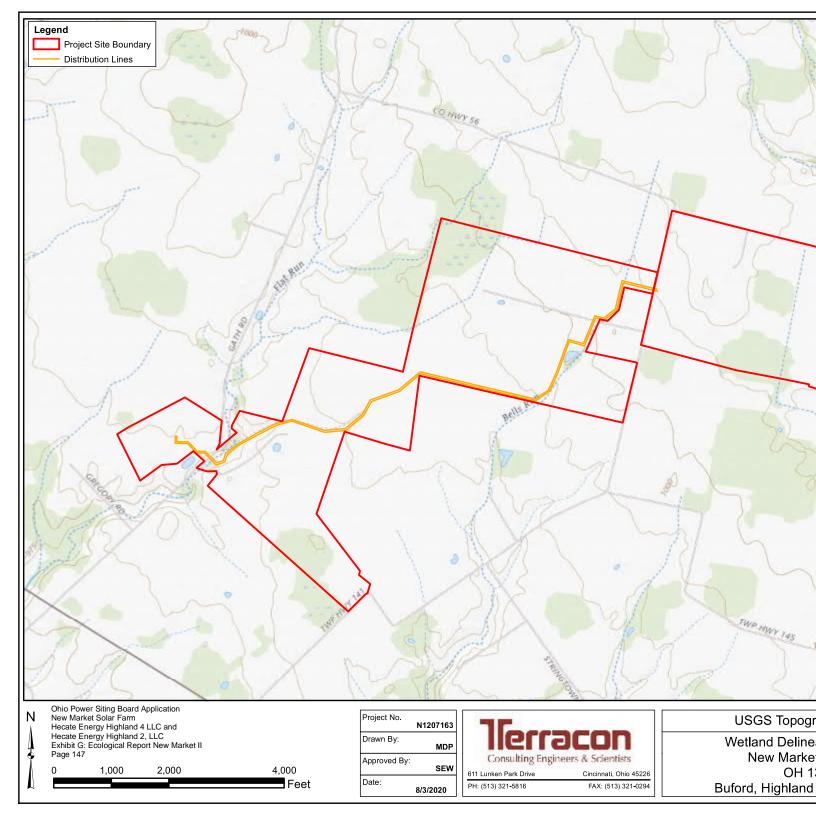
Proposed Highland Solar Farm
Buford, Highland County, Ohio ■ Terracon Project: N1177433



If you have any questions, please feel free to call me at (513) 612-9175 or email at cebrendel@terracon.com. Thank you for your time and effort.

Sincerely,

Cassie Brendel Field Scientist





DEPARTMENT OF THE ARMY

HUNTINGTON DISTRICT, CORPS OF ENGINEERS 502 EIGHTH STREET HUNTINGTON, WEST VIRGINIA 25701-2070

REPLY TO ATTENTION OF

June 12, 2020

Regulatory Division North Branch LRH-2020-436-OHR-Bells Run

PRELIMINARY JURISDICTIONAL DETERMINATION

Ms. Patti Shorr Hecate Energy Highland 2, LLC 621 Randolph Street Chicago, Illinois 60616

Dear Ms. Shorr:

I refer to your May 12, 2020 report titled *Wetland Delineation Report* (May 12, 2020 report), prepared and submitted on your behalf by Terracon Consultants, Inc., (Terracon). The subject site is on a 225 acre parcel located near Buford, in Highland County, Ohio (39.07802°N, 83.75925°W). On-site waters flow into White Oak Creek, a direct tributary of the Ohio River, a navigable water of the United States (U.S.). This preliminary jurisdictional determination (PJD) request has been assigned the following file number: LRH-2020-436-OHR-Bells Run. Please reference this file number on all future correspondence related to this PJD request.

The U.S. Army Corps of Engineers' (Corps) authority to regulate waters of the U.S. is based, in part, on the definitions and limits of jurisdiction contained in 33 CFR 328, and 33 CFR 329. Section 404 of the Clean Water Act (Section 404) requires that a Department of the Army (DA) permit be obtained prior to the discharge of dredged or fill material into waters of the U.S., including wetlands. Section 10 of the Rivers and Harbors Act of 1899 (Section 10) requires that a DA permit be obtained for any work in, on, over or under a navigable water.

Based on the review of the aquatic resources in the May 12, 2020 report, this office has determined that three (3) streams totaling 307 linear feet are located within the PJD boundary, and as described in the enclosed PJD Form. This office has determined that these waters **may** be jurisdictional waters of the U.S. in accordance with the Regulatory Guidance Letter (RGL) for JDs issued by the Corps on October 31, 2016 (RGL No. 16-01). As indicated in the guidance, this PJD is non-binding and cannot be appealed (33 CFR 331.2) and only provides a written indication that waters of the U.S., including wetlands, may be present on-site.

You have declined to exercise the option to obtain an approved JD in this instance and at this time for the aquatic resources within the PJD boundary. For the purposes of the determination of impacts, compensatory mitigation, and other resource protection measures for activities that



require authorization from this office, the aquatic resources described in the enclosed PJD Form will be evaluated as if they are waters of the U.S.

Enclosed please find two (2) copies of the PJD Form. If you agree with the findings of this PJD and understand your options regarding the same, please sign and date one (1) copy of the form and return it to this office within 30 days of receipt of this letter. You should submit the signed copy via email to kyle.m.moore@usace.army.mil or to the following address:

U.S. Army Corps of Engineers
Huntington District, Regulatory Division
Attn: Mr. Kyle Moore (LRH-2020-436-OHR-Bells Run)
502 8th Street
Huntington, West Virginia 25701

Please be advised if your proposed project is unable to avoid waters of the U.S. you must obtain written authorization from this office prior to the discharge of dredged and/or fill material into these aquatic resources. If you have any questions concerning the above, please contact Mr. Kyle Moore at (513) 825-3444 or by email at kyle.m.moore@usace.army.mil

Sincerely,

Laurie Moore

Laurie A. Moore Regulatory Project Manager North Branch

Enclosures cc: via email Ms. Cassie Brendel Terracon Consultants, Inc. cassandra.brendel@terracon.com

Appendix 2 - PRELIMINARY JURISDICTIONAL DETERMINATION (PJD) FORM

BACKGROUND INFORMATION

- A. REPORT COMPLETION DATE FOR PJD: June 12, 2020
- B. NAME AND ADDRESS OF PERSON REQUESTING PJD: Ms. Patti Shorr Hecate Energy Highland 2, LLC 621 Randolph Street Chicago, Illinois 60616
- C. DISTRICT OFFICE, FILE NAME, AND NUMBER: LRH-2020-436-OHR-Bells Run
- D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION:
 (USE THE TABLE BELOW TO DOCUMENT MULTIPLE AQUATIC RESOURCES AND/OR AQUATIC RESOURCES AT DIFFERENT SITES)

State: Ohio County/parish/borough: Highland City: Buford

Center coordinates of site (lat/long in degree decimal format):

Lat.: 39.07802 Long.: -83.75925

Universal Transverse Mercator: NAD83

Name of nearest waterbody: White Oak Creek

- E. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):
 - Office (Desk) Determination. Date: June 11, 2020

Field Determination. Date(s):

TABLE OF AQUATIC RESOURCES IN REVIEW AREA WHICH "MAY BE" SUBJECT TO REGULATORY JURISDICTION.

Site number	Latitude (decimal degrees)	Longitude (decimal degrees)	Estimated amount of aquatic resource in review area (acreage and linear feet, if applicable)	Type of aquatic resource (i.e., wetland vs. non-wetland waters)	Geographic authority to which the aquatic resource "may be" subject (i.e., Section 404 or Section 10/404)
Stream 1	39.07897	-83.76933	30 linear feet	Non-wetland	Section 404
Stream 2	39.07193	-83.78647	163 linear feet	Non-wetland	Section 404
Stream 3	39.07193	-83.78647	114 linear feet	Non-wetland	Section 404

- 1) The Corps of Engineers believes that there may be jurisdictional aquatic resources in the review area, and the requestor of this PJD is hereby advised of his or her option to request and obtain an approved JD (AJD) for that review area based on an informed decision after having discussed the various types of JDs and their characteristics and circumstances when they may be appropriate.
- 2) In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring "preconstruction notification" (PCN), or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an AJD for the activity, the permit applicant is hereby made aware that: (1) the permit applicant has elected to seek a permit authorization based on a PJD, which does not make an official determination of jurisdictional aquatic resources; (2) the applicant has the option to request an AJD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an AJD could possibly result in less compensatory mitigation being required or different special conditions; (3) the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) undertaking any activity in reliance upon the subject permit authorization without requesting an AJD constitutes the applicant's acceptance of the use of the PJD; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a PJD constitutes agreement that all aquatic resources in the review area affected in any way by that activity will be treated as jurisdictional, and waives any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an AJD or a PJD, the JD will be processed as soon as practicable. Further, an AJD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331. If, during an administrative appeal, it becomes appropriate to make an official determination whether geographic jurisdiction exists over aquatic resources in the review area, or to provide an official delineation of jurisdictional aquatic resources in the review area, the Corps will provide an AJD to accomplish that result, as soon as is practicable. This PJD finds that there "may be" waters of the U.S. and/or that there "may be" navigable waters of the U.S. on the subject review area, and identifies all aquatic features in the review area that could be affected by the proposed activity, based on the following information:

SUPPORTING DATA. Data reviewed for PJD (check all that apply)

Checked items should be included in subject file. Appropriately reference sources

below where indicated for all checked items: Maps, plans, plots or plat submitted by or on behalf of the PJD requestor: Map: Exhibit 6 - Wetland Delineation Map ■ Data sheets prepared/submitted by or on behalf of the PJD requestor. Office concurs with data sheets/delineation report. ☐ Office does not concur with data sheets/delineation report. Rationale: Wetland Delineation Report dated May 12, 2020 Data sheets prepared by the Corps: ______ U.S. Geological Survey Hydrologic Atlas: _____ ☐ USGS NHD data. USGS 8 and 12 digit HUC maps. ■ U.S. Geological Survey map(s). Cite scale & quad name: Ohio 1:24K - Sardinia Natural Resources Conservation Service Soil Survey. Citation: In report referenced above. ■ National wetlands inventory map(s). Cite name: _In report referenced above. State/local wetland inventory map(s): FEMA/FIRM maps: In report referenced above. 100-year Floodplain Elevation is: _____ .(National Geodetic Vertical Datum of 1929) Photographs: Aerial (Name & Date): In report referenced above. Other (Name & Date): In report referenced above. Previous determination(s). File no. and date of response letter: _____ Other information (please specify): _____ IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations. Signature and date of Signature and date of Regulatory staff member person requesting PJD completing PJD (REQUIRED, unless obtaining the signature is impracticable)¹

Ohio Power Siting Board Application New Market Solar Farm Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC Exhibit G: Ecological Report New Market II Page 152

¹ Districts may establish timeframes for requestor to return signed PJD forms. If the requestor does not respond within the established time frame, the district may presume concurrence and no additional follow up is necessary prior to finalizing an action.



APPENDIX C



August 6, 2020

Hecate Energy Highland 2, LLC 621 Randolph Street Chicago, Illinois 60661

Attn: Ms. Patti Shorr

P: (614) 205-3798

E: PShorr@HecateEnergy.com

Re: Wetland Delineation Report

New Market Solar II Site

Stringtown Road

Buford, Highland County, Ohio Terracon Project No. N1207316

Dear Ms. Shorr:

Terracon is pleased to submit the wetland delineation report for the above referenced project. Based on the results of the assessment, Terracon observed eight wetlands, eight streams, and four ponds on the project site.

A cover letter addressed to the U.S. Army Corps of Engineers (USACE) has been included with the enclosed report; however, a copy of this report has not been provided to USACE by Terracon. A copy of the wetland delineation report and attached letter should be submitted to USACE for review and concurrence. The USACE can be reached at the following address:

US Army Corps of Engineers – Huntington District ATTN: Regulatory Branch 502 Eighth Street Huntington, WV 25701-2070

Terracon appreciates the opportunity to have worked for you on this project. If you have any questions regarding the content of this report, please contact me at (513) 612-9094 or via email at swest@terracon.com.

Sincerely,

TERRACON Consultants, Inc.

Cassie Brendel Field Scientist

Scott E. West Group Manager

New Market Solar II Site Stringtown Road Buford, Highland County, Ohio

Date: August 6, 2020 Terracon Project No. N1207316



Prepared for:

Hecate Energy Highland 2, LLC Chicago, Illinois

Prepared by:

Terracon Consultants, Inc. Cincinnati, Ohio

terracon.com

Ohio Power Siting Board Application lew Market Solar Farm Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC Exhibit G: Ecological Report New Market II

Environmental



Facilities

Geotechnical

Materials



August 6, 2020

US Army Corps of Engineers – Huntington District ATTN: Regulatory Branch 502 Eighth Street Huntington, WV 25701-2070

Re: Wetland Delineation Report

New Market Solar II Site

Stringtown Road

Buford, Highland County, Ohio Terracon Project No. N1207316

Regulatory Branch:

Terracon is pleased to submit the wetland delineation report prepared for Hecate Energy Highland 2, LLC for the above-mentioned project. This assessment describes the observations made during our site visit and other sources of information used to investigate the project site for wetlands and other waterbodies. Based on the results of the assessment, eight wetlands, eight streams, and four ponds are present at the project site. At this time, we are requesting that your office perform a review of the report for the project site and advise our client if a permit will be required for any proposed activities.

If you have any questions concerning this report, please contact Scott West at (513) 612-9094 or by e-mail at swest@terracon.com.

Sincerely,

TERRACON Consultants, Inc.

Cassie Brendel Scott E. West Field Scientist Group Manager

Copy to: Ms. Patti Shorr

Hecate Energy Highland 2, LLC

621 Randolph Street Chicago, Illinois 60661

Ohio Power Siting Board Application New Market Solar Farm Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC Exhibit G: Ecological Report New Market II Page 156

Terracon Consultants Inc. 611 Lunken Park Drive Cincinnati, OH 45226-1813

P 513-321-5816 F 513-321-0294 terracon.com

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Wetland Delineation Report New Market Solar II Site Stringtown Road Buford, Highland County, Ohio Terracon Project No. N1207316 August 6, 2020

1.0 INTRODUCTION

Terracon Consultants, Inc. (Terracon) was retained by Hecate Energy Highland 2, LLC (client) to perform a wetland delineation to determine if wetlands or other waters under the jurisdiction of the United States Army Corps of Engineers (USACE) or the Ohio Environmental Protection Agency (OEPA) are present at the approximately 721-acre property, hereafter referred to as the project site. The project site is located on the southeast corner of the intersection of Stringtown Road and Edwards Road, near Buford, Highland County, Ohio. The project site location is depicted on Exhibits 1 and 4 in Appendix A.

The purpose of performing this wetland delineation of the project site was to characterize the existing site conditions, observe the project site for suspect waterbodies and wetlands and provide a recommendation regarding whether or not suspect waterbodies (if observed) would be considered jurisdictional with the USACE.

It is important to note that the findings presented in this report represent Terracon's professional opinion, based upon field observations made during the site visit and our experience with current regulatory guidance under the Clean Water Act. In order to verify the delineation boundaries and jurisdictional classifications presented in this report, the USACE must review this report and make a jurisdictional determination.

2.0 SCOPE OF SERVICES

Terracon performed the following scope of work:

- Reviewed United States Geologic Survey (USGS) topographical maps, National Wetlands Inventory (NWI) maps, United States Department of Agriculture (USDA) National Resource Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO) soil maps and surveys, Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), and aerial photographs to assist with identifying suspect Waters of the US (WOUS) and wetland areas at the project site.
- Mobilized to the project site to conduct the preliminary site visit.
- Prepared a map showing approximate locations of suspect waterbodies or wetland areas observed during the site visit, if any.

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 Completed a wetland delineation report that included site characterization information, a discussion of applicable data, and recommendations for the project site.

3.0 PRELIMINARY DATA GATHERING AND ANALYSIS

Prior to performing the delineation, several map and aerial photograph resources were reviewed to assist with identifying potential wetland areas at the project site. Each source of data is described in detail below.

3.1 Topographic Map

The United States Department of the Interior Geologic Survey (USGS) 7.5-Minute Topographic Map of the project site was reviewed to identify drainages or potential wetlands within the project site. The project site appears to be relatively flat, averaging approximately 1,000 feet above sea level (asl). The USGS map indicates the presence of six intermittent streams and five ponds across the project site. A portion of the Buford, Ohio Quadrangle can be seen as Exhibit 1 in Appendix A.

3.2 National Wetlands Inventory Map

The National Wetlands Inventory (NWI) Map of the project site was reviewed to identify potential wetland areas. The map for the project site was published by the U.S. Department of the Interior's Fish and Wildlife Service and depicts probable wetland areas based on stereoscopic analysis of high-altitude aerial photographs and analysis of infrared bands from remotely-sensed imagery. The NWI map depicts six intermittent streams (R4SBC), four ponds, and one emergent wetland (PSSIA) across the project site. The NWI map for the project site is included as Exhibit 2 in Appendix A.

3.3 Soil Survey

Data from the soil survey of Highland County, Ohio was reviewed to identify soil types, including hydric soils. Data for the soil survey was compiled by the U.S. Department of Agriculture Natural Resource Conservation Service (NRCS), in 1977. Hydric soils information was gathered from the 'National Hydric Soils List' (USDA Natural Resource Conservation Service, https://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/use/hydric/). A soil survey map is included as Exhibit 3 in Appendix A.

The following soil types were identified within the project site boundaries on the soil survey map:

Algiers silt loam (Ag): This soil is defined as somewhat poorly drained, nearly level, and typically located in flood plains. The soil color is typically dark grayish brown. This map unit is classified as hydric.

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- Clermont silt loam, 0 to 1 percent slopes (Cle1A): This soil is defined as somewhat poorly to poorly drained and nearly level. The soil color is typically grayish brown. This map unit is classified as hydric.
- <u>Eel silt loam, 0 to 2 percent slopes, occasionally flooded (Ee)</u>: This soil is defined as well drained to very poorly drained and is typically found in flood plains. The soil color ranges from yellowish brown to dark grayish brown. This map unit is classified as hydric.
- Hickory clay loam, 12 to 18 percent slopes, severely eroded (HyD3): This soil is defined as moderately well to well drained and is typically found in narrow bands along streams and at the end of waterways and stream outlets. The soil color ranges from dark grayish-brown with yellowish-brown mottles to dark yellowish brown. This map unit is not classified as hydric.
- Hickory clay loam, 6 to 12 percent slopes, severely eroded (HyC3): This soil is defined as moderately well to well drained and is typically found in narrow bands along streams and at the head of waterways. The soil color ranges from dark grayish-brown with yellowish-brown mottles to dark yellowish brown. This map unit is not classified as hydric.
- Hickory silt loam, 6 to 12 percent slopes, moderately eroded (HkC2): This soil is defined as moderately well to well drained and is typically found in narrow bands along streams and slope breaks. The soil color ranges from dark grayish-brown with yellowish-brown mottles to dark yellowish brown. This map unit is not classified as hydric.
- Jonesboro-Rossmoyne silt loams, 2 to 6 percent slopes (JoR1B1): This soil is defined as moderately well drained, gently sloping to sloping, and is typically found along drainageways. The soil color ranges from dark grayish brown to yellowish-brown. This map unit is not classified as hydric.
- Jonesboro-Rossmoyne silt loams, 2 to 6 percent slopes, eroded (JoR1B2): This soil is defined as moderately well drained, gently sloping to sloping, and is typically found along drainageways. The soil color ranges from dark grayish brown to yellowish-brown. This map unit is not classified as hydric.
- Rossmoyne silt loam, 6 to 12 percent slopes, moderately eroded (RpC2): This soil is defined as moderately well drained, sloping, and is typically found along drainageways. The soil color ranges from dark grayish brown to yellowish-brown. This map unit is not classified as hydric.
- Westboro-Schaffer silt loams, 0 to 2 percent slopes (WsS1A1): This soil is defined as somewhat poorly drained, nearly level, and typically found in till plains. The soil color ranges from dark grayish brown to yellowish brown. This map unit is classified as hydric.
- Westboro-Schaffer silt loams, 2 to 4 percent slopes (WsS1B1): This soil is defined as somewhat poorly drained, gently sloping, and is typically found in till plains. The soil color ranges from dark grayish brown to yellowish brown. This map unit is classified as hydric.

3.4 Aerial Photographs

A recent aerial photograph (2019) of the project site was reviewed to determine land use and evaluate vegetative cover. The project site is predominantly depicted as agricultural land, with small pockets of forested land. The aerial photograph is included as Exhibit 4 in Appendix A.

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3.5 FEMA FIRM Data

Terracon reviewed FEMA FIRM data (Panel #s 39015C0175D, effective 09/29/2010; and 39071C0350E, effective 03/03/2011) to identify areas that may have elevated likelihoods of containing WOUS. The FEMA FIRM data indicated that the entirety of the project site is in Zone X, an area of minimal flood hazard. This data is included as Exhibit 5 in Appendix A.

4.0 FIELD TECHNIQUES

Terracon personnel, Michael Perkins, Cassandra Brendel, and Scott West, conducted a reconnaissance of the project site on December 14, 15, 19, and 20, 2017, January 24, July 11, 12, December 5, 13, 2018, and August 8 and 13, 2019 to characterize the existing site conditions and observe for the presence of wetlands and potential jurisdictional waters. Characteristics of jurisdictional waters and wetland areas were assessed utilizing the criteria detailed in sections 4.1 and 4.2 of this report. The evaluation methods generally followed the routine on-site determination method referenced in the 1987 USACE Manual and 2010 Midwest Regional Supplement.

4.1 Wetland Observations

Wetlands generally have three essential characteristics: hydrophytic (wetland) vegetation, hydric soils, and wetland hydrology. Based on NWI data, aerial imagery and topographical data, on-site areas were investigated for potential wetland properties. Additional areas were investigated, based on observations made during the site reconnaissance. Data regarding the three essential characteristics was gathered within observed suspect wetland areas to further delineate boundaries.

4.1.1. Plant Community Assessment

Suspect areas were visually observed to determine the species, when possible, and absolute percentage of ground cover for four stratum of plant community types. Herbs were generally observed within a five-foot radius, shrubs/saplings within a fifteen-foot radius, and trees and vines within a thirty-foot radius of the observation location.

For each species of vegetation observed, their wetland indicator status was evaluated. Indicator status was determined using the NRCS Plants Database. Indicator categories for vegetation are presented below:

 Obligate Wetland (OBL) - occur almost always (estimated probability greater than 99%) under natural conditions in wetlands.

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- Facultative Wetland (FACW) usually occur in wetlands (estimated probability 67% -99%) but occasionally found in non-wetlands.
- Facultative (FAC) equally likely to occur in wetlands or non-wetlands (estimated probability 34% - 66%).
- Facultative Upland (FACU) usually occur in non-wetlands (estimated probability 67%
 99%) but occasionally found in wetlands.
- Obligate Upland (UPL) rarely occur in wetlands but occur almost always (estimated probability greater than 99%) under natural conditions in non-wetlands.

The percent cover of each stratum was determined, and dominance was evaluated. Dominant species were the most abundant species that accounted for more than 20 percent of the absolute percent coverage of the stratum. The number of dominant species with an indicator status of OBL, FACW, and/or FAC was compared to the total number of dominant species across all strata. Typically, when more than 50 percent of the dominant species had an indicator status of OBL, FACW, and/or FAC, hydrophytic vegetation was present.

If the percentage of dominant species with an indicator status of OBL, FACW, and/or FAC was less than 50 percent, prevalence index and morphological adaptations may have been evaluated to confirm if hydrophytic vegetation was present or absent.

4.1.2 Hydric Soils Assessment

After Terracon evaluated wetland vegetation, subsurface soil samples were collected using a soil probe or similar method. The samples were collected to a depth of approximately 15 inches below ground surface and were visually compared to Munsell Soil Color Charts (Munsell, 2009), which aided in the evaluation of hydric soil characteristics. The soil samples were further examined for hydric soil indicators including, but not limited to, histosol, thick dark surface, sandy gleyed matrix, sandy redox, loamy gleyed matrix, redox dark surface, and/or redox depressions. If these or other hydric soil indicators were observed in the subsurface soil sample, the observation location was considered to have hydric soil.

4.1.3 Wetland Hydrology Assessment

Visual indicators of wetland hydrology were evaluated. Examples of primary wetland hydrology indicators include, but are not limited to, surface water, high water table, soil saturation, water marks, sediment deposits, drift deposits, iron deposits, inundation visible on aerial imagery, sparsely vegetated concave surface, and water-stained leaves. If at least one primary or two secondary indicators were observed, the observation location was considered to have wetland hydrology.

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4.1.4 Classification of Wetlands

Upon completion of the review of the three wetland criteria at each area, a wetland determination was made. Under normal circumstances, if one or more of the wetland criteria were not identified, the area was not considered to be a wetland. If all three wetland indicators were identified, the area was classified as wetland. Additional observations were made throughout the wetland area to define the wetland/non-wetland boundary. Vegetation, soil and hydrology assessment data from at least one location within the wetland and one upland location outside of the wetland were recorded on a USACE Wetland Determination Form (Data Sheet).

4.2 Other Waters Observations

Terracon also made observations of site features that may be considered a jurisdictional waterbody. If a potential jurisdictional waterbody was identified, observations regarding its characteristics were recorded. Potential jurisdictional waterbodies were evaluated based on the observation of the following characteristics:

Flow Characteristics:

- o Perennial: contains water at all times except during extreme drought.
- Intermittent: carries water a considerable portion of the time but ceases to flow occasionally or seasonally.
- Ephemeral: carries water only during and immediately after periods of rainfall or snowmelt.

Ordinary High-Water Mark:

The limit line on the shore established by the fluctuation of the water surface. It is shown by such things as a clear line impressed on the bank, shelving, changes in soil character, destruction of terrestrial vegetation, the presence of litter and debris or other features influenced by the surrounding area.

Bank Shape Descriptions:

- Undercut: banks that overhang the stream channel
- Steep: bank slope of approximately greater than 30 degrees
- Gradual: bank slope of approximately 30 degrees or less

Aquatic Habitat Descriptions:

- Pool: deeper portion of a stream where water flows slower than in neighboring, shallower portions, smooth surface, and finer substrate
- Riffle: shallow area in a stream where water flows swiftly over gravel and rock or other coarse substrate resulting in a rough flow and a turbulent surface
- Run: section of a stream with a low or high velocity and with little or no turbulence on the surface of the water.

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5.0 FIELD OBSERVATIONS RESULTS

On December 14, 15, 19, and 20, 2017, January 24, July 11, and July 12, 2018, August 9, 2019, January 8 and April 22, 2020. Terracon performed field observations at the project site. The project site consisted primarily of forested and agricultural land. Ground photographs, included in Appendix B, provide an indication of the physical characteristics observed during the site visit. Descriptions of the observed areas are listed in the following sections.

5.1 Plant Communities Found at Project Site

5.1.1 Forested Wetlands

The dominant plant species observed in the forested wetland areas were pin oak (*Quercus palustris*), red maple (*Acer rubrum*), American beech (*Fagus grandifolia*), swamp white oak (*Quercus bicolor*), sycamore (*Platanus occidentalis*), sweetgum (*Liquidambar styraciflua*), American elm (*Ulmus americana*), blackgum (*Nyssa sylvatica*), spicebush (*Lindera benzoin*), lurid sedge (*Carex lurida*), softstem bulrush (*Schoenoplectus tabernaemontani*), Allegheny blackberry (*Rubus allegheniensis*), woolgrass (*Scirpus cyperinus*), Virginia rye grass (*Elymus virginicus*), and greenbrier (*Smilax rotundifolia*).

5.1.2 Emergent Wetlands

The dominant plant species observed in the emergent wetland areas were panic grass (*Panicum virgatum*), Gray's sedge (*Carex grayi*), squarrose sedge (*Carex squarrosa*), greater bladder sedge (*Carex intumescens*), touch-me-nots (*Impatiens capensis*), soft rush (*Juncus effusus*), sensitive fern (*Onoclea sensibilis*), white grass (*Leersia virginica*), fox sedge (*Carex vulpinoidea*), square-pod water-primrose (*Ludwigia alternifolia*), green bulrush (*Scirpus atrovirens*), and softstem bulrush.

5.1.3 Forested Uplands

The dominant plant species observed in the forested upland areas were white oak (*Quercus alba*), shagbark hickory (*Carya ovata*), American beech, red maple, pawpaw (*Asimina triloba*), northern red oak (*Quercus rubra*), poison ivy (*Toxicodendron radicans*), greenbrier, Allegheny blackberry, lurid sedge, and multiflora rose (*Rosa multiflora*).

5.1.4 Agricultural Uplands

The dominant plant species observed in the agricultural upland areas were the remnants of corn (*Zea mays*) and soybeans (*Glycine max*) that have been recently harvested.

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5.2 Wetland Area Descriptions

The following wetlands were observed on site during the site reconnaissance.

Wetland	Size (acres)	Cowardin Classification	Water Sources	USACE Jurisdictional (Y/N)
Α	8.82	PFO	Precipitation, Surface Runoff	N
В	0.05	PFO	Precipitation, Surface Runoff	N
С	0.36	PFO	Precipitation, Surface Runoff	N
D	13.6	PFO	Precipitation, Surface Runoff, Stream 1	Υ
E	0.55	PFO	Precipitation, Surface Runoff	N
F	6.84	PEM/PFO	Precipitation, Surface Runoff	N
G	8.88	PEM/PFO	Precipitation, Surface Runoff	N
н	0.58	PFO	Precipitation, Surface Runoff, Pond 3	N
TOTAL	39.68 acres			

PEM - Palustrine emergent wetland, PFO - Palustrine forested wetland, PSS - Palustrine scrub-shrub wetland

Terracon considers Wetland D jurisdictional based on its significant nexus to the off-site stream, White Oak Creek. Wetlands A, B, C, E, F, G, and H do not appear to have any significant nexus to on-or-off-site waters; therefor, Terracon considers these wetlands non-jurisdictional. This decision is based on 33 CFR 328.3(b)(1), which includes waters or water features that are not identified in 33 CFR 328.3(a)(1), (2), (3), or (4).

5.3 Streams

The following streams were observed at the project site during the site reconnaissance.

Streams	Length (linear feet)	Flow Regime	Average Stream Width at Top of Bank (feet)
1	600	Intermittent	6-8
2 (Bell's Run)	1,689	Intermittent	7-9
3 (Flat Run)	996	Intermittent	6-8
4	2,000	Intermittent	6-8
5	131	Ephemeral	3-5
6	904	Ephemeral	3-5
7	229	Intermittent	3-5
8	169	Ephemeral	3-5
TOTAL	6,718 linear feet		

Terracon considers Streams 1, 2, 3, 4, and 7 jurisdictional based on their significant nexus and connection as tributaries to the off-site stream, White Oak Creek. Terracon considers Streams 5, 6, and 8 non-jurisdictional based on their status as ephemeral. This decision is based on 33 CFR

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328.3(b)(3), which states that ephemeral features include ephemeral streams, swales, gullies, rills, and pools.

5.4 Other Waters

Other waters (ponds) were observed at the project site during the site reconnaissance:

Pond	Size (acres)	Cowardin Classification	WATER SOURCES	USACE JURISDICTIONAL (Y/N)
1	0.27	PUBH	Precipitation, Surface Runoff	N
2	0.26	PUBH	Precipitation, Surface Runoff	N
3	0.11	PUBH	Precipitation, Surface Runoff	N
4	0.69	PUBH	Precipitation, Surface Runoff, Stream 2	Υ
TOTAL	1.33 acres			

Terracon considers Pond 4 jurisdictional based on its significant nexus to Stream 2 (Bell's Run). Ponds 1, 2, and 3 do not appear to have significant nexus to on or off-site streams; therefor, Terracon considers these ponds non-jurisdictional.

6.0 SUMMARY AND CONCLUSIONS OF FIELD OBSERVATIONS

A wetland delineation was conducted at an approximately 721-acre site located near Buford, Ohio on December 14, 15, 19, and 20, 2017, January 24, July 11, and July 12, 2018, August 9, 2019, January 8 and April 22, 2020. A review of the project site was conducted utilizing readily available information including, but not limited to, topographical, aerial, soils, floodplain, and wetland data. In addition, a preliminary site visit was performed to characterize the existing site conditions and observe the project site for suspect waterbodies and wetlands (if any). A summary of field observations and conclusions concerning jurisdictional status is outlined in the following sections.

6.1 Wetlands

Eight (8) wetlands, totaling 39.68 acres, were observed across the project site during the site reconnaissance. Terracon considers the on-site wetlands jurisdictional based on their significant nexus to the off-site water, White Oak Creek.

6.2 Streams

Eight (8) streams, totaling 6,718 lf, were observed on site during the site reconnaissance. Terracon considers Streams 1, 2, 3, 4, and 7 jurisdictional based on their significant nexus and connection as tributaries to the off-site stream, White Oak Creek. Terracon considers Streams 5,

New Market Solar II Site Buford, Ohio August 5, 2020 Terracon Project: N1207316



6, and 8 non-jurisdictional based on their status as ephemeral. This decision is based on 33 CFR 328.3(b)(3), which states that ephemeral features include ephemeral streams, swales, gullies, rills, and pools.

6.3 Other Waters

Four (4) ponds, totaling 1.33 acres, were observed on site during the site reconnaissance. Terracon considers Pond 4 jurisdictional based on its significant nexus to Stream 2 (Bell's Run). Ponds 1, 2, and 3 do not appear to have significant nexus to on or off-site streams; therefor, Terracon considers these ponds non-jurisdictional.

7.0 RECOMMENDATIONS

According to our preliminary site investigation, potential jurisdictional waters are present on the project site. However, for all on-site areas, only the USACE can make the final determination on the jurisdictional status of waterbodies, and on the need for permit processing and compensatory mitigation. In addition, it should be noted that the State of Ohio has an isolated wetlands program, which includes isolated ponds, and any impacts to on-site waters may have to be processed through the OEPA's 401 program.

Again, Terracon recommends a copy of this report be submitted to the USACE for their final determination of the findings of this delineation on the site. The USACE can be reached at the following address:

US Army Corps of Engineers – Huntington District ATTN: Regulatory Branch 502 Eighth Street Huntington, WV 25701-2070

8.0 GENERAL COMMENTS

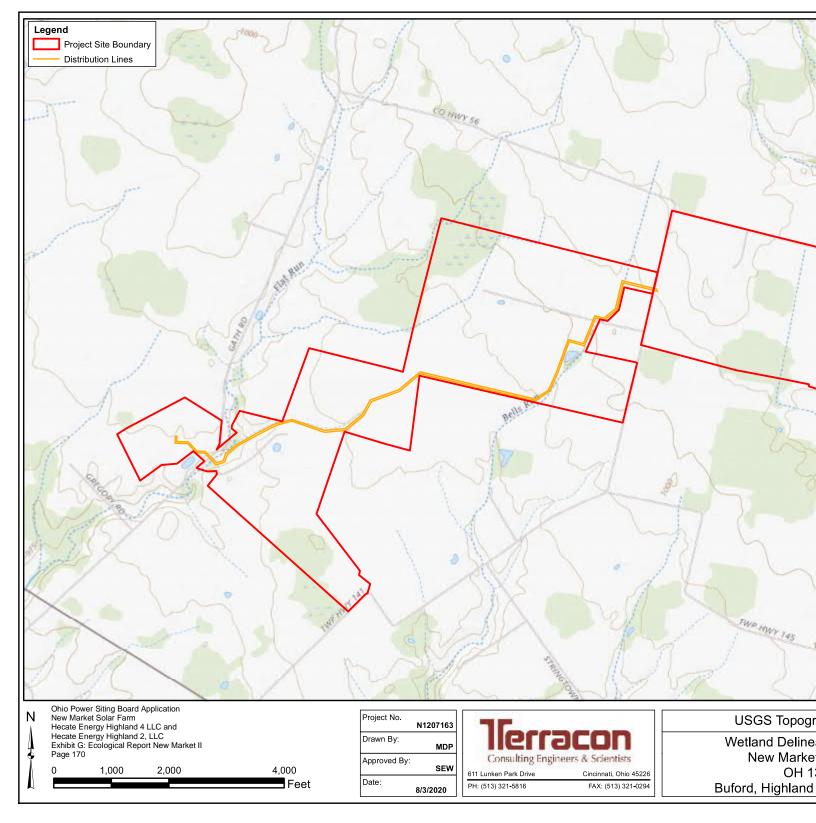
The wetland delineation was performed in accordance with generally accepted practices of this profession undertaken in similar studies at the same time and in the same geographical area. A wetland delineation, such as the one performed at this site, is of limited scope, is noninvasive, and cannot eliminate the potential that wetlands or waterbodies are present at the site beyond what is identified by the limited scope of this preliminary assessment. In conducting the limited scope of services described herein, certain sources of information and public records were not reviewed. No biological assessment can wholly eliminate uncertainty regarding the potential for concerns in connection with a project. The limitations of this preliminary assessment should be recognized.

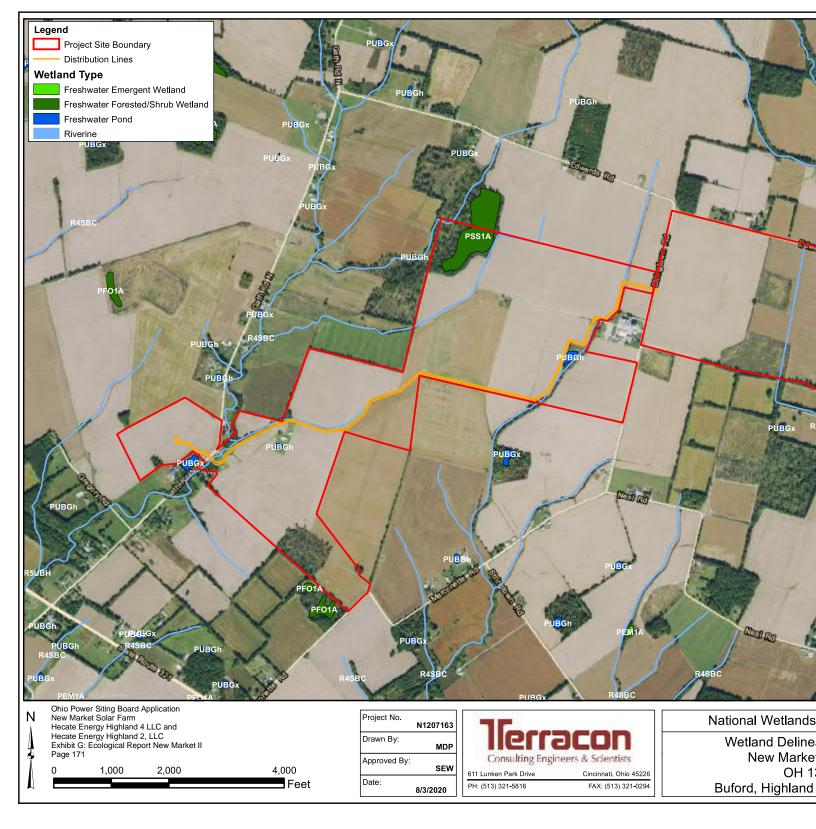
New Market Solar II Site Buford, Ohio August 5, 2020 Terracon Project: N1207316

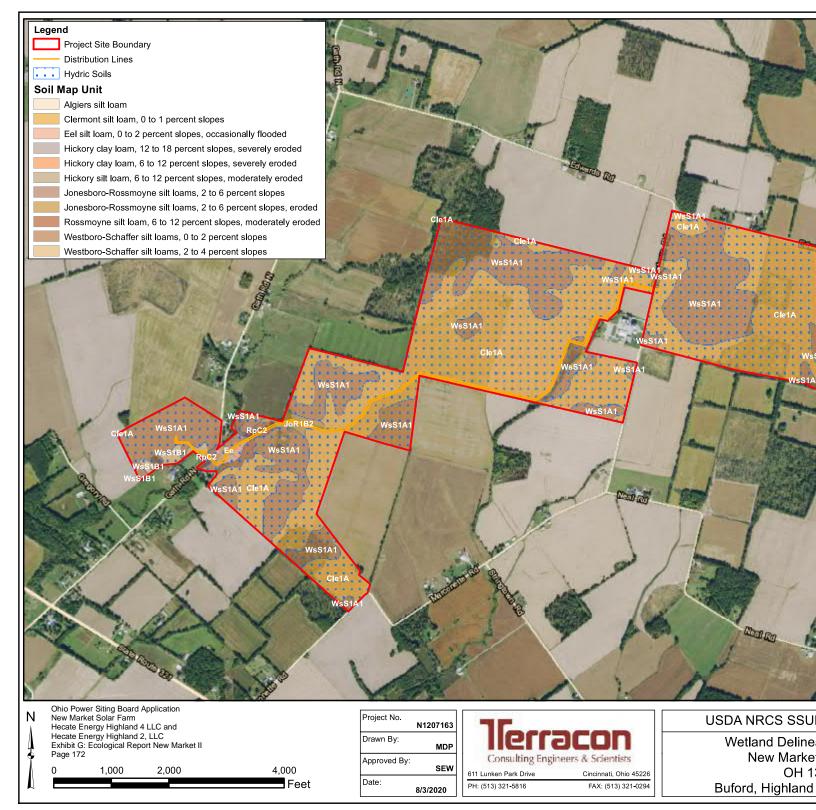


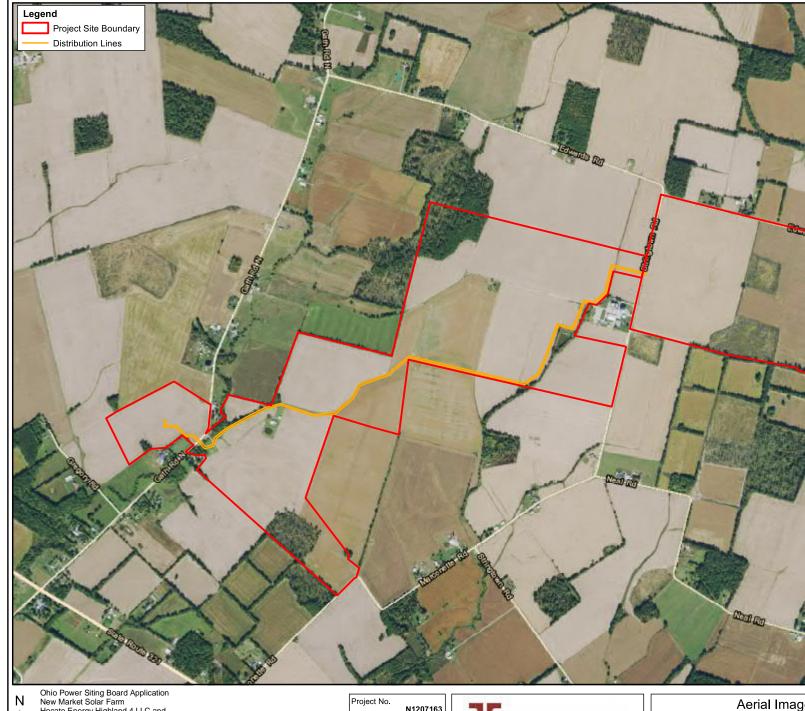
This report has been prepared in accordance with generally accepted scientific and engineering evaluation practices. This report is for the exclusive use of the client for the project being discussed. No warranties, either expressed or implied, are intended or made.

APPENDIX A – EXHIBITS









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1,000 2,000 4,000 Feet
 Project No.
 N1207163

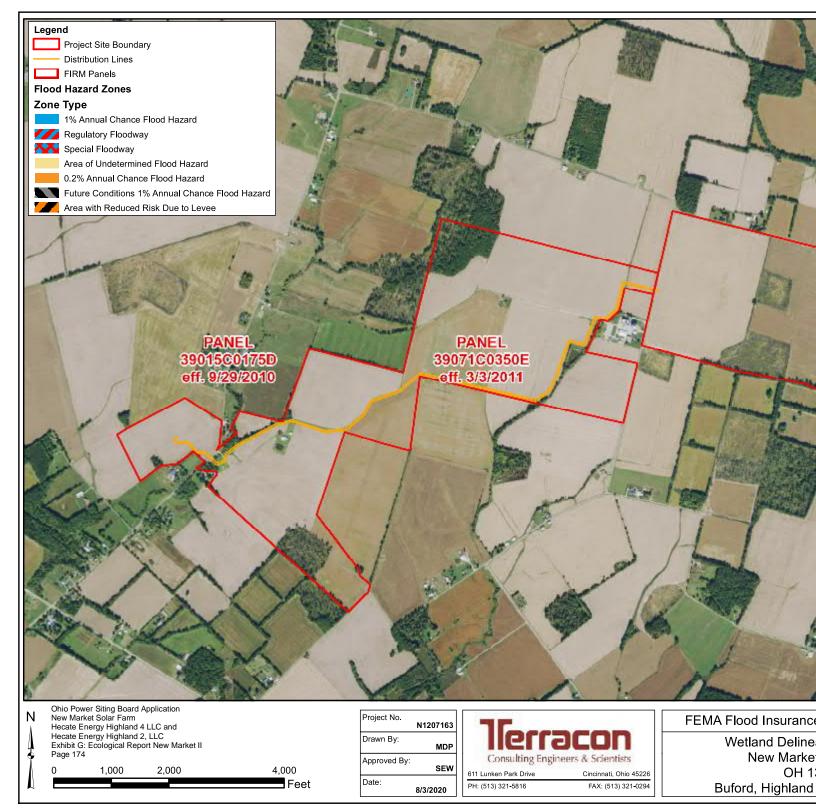
 Drawn By:
 MDP

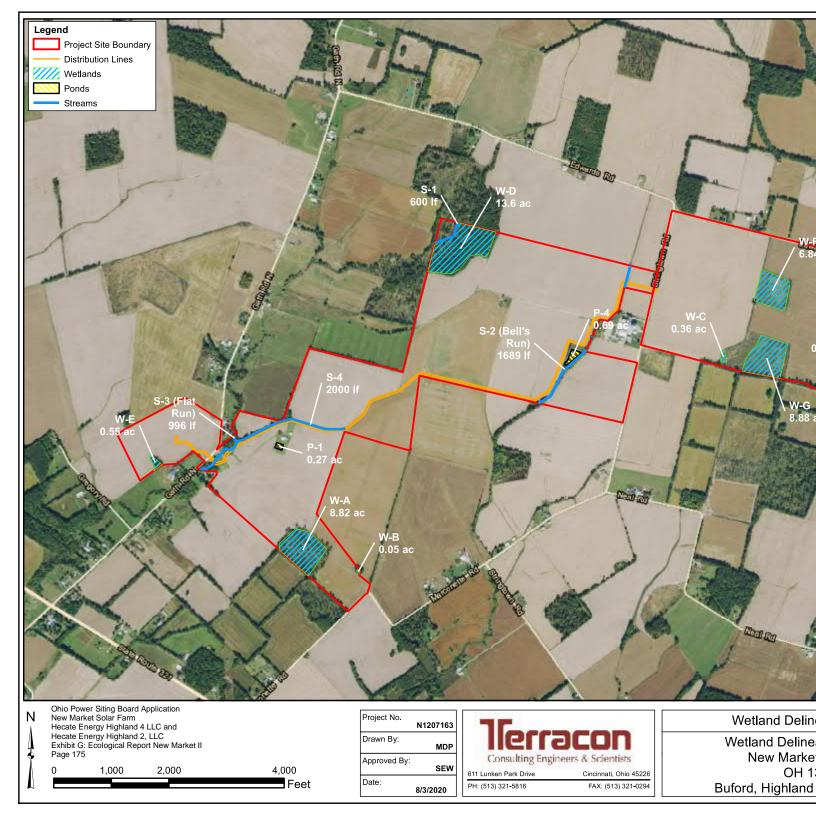
 Approved By:
 SEW

 Date:
 8/3/2020

Consulting Engineers & Scientists
611 Lunken Park Drive Cincinnati, Ohio 45226
PH: (513) 321-5816 FAX: (513) 321-0294

Wetland Deline New Marke OH 1 Buford, Highland





APPENDIX B – GROUND PHOTOGRAPHS



Photographic Documentation

Client: Hecate Energy Highland 3 LLC Project Number: N1207163

Location: Highland County, Ohio **Photographer**: C. Brendel, M. Perkins

Photograph No. 1

Date: January 2018

Direction: North

Description:

General view of agricultural

land on site.



Photograph No. 2

Date: December 2017

Direction: South

Description: Bell's Run





Photographic Documentation

Client: Hecate Energy Highland 3 LLC Project Number: N1207163

Location: Highland County, Ohio **Photographer**: C. Brendel, M. Perkins

Photograph No. 3

Date: December 2017

Direction: Northeast

Description:

General view of a typical ephemeral stream on site.



Photograph No. 4

Date: December 2017

Direction: Northwest

Description:

Flat Run





Photographic Documentation

Client: Hecate Energy LLC Project Number: N1177433

Location: Highland County, Ohio **Photographer**: M. Perkins, S. West

Photograph No. 5

Date: December 2017

Direction: West

Description:General view of a forested wetland found on site.



Photograph No. 6

Date: December 2017

Direction: Northeast

Description: Stream 1



APPENDIX C – DATA SHEETS

Project/Site: Highland Solar		City/Cour	nty: <u>Buford/H</u>	ighland	Sampl	ing Date:	07/11	/2018		
Applicant/Owner: Hecate Energy LLC			State: OH	<u>I</u> Sampl	ing Point:	U	IP			
Investigator(s): M. Perkins, C. Brendel	Section, To	ownship, Ran	ge:							
Landform (hillside, terrace, etc.):		L	ocal relief (co	oncave, convex, no	one):					
Slope (%): Lat:										
Soil Map Unit Name:					assification: I					
Are climatic / hydrologic conditions on the site typical for	this time of ye	ear? `	Yes X		_					
Are Vegetation, Soil, or Hydrologysi							D			
Are Vegetation, Soil, or Hydrologyna				lain any answers i	_		<u> </u>	•		
SUMMARY OF FINDINGS – Attach site ma				•		rtant fea	itures	, etc.		
Hydrophytic Vegetation Present? Yes No	X	Is the	Sampled Are	•a						
Hydric Soil Present? Yes X No		within a Wetland? Yes No _X								
	X			_						
Remarks:										
Observations also typical to WBUp1:										
CONTACTOR II CE CONTACTOR										
VEGETATION – Use scientific names of plan		Cominant	Indicator							
<u>Tree Stratum</u> (Plot size:)		Dominant Species?	Status	Dominance Test	worksheet:					
1. Sassafras albidum	20	Yes	FACU	Number of Domir		That				
2. Liriodendron tulipifera	20	Yes	FACU	Are OBL, FACW,	•		1	(A)		
3. Quercus alba	15	No	FACU	Total Number of	Dominant Spe	ecies				
4. Fagus grandifolia	30	Yes	FACU	Across All Strata:	:		6	(B)		
5		 .		Percent of Domin	•					
(Distaine)	85 =To	otal Cover		Are OBL, FACW,	or FAC:	16	5.7%	(A/B)		
Sapling/Shrub Stratum (Plot size:)	20	Voo	EAC	Prevalence Inde	- workshoot	-				
1. <u>Asimina triloba</u>	30	Yes	TAC	Total % Cov		: Multiply	, hv.			
2. 3.				OBL species		κ 1 =		-		
4.				FACW species		x 2 =	0	•		
5.				FAC species	_		90	•		
	30 =To	otal Cover		FACU species	105	x 4 =	420			
Herb Stratum (Plot size:)				UPL species	30	x 5 =	150			
1. Rosa rubiginosa	30	Yes	UPL	Column Totals:	165 (A))	660	(B)		
2. Podophyllum peltatum	20	Yes	FACU	Prevalence Inc	dex = B/A =	4.00)			
3		·	 							
4		 .	 [Hydrophytic Veg	-					
5				1 - Rapid Tes			ation			
6 7.			 [2 - Dominano	ce Test is >50 ce Index is ≤3					
7. 8.				4 - Morpholo			ride sup	nortina		
9.		 -			marks or on a			, , , , , , , , ,		
10.				Problematic I	Hydrophytic V	egetation ¹	¹ (Expla	iin)		
	50 =To	otal Cover		¹ Indicators of hyd		_		-		
Woody Vine Stratum (Plot size:)				be present, unles						
1				Hydrophytic						
2		,		Vegetation						
	=To	otal Cover		Present?	Yes	No X	_			
Remarks: (Include photo numbers here or on a separa	ite sheet.)									

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SOIL Sampling Point: UP Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.) Redox Features Loc² Color (moist) % Type¹ (inches) Color (moist) Texture Remarks 1-5 10YR 4/3 100 Loamy/Clayey 7.5YR 5/1 60 7.5YR 5/8 40 С 5-13 Loamy/Clayey Prominent redox concentrations Μ ²Location: PL=Pore Lining, M=Matrix. ¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. **Hydric Soil Indicators:** Indicators for Problematic Hydric Soils³: Histosol (A1) Sandy Gleyed Matrix (S4) Coast Prairie Redox (A16) Histic Epipedon (A2) Sandy Redox (S5) Iron-Manganese Masses (F12) Black Histic (A3) Stripped Matrix (S6) Red Parent Material (F21) Hydrogen Sulfide (A4) Dark Surface (S7) Very Shallow Dark Surface (F22) Stratified Layers (A5) Loamy Mucky Mineral (F1) Other (Explain in Remarks) 2 cm Muck (A10) Loamy Gleyed Matrix (F2) Depleted Below Dark Surface (A11) X Depleted Matrix (F3) Thick Dark Surface (A12) Redox Dark Surface (F6) ³Indicators of hydrophytic vegetation and Sandy Mucky Mineral (S1) Depleted Dark Surface (F7) wetland hydrology must be present,

Redox Depressions (F8)

Errata. (http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_051293.docx)

HYDROLOGY

Type:

Remarks:

Depth (inches):

5 cm Mucky Peat or Peat (S3)

Restrictive Layer (if observed):

Wetland Hydrology Indicators: Primary Indicators (minimum of one is required; check all that apply) Secondary Indicators (minimum of two required) Surface Water (A1) Water-Stained Leaves (B9) Surface Soil Cracks (B6) High Water Table (A2) Aquatic Fauna (B13) Drainage Patterns (B10) Saturation (A3) True Aquatic Plants (B14) Dry-Season Water Table (C2) Water Marks (B1) Hydrogen Sulfide Odor (C1) Crayfish Burrows (C8) Sediment Deposits (B2) Oxidized Rhizospheres on Living Roots (C3) Saturation Visible on Aerial Imagery (C9) Stunted or Stressed Plants (D1) Drift Deposits (B3) Presence of Reduced Iron (C4) Algal Mat or Crust (B4) Recent Iron Reduction in Tilled Soils (C6) Geomorphic Position (D2) Iron Deposits (B5) Thin Muck Surface (C7) FAC-Neutral Test (D5) Inundation Visible on Aerial Imagery (B7) Gauge or Well Data (D9) Sparsely Vegetated Concave Surface (B8) Other (Explain in Remarks) Field Observations: Surface Water Present? Depth (inches): Yes Water Table Present? Depth (inches): Saturation Present? Depth (inches): Wetland Hydrology Present? No Х (includes capillary fringe) Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available: Remarks:

This data form is revised from Midwest Regional Supplement Version 2.0 to include the NRCS Field Indicators of Hydric Soils, Version 7.0, 2015

unless disturbed or problematic.

No

Hydric Soil Present?

Project/Site: Highland Solar	City/Cou	City/County: Buford/Highland Sampling Date:									
Applicant/Owner: Hecate Energy LLC	<u> </u>		State: <u>OH</u>	Sampling Point:	WF/A						
Investigator(s): M. Perkins, C. Brendel	Section, 7	Гownship, Ra	ange:								
Landform (hillside, terrace, etc.):			Local relief (d	concave, convex, none):_							
Slope (%): Lat: 39.075526		Long:	83.763171		Datum: NAD83						
Soil Map Unit Name: Clermont silt loam, 0 to 1 percent	slopes			NWI classifi	cation:						
Are climatic / hydrologic conditions on the site typical for	or this time of	f year?	Yes X	No (If no, expl	lain in Remarks.)						
Are Vegetation, Soil, or Hydrologys	significantly d	disturbed? /	Are "Normal (Circumstances" present?	Yes X No						
Are Vegetation , Soil , or Hydrology											
SUMMARY OF FINDINGS – Attach site ma						es, etc.					
Hydrophytic Vegetation Present? Yes X No	o	Is the	Sampled A	rea							
			within a Wetland? Yes X No No								
Remarks:											
VEGETATION – Use scientific names of pla											
<u>Tree Stratum</u> (Plot size:)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worl	ksheet:						
1. Quercus palustris	40	Yes	FACW	Number of Dominant S							
2. Acer rubrum	20	Yes	FAC	Are OBL, FACW, or FA	•	(A)					
3. Ulmus rubra	20	Yes	FAC	Total Number of Domi		, .					
4.				Across All Strata:	6	(B)					
5.				Percent of Dominant S	Species That						
	80=	=Total Cover		Are OBL, FACW, or FA	AC: 83.3%	(A/B)					
Sapling/Shrub Stratum (Plot size:			= . = ,								
1. Lindera benzoin	40	Yes	FACU	Prevalence Index wo							
2. <u>Fagus grandifolia</u>	10	Yes	FACU	Total % Cover of:							
3 4.				OBL species 40 FACW species 80							
5.				FAC species 40							
o	50 =	=Total Cover		FACU species 10							
Herb Stratum (Plot size:)				UPL species 0							
1. Carex lurida	40	Yes	OBL	Column Totals: 170	O (A) 360	(B)					
2.				Prevalence Index =	B/A = 2.12						
3.											
4				Hydrophytic Vegetati							
5					Hydrophytic Vegetation	n					
6.				X 2 - Dominance Te							
7				X 3 - Prevalence Ind	lex is ≤3.0° Adaptations¹ (Provide :						
8 9.				<u> </u>	s or on a separate she						
10.					phytic Vegetation ¹ (Ex						
10	40 =	=Total Cover		l 							
Woody Vine Stratum (Plot size:				Indicators of hydric so be present, unless dist		gy musi					
1.					· ·						
2.				Hydrophytic Vegetation							
		Present? Yes X No									
Remarks: (Include photo numbers here or on a separ	rate sheet.)				-						
•											
Ohio Davisa Oitian David Analisatian											

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SOIL Sampling Point: WF/A

Profile Des	cription: (Describe	to the depti	h needed to doc	ument t	he indica	ator or o	confirm the absence	of indicators.)			
Depth	Matrix			x Featur							
(inches)	Color (moist)	%	Color (moist)	<u>%</u>	Type ¹	Loc ²	Texture	Remarks			
1-4	10YR 4/3	100					Loamy/Clayey				
4-12	7.5YR 5/1	60	7.5YR 5/8	_40_	C	M_	Loamy/Clayey	Prominent redox concentrations			
-											
								-			
-											
-											
¹ Type: C=C	Concentration, D=De	pletion, RM=F	Reduced Matrix, N	/IS=Mas	ked Sand	d Grains	. ² Location	n: PL=Pore Lining, M=Matrix.			
Hydric Soil	Indicators:						Indicato	rs for Problematic Hydric Soils ³ :			
Histoso	Histosol (A1) Sandy Gleyed Matrix (S4)					Coast Prairie Redox (A16)					
Histic E	pipedon (A2)		Sandy Red	dox (S5)			Iron-Manganese Masses (F12)				
Black H	listic (A3)		Stripped M	latrix (S6	5)		Red Parent Material (F21)				
Hydroge	en Sulfide (A4)		Dark Surfa	ice (S7)			Very Shallow Dark Surface (F22)				
Stratifie	d Layers (A5)		Loamy Mu	cky Mine	eral (F1)		Othe	r (Explain in Remarks)			
2 cm M	uck (A10)		Loamy Gle	eyed Ma	trix (F2)						
Deplete	d Below Dark Surfac	ce (A11)	X Depleted N	∕latrix (F	3)						
Thick D	ark Surface (A12)		Redox Dar		` '		³ Indicato	rs of hydrophytic vegetation and			
	Mucky Mineral (S1)		Depleted D					and hydrology must be present,			
5 cm M	ucky Peat or Peat (S	33)	Redox Dep	oression	s (F8)		unles	ss disturbed or problematic.			
Restrictive	Layer (if observed):									
Type:			<u></u>								
Depth (i	inches):		<u> </u>				Hydric Soil Present	t? Yes <u>X</u> No			
Remarks:											
This data fo	orm is revised from N	lidwest Regio	nal Supplement \	ersion 2	2.0 to inc	lude the	NRCS Field Indicator	s of Hydric Soils, Version 7.0, 2015			
Errata. (http	o://www.nrcs.usda.go	ov/Internet/FS	E_DOCUMENTS	/nrcs142	2p2_0512	293.doc	k)				
HYDROL	OGY										
Wetland Hy	ydrology Indicators	:									
Primary Ind	icators (minimum of	one is require	ed; check all that	apply)			<u>Seconda</u>	ry Indicators (minimum of two required			
Surface	Water (A1)		X Water-Stai	ined Lea	ives (B9)		Surfa	ace Soil Cracks (B6)			
	ater Table (A2)		Aquatic Fa	ıuna (B1	3)			nage Patterns (B10)			
Saturati	ion (A3)		True Aqua		, ,		Dry-	Season Water Table (C2)			
Water N	Marks (B1)		Hydrogen	Sulfide (Odor (C1))	X Cray	fish Burrows (C8)			
	nt Deposits (B2)		Oxidized R			-		ration Visible on Aerial Imagery (C9)			
	posits (B3)		Presence					ted or Stressed Plants (D1)			
l —	at or Crust (B4)		Recent Iro			lled Soil		morphic Position (D2)			
l 	posits (B5)		Thin Muck		, ,		FAC	-Neutral Test (D5)			
	ion Visible on Aerial	0, ,									
Sparsel	y Vegetated Concav	e Surface (B	B) Other (Exp	lain in F	Remarks)		_				
Field Obse	rvations:										
		es			nches):_						
Water Table		es			nches):						
Saturation Present? Yes No X Depth (inches): Wetland Hydrology Present? Yes X No											
	apillary fringe)						1				
Describe Re	ecorded Data (strear	n gauge, mor	nitoring well, aeria	l photos	, previous	s inspec	tions), if available:				
Remarks:											
r tomanto.											
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Project/Site: Highland Solar	City/Cou	City/County: Buford/Highland Sampling Date: 12/14									
Applicant/Owner: Hecate Energy LLC				State: <u>OF</u>							
Investigator(s): M. Perkins, C. Brendel	Section,	_ Гownship, Ra	ange:								
Landform (hillside, terrace, etc.):			Local relief (d	concave, convex, no	one):						
Slope (%): Lat: 39.075493											
Soil Map Unit Name: Clermont silt loam, 0 to 1 perc	ent slopes			NWI c	classification:						
Are climatic / hydrologic conditions on the site typical	al for this time of	year?	Yes X	No (If no	o, explain in Remarks	.)	_				
Are Vegetation, Soil, or Hydrology	significantly d	isturbed? /	Are "Normal (Circumstances" pre	sent? Yes X	No					
Are Vegetation, Soil, or Hydrology	naturally prob	lematic? ((If needed, ex	xplain any answers i	in Remarks.)						
SUMMARY OF FINDINGS – Attach site	map showin	g samplir	ng point lo	ocations, transc	ects, important f	eatures, e	etc.				
Hydrophytic Vegetation Present? Yes	No_X	Is the	e Sampled A	rea							
Hydric Soil Present? Yes X	No		within a Wetland? Yes No X								
	No X										
Remarks:											
VECETATION Lieu estantific nomes of a	1										
VEGETATION – Use scientific names of p	Absolute	Dominant	Indicator	T							
Tree Stratum (Plot size:)		Species?	Status	Dominance Tes	st worksheet:						
1. Carya ovata	60	Yes	FACU	Number of Domi	inant Species That						
2. Acer rubrum	20	Yes	FAC	Are OBL, FACW	, or FAC:	(A	١)				
3.					Dominant Species	- (F	-,				
4.				Across All Strata	_	5(B	3)				
5	80 =	Total Cover		Percent of Domir Are OBL, FACW	nant Species That /. or FAC:	40.0% (A	4/B)				
Sapling/Shrub Stratum (Plot size:		Total Cove.		Alo OBE, TAOL		<u> 40.070</u> ₍ .	(, D,				
1. Fagus grandifolia	30	Yes	FACU	Prevalence Inde	ex worksheet:						
2.				Total % Cov	ver of: Multi	iply by:					
3				OBL species _							
4				FACW species_							
5	30 =	Total Cover		FAC species FACU species	40 x 3 = 140 x 4 =	120 560					
Herb Stratum (Plot size:)		Total Cover		UPL species	0 x 4 =	0					
1. Rosa multiflora	50	Yes	FACU	Column Totals:		680 (B	3)				
2. Toxicodendron radicans	20	Yes	FAC	Prevalence In		3.78	,				
3.											
4				' ' '	getation Indicators:						
5.					est for Hydrophytic Ve	getation					
6.					nce Test is >50% nce Index is ≤3.0 ¹						
7. 8.					ice Index is ≤3.0 ogical Adaptations¹ (Pi	rovide suppo	orting				
9.					emarks or on a separa		// til5				
10.				Problematic	Hydrophytic Vegetation	on ¹ (Explain))				
	70 =	Total Cover		¹ Indicators of hyd	dric soil and wetland h	nydrology mu	ust				
Woody Vine Stratum (Plot size:)				ss disturbed or proble						
1.				Hydrophytic							
2		Total Cover		Vegetation	V-a No	V					
		=Total Cover		Present?	Yes No	<u>*</u>					
Remarks: (Include photo numbers here or on a se	parate sheet.)										
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SOIL Sampling Point: Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.) Redox Features Loc² Color (moist) % Color (moist) Type¹ (inches) Texture Remarks 10YR 4/3 1-4 100 Loamy/Clayey 4-12 7.5YR 5/1 60 7.5YR 5/8 40 С Loamy/Clayey Prominent redox concentrations Μ ²Location: PL=Pore Lining, M=Matrix. ¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. **Hydric Soil Indicators:** Indicators for Problematic Hydric Soils3: Histosol (A1) Sandy Gleyed Matrix (S4) Coast Prairie Redox (A16) Histic Epipedon (A2) Sandy Redox (S5) Iron-Manganese Masses (F12) Black Histic (A3) Stripped Matrix (S6) Red Parent Material (F21) Hydrogen Sulfide (A4) Dark Surface (S7) Very Shallow Dark Surface (F22) Stratified Layers (A5) Loamy Mucky Mineral (F1) Other (Explain in Remarks) 2 cm Muck (A10) Loamy Gleyed Matrix (F2) Depleted Below Dark Surface (A11) X Depleted Matrix (F3) Thick Dark Surface (A12) Redox Dark Surface (F6) ³Indicators of hydrophytic vegetation and Sandy Mucky Mineral (S1) Depleted Dark Surface (F7) wetland hydrology must be present, 5 cm Mucky Peat or Peat (S3) Redox Depressions (F8) unless disturbed or problematic. Restrictive Layer (if observed): Type: Depth (inches): **Hydric Soil Present?** No Remarks: This data form is revised from Midwest Regional Supplement Version 2.0 to include the NRCS Field Indicators of Hydric Soils, Version 7.0, 2015 Errata. (http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_051293.docx) **HYDROLOGY** Wetland Hydrology Indicators: Primary Indicators (minimum of one is required; check all that apply) Secondary Indicators (minimum of two required) Surface Water (A1) Water-Stained Leaves (B9) Surface Soil Cracks (B6) High Water Table (A2) Aquatic Fauna (B13) Drainage Patterns (B10) Saturation (A3) True Aquatic Plants (B14) Dry-Season Water Table (C2) Water Marks (B1) Hydrogen Sulfide Odor (C1) Crayfish Burrows (C8) Sediment Deposits (B2) Oxidized Rhizospheres on Living Roots (C3) Saturation Visible on Aerial Imagery (C9) Stunted or Stressed Plants (D1) Drift Deposits (B3) Presence of Reduced Iron (C4) Algal Mat or Crust (B4) Recent Iron Reduction in Tilled Soils (C6) Geomorphic Position (D2) Iron Deposits (B5) Thin Muck Surface (C7) FAC-Neutral Test (D5) Inundation Visible on Aerial Imagery (B7) Gauge or Well Data (D9) Sparsely Vegetated Concave Surface (B8) Other (Explain in Remarks) Field Observations: Surface Water Present? Depth (inches): Yes Water Table Present? Depth (inches): Saturation Present? Depth (inches): Wetland Hydrology Present? No Х (includes capillary fringe)

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

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Remarks:

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Project/Site: Highland Solar	City/Cou	City/County: Buford/Highland Sampling Date: 12/									
Applicant/Owner: Hecate Energy LLC				State: <u>OH</u>	Sampling Point:	WG/H					
Investigator(s): M. Perkins, C. Brendel		Section,	Township, Ra	ange:							
Landform (hillside, terrace, etc.):			Local relief (d	concave, convex, none):_							
Slope (%): Lat: 39.079645		Long:	-83.780417		Datum: NAD83						
Soil Map Unit Name: Westboro-Schaffer silt loams, 0 t	o 2 percent s	lopes		NWI classific	cation: PSS1A						
Are climatic / hydrologic conditions on the site typical for	or this time o	f year?	Yes_X	No (If no, expl	ain in Remarks.)						
Are Vegetation, Soil, or Hydrology	significantly o	listurbed?	Are "Normal (Circumstances" present?	Yes_X_ No_						
Are Vegetation , Soil , or Hydrology					<u> </u>						
SUMMARY OF FINDINGS – Attach site ma	ap showin	ıg sampliı	ng point lo	ocations, transects,	important featur	es, etc.					
Hydrophytic Vegetation Present? Yes X No	o	Is the	e Sampled A	rea							
		withi	within a Wetland? Yes X No No								
Wetland Hydrology Present? Yes X No	<u> </u>										
Remarks:	22 770040										
Observations consistent with WGWet2: 39.082588, -8	03.770040										
VEGETATION – Use scientific names of pla	ınts.										
·	Absolute	Dominant	Indicator								
Tree Stratum (Plot size:)	% Cover	Species?	Status	Dominance Test work	sheet:						
Quercus palustris Acer rubrum	30	Yes Yes	FACW FAC	Number of Dominant S	•	(4)					
Acer rubrum Liquidambar styraciflua	30	Yes	FACW	Are OBL, FACW, or FA		(A)					
4.		103	TAOW	Total Number of Domir Across All Strata:	nant Species 6	(B)					
5.				Percent of Dominant S		``					
	90 =	Total Cover		Are OBL, FACW, or FA	•	6 (A/B)					
Sapling/Shrub Stratum (Plot size:)										
1. Lindera benzoin	40	Yes	FACW	Prevalence Index wor	rksheet:						
2. Fagus grandifolia	30	Yes	FACU	Total % Cover of:		<u> </u>					
3.				OBL species 70							
4 5.				FACW species 100 FAC species 30							
J	70 =	Total Cover		FACU species 30							
Herb Stratum (Plot size:)		- rotal Govol		UPL species 0							
1. Carex lurida	70	Yes	OBL	Column Totals: 230	(A) 480	(B)					
2.				Prevalence Index =	B/A = 2.09						
3.											
4				Hydrophytic Vegetation							
5					Hydrophytic Vegetatio	n					
6.				X 2 - Dominance Tes							
7				X 3 - Prevalence Ind	ex is ≤3.0° Adaptations¹ (Provide	aupporting					
8 9.				·	s or on a separate she						
10.					phytic Vegetation ¹ (Ex						
	70 =	Total Cover		¹ Indicators of hydric so							
Woody Vine Stratum (Plot size:)			be present, unless dist		gy musi					
1.				Hydrophytic							
2.			Hydrophytic Vegetation								
	=Total Cover										
Remarks: (Include photo numbers here or on a sepa	rate sheet.)										
Ohio Power Siting Board Application											

JOhio Power Siting Board Application New Market Solar Farm Hecate Energy Highland 4 LLC and Hecate Energy Highland 2, LLC Exhibit G: Ecological Report New Market II Page 187 SOIL Sampling Point: WG/H

Profile Des	cription: (Describe	to the depti	n needed to doc	ument t	ne indica	ator or o	confirm the absence	of indicators.)			
Depth	Matrix		Redo	x Featur							
(inches)	Color (moist)	<u>%</u>	Color (moist)	%_	Type ¹	Loc ²	Texture	Remarks			
1-4	10YR 4/3	100					Loamy/Clayey				
4-12	7.5YR 5/1	60	7.5YR 5/8	40	С	M	Loamy/Clayey	Prominent redox concentrations			
	-										
-											
-											
-											
							-				
	Concentration, D=Dep	oletion, RM=F	Reduced Matrix, N	/IS=Mas	ked Sand	d Grains	. ² Location	n: PL=Pore Lining, M=Matrix.			
Hydric Soil	Indicators:						Indicato	rs for Problematic Hydric Soils ³ :			
Histosol	I (A1)		Sandy Gle		rix (S4)		Coast Prairie Redox (A16)				
Histic E	pipedon (A2)		Sandy Red				Iron-	Manganese Masses (F12)			
-	listic (A3)		Stripped M	latrix (S6	5)		Red	Parent Material (F21)			
Hydroge	en Sulfide (A4)		Dark Surfa	ice (S7)			Very	Shallow Dark Surface (F22)			
	d Layers (A5)		Loamy Mu				Othe	er (Explain in Remarks)			
	uck (A10)		Loamy Gle	-							
	d Below Dark Surfac	e (A11)	X Depleted N	`	,		0				
	ark Surface (A12)		Redox Dar		` '			rs of hydrophytic vegetation and			
				and hydrology must be present,							
5 cm Mi	ucky Peat or Peat (S	3)	Redox Dep	oression	s (F8)	1	unle	ss disturbed or problematic.			
Restrictive	Layer (if observed)	:									
Type:			_								
Depth (i	inches):		_				Hydric Soil Presen	t? Yes X No			
Remarks:	orm is revised from M	lidwest Regio	ınal Sunnlement \	/ersion 1	2 0 to inc	luda tha	NRCS Field Indicator	rs of Hydric Soils, Version 7.0, 2015			
	o://www.nrcs.usda.go							is of Flydric Solis, Version 7.0, 2013			
	· ·		_		. –		•				
HYDROLO	OGY										
Wetland Hy	ydrology Indicators	:									
_	icators (minimum of		ed: check all that a	apply)			Seconda	ary Indicators (minimum of two required)			
	· Water (A1)	<u> </u>	X Water-Stai		ves (B9)		<u> </u>	ace Soil Cracks (B6)			
	ater Table (A2)		Aquatic Fa		, ,			nage Patterns (B10)			
Saturati			True Aqua	•	•		·	Season Water Table (C2)			
Water N	Marks (B1)		Hydrogen)		rfish Burrows (C8)			
Sedime	nt Deposits (B2)		Oxidized R	Rhizosph	eres on l	_iving R	oots (C3) Satu	ration Visible on Aerial Imagery (C9)			
Drift De	posits (B3)		Presence	of Reduc	ced Iron ((C4)	Stun	ited or Stressed Plants (D1)			
Algal Ma	at or Crust (B4)		Recent Iro	n Reduc	tion in Ti	lled Soil	s (C6) George	morphic Position (D2)			
Iron Dep	posits (B5)		Thin Muck	Surface	(C7)		FAC	-Neutral Test (D5)			
Inundati	ion Visible on Aerial	Imagery (B7)	Gauge or \	Well Dat	a (D9)						
Sparsel	y Vegetated Concav	e Surface (B8	3) Other (Exp	olain in F	Remarks)						
Field Obse	rvations:										
Surface Wa	iter Present? Y	es	No <u>X</u>	Depth (i	nches):						
Water Table	e Present? Y	es		Depth (i	nches):						
Saturation F	Present? Y	es	No X	Depth (i	nches):_		Wetland Hydrolo	gy Present? Yes X No			
	apillary fringe)										
Describe Re	ecorded Data (strean	n gauge, mor	nitoring well, aeria	l photos	, previou	s inspec	ctions), if available:				
Domester											
Remarks:											
Note: Power Siting	Board Application										

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APPENDIX D



This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 20-1288-EL-BGN

Summary: Exhibit Application Exhibit G (Part 2) electronically filed by Ms. Karen A. Winters on behalf of Hecate Energy Highland 4 LLC