

Flint Grid Energy Storage System

Exhibit N

Habitat Assessment

Case No. 21-1061-EL-BGN

Habitat Assessment

Flint Grid Energy Storage System

Jersey Township, Licking County, Ohio

Prepared for:

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1 INTRODUCTION

On behalf of Flint Grid LLC (Flint Grid), EDR completed a reconnaissance-level habitat assessment of the approximately 15-acre Flint Grid Energy Storage System (Project) in Jersey Township, Licking County, Ohio (Project Area; Appendix A, Figure 1). The information and recommendations included in this report are intended to satisfy the requirements of 4906-04-08(B)(1) of the Ohio Administrative Code (OAC) and to assist the Ohio Power Siting Board (OPSB) with its review of the Project.

2 PROJECT AREA DESCRIPTION

The Project Area consists primarily of wooded land and includes one residence, two dilapidated structures, four wetlands, and one pond system. The Project Area is bound by Jug Street and agricultural land to the north, an electrical power substation and a pond to the west and southwest, a warehouse to the south, and an industrial park to the east (Appendix C Photos 8, 9, and 13). The surrounding area consists of a mix of agricultural land with sporadic woodlots, warehouses, and rural residences. This area has experienced significant industrial development in recent years, and the available, recent aerial imagery no longer reflects the current state of the Project Area surroundings.

3 DESKTOP ANALYSIS

EDR performed a desktop analysis to review existing Project Area conditions. The review included information from the following resources: National Land Cover Database (NLCD) data (MRLC, 2019), Ohio Department of Natural Resources (ODNR) Division of Wildlife (DOW) wildlife area maps (ODNR, n.d.), U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) wetland mapping (USFWS, 2021), U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey (USDA NRCS, 2021), and aerial photographs. As required by OAC 4906-04-08(B)(1)(a), ecological resources within 0.5 mile of the Project Area are shown in Appendix A.

3.1 Land Cover

Approximately 66.7% of land cover within the Project Area is deciduous forest (Appendix A, Figure 2 and Table 1). Land cover was initially determined using NLCD categories and aerial photographs, and subsequently verified and/or modified using observations from the field reconnaissance and previously delineated features. NLCD Land cover types within the Project Area consist of the following:

- **Deciduous Forest** - 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 in this land cover type shed foliage simultaneously in response to seasonal change.
- **Woody Wetland** - 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.
- **Emergent Herbaceous Wetland** - Areas where perennial herbaceous vegetation accounts for greater than 80% of vegetative cover and the soil or substrate is periodically saturated with or covered with water.

- **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.
- **Grassland/Herbaceous** - Areas dominated by graminoid or herbaceous vegetation, generally greater than 80% of total vegetation. These areas are not subject to intensive management such as tilling but can be utilized for grazing.
- **Open Water** - Areas of open water, generally with less than 25% cover of vegetation or soil.

Table 1. Land Cover Types within the Project Area

Land Cover Type	Area within Project Area (acres)	Area within Project Area (%)
Deciduous Forest	9.93	66.7
Woody Wetland	2.31	15.5
Emergent Herbaceous Wetland	0.31	2.1
Developed, Medium Intensity	0.74	5.0
Grassland/Herbaceous	0.97	6.5
Open Water	0.64	4.3

3.2 Wildlife Areas, Nature Preserves, and other Conservation Areas

According to the ODNR DOW, the Dillon Wildlife Area is the only wildlife area within Licking County, approximately 30 miles east of the Project Area. Additionally, there are two nature preserves, Gahanna Woods and Morris Woods, located 7.4 miles south and 7.4 miles north of the Project Area, respectively (ODNR, n.d.). According to the various sources reviewed in support of this report, no other wildlife areas, nature preserves, or conservation areas are present within 0.5 mile of the Project Area.

3.3 National Wetlands Inventory

One NWI-mapped pond (NWI Code PUBGx) is within the Project Area. No NWI wetlands or streams are mapped within the Project Area. NWI-mapped wetlands within 0.5 mile of the Project Area are provided in Appendix A, Figure 2.

3.4 Highly Erodible Soils

Highly Erodible Land (HEL) is defined by the USDA NRCS as “any land that can erode at excessive rates because of its soil properties and is designated by field and based on the proportion of the total field acreage that contains highly erodible soils” (USDA NRCS, 2017). Soils are assigned an erodibility class of either Non-Highly Erodible Land (NHEL), Potential Highly Erodible Land (PHEL), or Highly Erodible Land (HEL). The erodibility class is based on the range in slope, range in slope length, K factor (susceptibility to erosion), T factor (tons of soil per acre per year that can be lost, but still maintain productivity), and R factor (rainfall factor). Soils classified as PHEL can be determined in the field to be either NHEL or HEL, depending on site-specific characteristics such as slopes. The erodibility classes of soils are compiled for each county and published on the USDA NRCS website (USDA NRCS, n.d.).

The NRCS Web Soil Survey (USDA NRCS, 2021) lists three soils within the Project Area. Bennington silt loam is classified as a PHEL soil and the remaining soils are classified as NHEL. Soils within the Project Area and their HEL classifications are provided in Table 2. Soil mapping is provided in Appendix A, Figure 3.

Table 2. Soils within the Project Area

Soil Name	Slope (%)	HEL Classification ¹	Project Area (acres)	Project Area (%)
BeA – Bennington silt loam	0 to 2	NHEL	1.9	12.7
BeB – Bennington silt loam	2 to 6	PHEL	7.8	52.3
Pe – Pewamo silty clay loam, low carbonate till	0-2	NHEL	5.2	35.0

¹NHEL = Non-Highly Erodible Land; PHEL = Potential Highly Erodible Land

3.5 Plant and Animal Life

As required by OAC 4906-04-08(1)(c), a literature review of plant and animal life within 0.25 mile of the Project Area was completed to identify aquatic and terrestrial plant and animal species that are of commercial or recreational value and species designated as endangered or threatened. Consultation with USFWS and ODNR is provided as Appendix B.

3.5.1 Federal and State Listed Species

According to the September 28, 2021, information request response from ODNR, no occurrences of rare or endangered species within the Project Area or within a 1-mile radius of the Project Area have been recorded. Additionally, the ODNR letter indicates that no unique ecological sites, geologic features, animal assemblages, scenic rivers, state nature preserves, parks, wildlife areas or forests, national wildlife refuges, or other protected natural areas are within 1 mile of the Project Area.

According to the September 28, 2021, information request response from USFWS, the federally listed Indiana bat (endangered; *Myotis sodalis*) and northern long-eared bat (threatened; *Myotis septentrionalis*) occur throughout Ohio. These species may be present wherever suitable roosting and foraging habitat exist. USFWS recommends avoiding removal of trees ≥ 3 inches diameter at breast height (dbh), wherever possible. If avoidance is not possible, USFWS recommends seasonal clearing of trees between October 1 and March 31 to avoid adverse effects to these bat species.

EDR requested a list of threatened and endangered species that may occur within the Project Area from USFWS through Information for Planning and Consultation (IPaC) on October 20, 2021. IPaC indicated the Indiana bat and northern long-eared bat as potentially could occurring within the Project Area. No critical habitats exist within the Project Area.

3.5.2 Species of Commercial or Recreational Value

The 15-acre Project Area consists primarily of deciduous forest with wetlands, a pond system, and interspersed mowed patches and trails. The Project Area contains habitat suitable for deer, fish, birds, and other game species and could potentially be used for recreation (i.e., hunting/fishing); however, given the relatively small size of the site, private ownership, and surrounding commercial/industrial land uses, it is

unlikely the site would be used for recreation by the general public. Additionally, no plants or animals with commercial or recreational value were identified during the field reconnaissance.

4 FIELD INVESTIGATION

EDR completed a reconnaissance-level habitat assessment of the Project Area on October 14, 2021, to identify potential habitat for plant and animal species within the Project Area. Prior to the site visit, wetland and stream delineations were performed by EMH&T on September 1, 2020.

4.1 Habitat Assessment

EDR biologists walked the Project Area and made visual observations of potential habitat for federally- and state-listed species. Prior to conducting the site visit, EDR reviewed aerial photographs, land cover data, and existing wetland and stream data. Land cover classifications were verified (see Section 3.1 above) and data was collected in areas that were identified as containing potential habitat for federally listed species. Potential habitat descriptions are provided in Table 3. Field verified land cover within the Project Area is shown in Appendix A, Figure 4. Representative photographs of the Project Area and potential habitat locations are provided in Appendix C.

Table 3. Potential Habitat for Listed Species within the Project Area

Species	Status ¹	Habitat Description	Habitat Presence (Y/N)
Indiana bat (<i>Myotis sodalis</i>)	F-E	Hibernates in caves and mines. Maternity and foraging habitat includes small stream corridors with well-developed riparian woods and upland forests.	Yes (maternity and foraging only)
Northern long-eared bat (<i>Myotis septentrionalis</i>)	F-T	Hibernates in caves and mines. Maternity and foraging habitat includes small stream corridors with well-developed riparian woods and upland forests.	Yes (maternity and foraging only)

¹F-E=federally listed as endangered; F-T=federally listed as threatened

The Project Area is primarily wooded land with a pond system, wetlands, and sporadically mowed grass patches and trails. The wooded land within the Project Area provides potential maternity and foraging habitat for bat species. Potential bat roost trees with exfoliating bark were identified throughout wooded areas within the Project Area (Appendix C, Photograph 1).

4.2 Wetland and Stream Delineation

EMH&T delineated four potentially isolated wetlands and one potentially non-jurisdictional pond system within the Project Area on September 1, 2020 (Appendix A, Figure 4). No streams were identified or delineated within the Project Area. Results of the wetland and stream delineation are available, under separate cover, in the EMH&T Wetland and Stream Delineation Report. A final jurisdictional determination of the aquatic resources on-site was approved by the U.S. Army Corps of Engineers (USACE). Impacts to

these isolated wetlands requires an Isolated Wetland Permit from the Ohio Environmental Protection Agency (Ohio EPA). The delineated wetlands and pond are shown in Appendix A, Figure 4.

5 CONCLUSIONS

EDR completed a reconnaissance-level habitat assessment of the Flint Grid Energy Storage System on October 14, 2021, in compliance with the requirements of OAC 4906-4-08(B). The Project Area is primarily wooded land with one pond system, wetlands, and sporadically mowed grass patches and trails. EDR used aerial photographs, land cover data, coordination with USFWS and ODNR, and existing wetland and stream data to focus the investigation.

The literature review identified the federally listed Indiana bat and northern long-eared bat as potentially occurring within the Project Area. The field investigation identified potential bat roost trees that were dead or dying with exfoliating bark scattered throughout the Project Area. Given the Project Area provides potential habitat for listed bat species, and in accordance with ODNR and USFWS guidelines, clearing of trees ≥ 3 inches dbh is recommended to be restricted to the period between October 1 and March 31 to avoid potential adverse effects to listed bat species.

Additionally, four isolated wetlands and one non-jurisdictional pond system were identified and delineated within the Project Area. A final jurisdictional determination of the aquatic resources on-site was approved by the USACE. Impacts to these isolated wetlands require an Isolated Wetland Permit from the Ohio EPA.

6 REFERENCES

- MRLC. (2019). *National Land Cover Database*. Retrieved October 2021, from Multi-Resolution Land Characteristics Consortium: <https://www.mrlc.gov/data>
- ODNR. (n.d.). *Public Hunting & Wildlife Area Maps*. Retrieved October 2021, from Ohio Department of Natural Resources Division of Wildlife: <https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-odnr/wildlife/documents-publications/hunting-area-maps>
- USDA NRCS. (2017, December). *Conservation Fact Sheet: Conservation Compliance - Highly Erodible Land and Wetlands*. Retrieved November 2021, from https://www.nrcs.usda.gov/wps/cmیس_proxy/https/ecm.nrcs.usda.gov%3a443/fncmis/resources/WEBP/ContentStream/idd_C0BAC272-0000-CC14-9A29-62186A3B04DF/0/Compliance_HELC_WC_dec2017.pdf
- USDA NRCS. (2021). Soil Survey Geographic (SSURGO) Database for Licking County, Ohio. Retrieved October 2021, from Web Soil Survey: <https://websoilsurvey.sc.egov.usda.gov>
- USDA NRCS. (n.d.). *Ohio County Highly Erodible HEL Soil Lists*. Retrieved November 3, 2021, from Conservation Compliance - Ohio: <https://www.nrcs.usda.gov/wps/portal/nrcs/oh/programs/farmbill/cc/>
- USFWS. (2021, May 1). National Wetlands Inventory. Washington, D.C. Retrieved October 2021, from <https://www.fws.gov/wetlands>

APPENDIX A

Figures

Figure 1. Project Area Location



Flint Grid Energy Storage System

Jersey Township, Licking County, Ohio

Habitat Assessment

Project Area
0.5-Mile Study Area

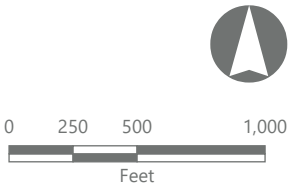
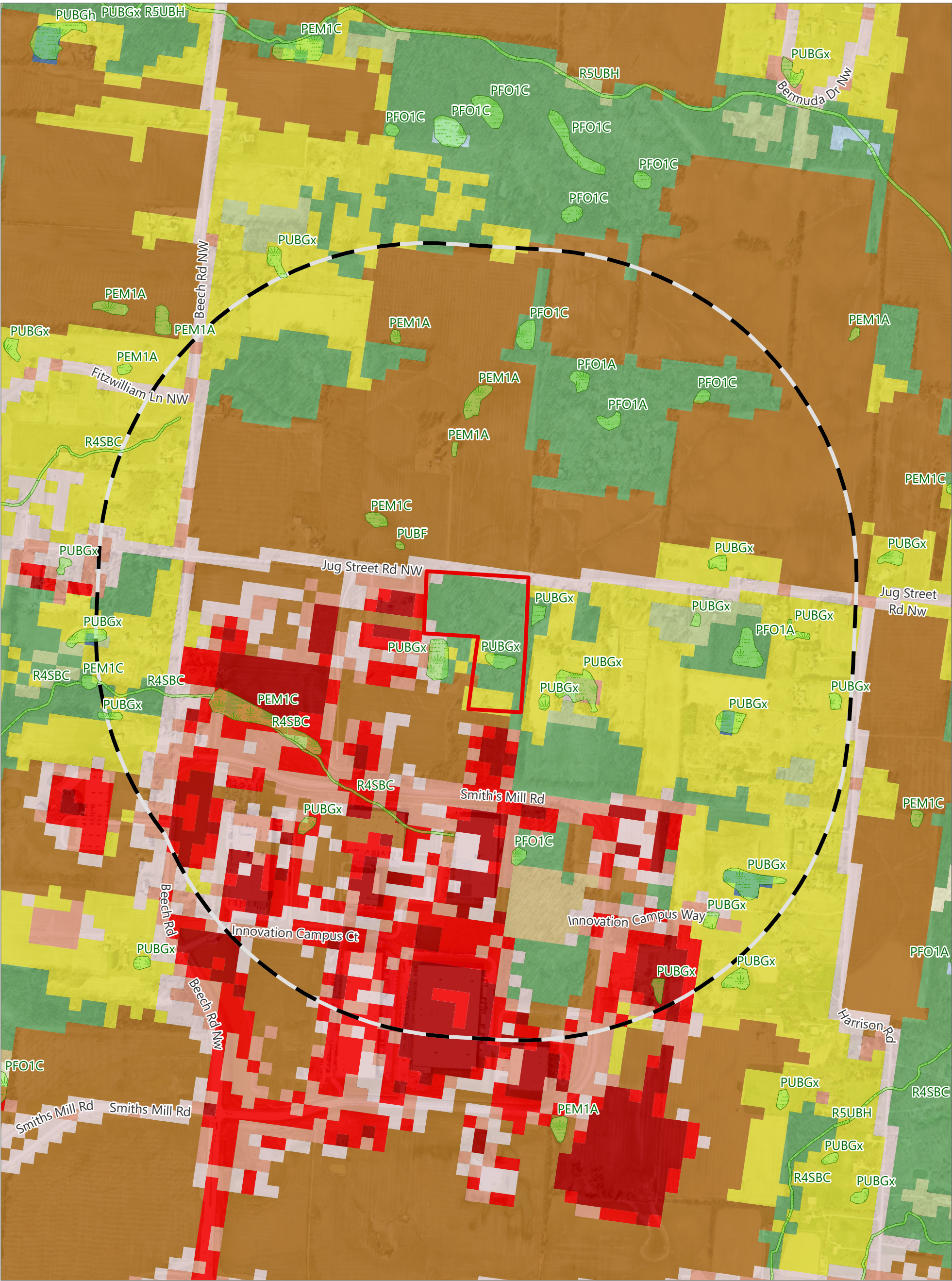


Figure 2. Land Cover



Flint Grid Energy Storage System

Jersey Township, Licking County, Ohio

Habitat Assessment

- | | | |
|---------------------|-----------------------------|----------------|
| Project Area | Developed, High Intensity | Mixed Forest |
| 0.5-Mile Study Area | Developed, Low Intensity | Open Water |
| NWI Wetland | Developed, Medium Intensity | Shrub/Scrub |
| NLCD Land Cover | Developed, Open Space | Woody Wetlands |
| Cultivated Crops | Hay/Pasture | |
| Deciduous Forest | Herbaceous | |

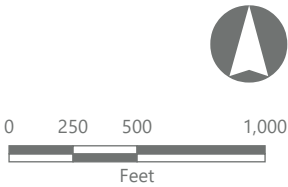
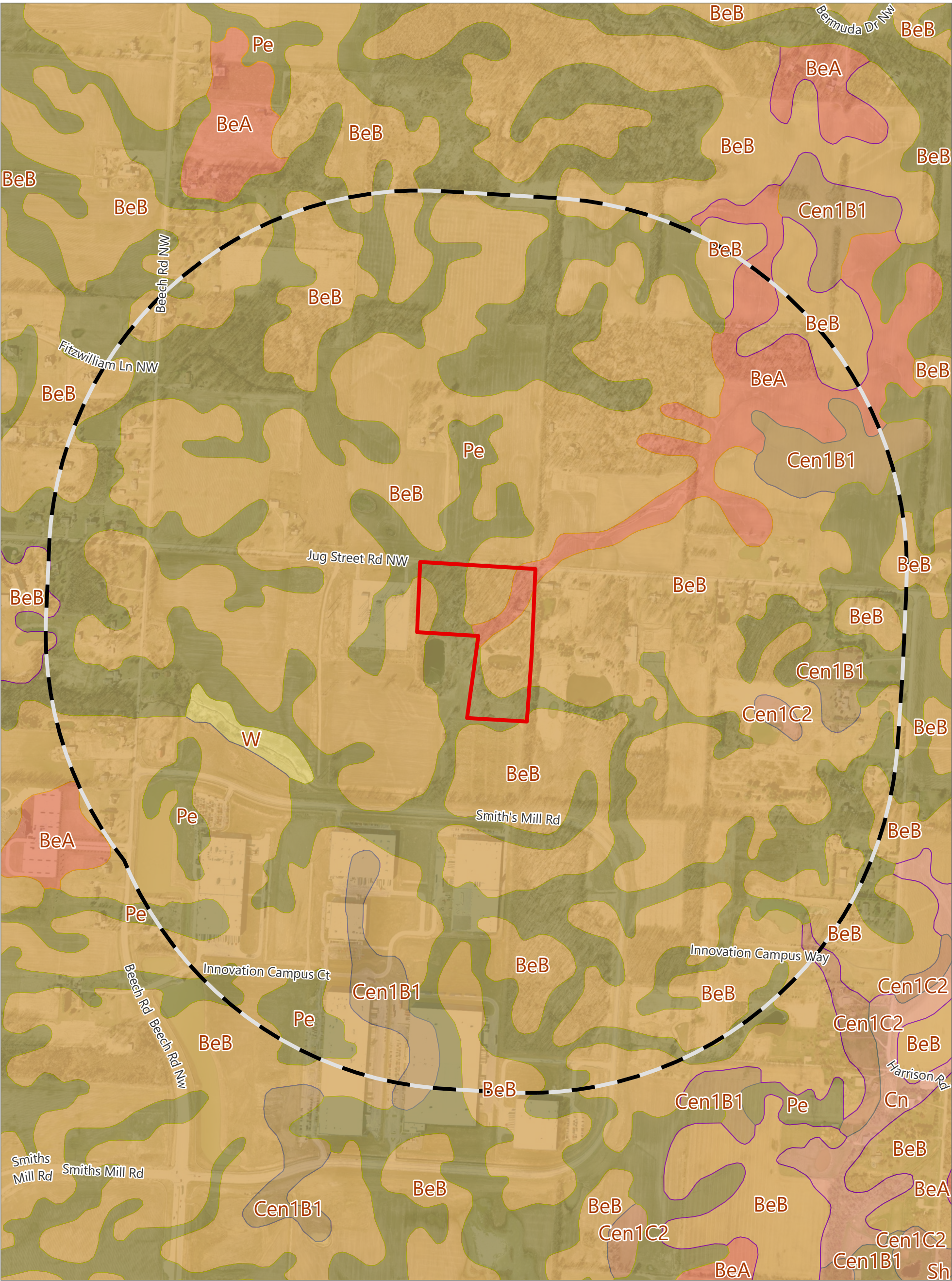


Figure 3. Soils



Flint Grid Energy Storage System

Jersey Township, Licking County, Ohio

Habitat Assessment

- Project Area
- 0.5-Mile Study Area
- USDA Soil
 - BeA
 - BeB
 - Cen1B1

- Cen1C2
- Cn
- Pe
- Sh
- W

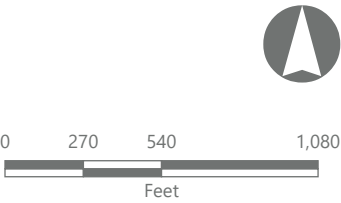


Figure 4. Field Verified Land Cover



Flint Grid Energy Storage System

Jersey Township, Licking County, Ohio

Habitat Assessment



Facility Components

- Fenceline
- Gen-tie Line
- Collection Line
- Inverter
- Battery Container
- Collection Substation

Electrical Equipment Pad

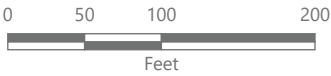
- Access Road
- Detention Swale
- Project Area

Delineated Features

- Pond
- Wetland

Land Cover

- Open Water
- Deciduous Forest
- Forested Wetland
- Emergent Herbaceous Wetland
- Grassland/Herbaceous
- Developed, Medium Intensity



APPENDIX B

USFWS and ODNR Consultation



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Jeff Johnson, Chief
Division of Natural Areas & Preserves
2045 Morse Rd, Building H
Columbus, Ohio 43229

28 September 2021

Patrick Hoyng
EMH&T
5500 New Albany Rd.
Columbus, OH 43054

Dear Mr. Hoyng,

After reviewing the Natural Heritage Database, I find we have no records of rare or endangered species in the Flint Grid Battery Energy Storage Facility Construction project area, including a one mile radius, in Jersey Township, Licking County, Ohio. We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state nature preserves, parks, wildlife areas or forests, national wildlife refuges, parks or forests or other protected natural areas within a one-mile radius of the project area.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. This letter only represents a review of rare species and natural features data within the Ohio Natural Heritage Database. It does not fulfill coordination under the National Environmental Policy Act (NEPA) or the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S. C. 661 et seq.) and does not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Please contact me at 614-265-6818 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Debbie Woischke".

Debbie Woischke
Ohio Natural Heritage Program

Hoyng, Patrick

From: Ohio, FW3 <ohio@fws.gov>
Sent: Tuesday, September 28, 2021 3:45 PM
To: Hoyng, Patrick
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate
Subject: Flint Grid Project, Jersey Township, Licking County, Ohio



UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2021-TA-2442

Dear Mr. Hoyng,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥ 3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥ 3 inches dbh cannot be avoided, we recommend removal of any trees ≥ 3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see <http://www.fws.gov/midwest/endangered/mammals/nleb/index.html>), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present. If implementation of this seasonal tree cutting recommendation is not possible, a

summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice Ashfield", with a large, stylized initial "P" and a long, sweeping underline.

Patrice Ashfield

Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

Phone: (614) 416-8993 Fax: (614) 416-8994



In Reply Refer To:

October 20, 2021

Consultation Code: 03E15000-2022-SLI-0098

Event Code: 03E15000-2022-E-00148

Project Name: Flint Grid Battery Storage Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <http://www.fws.gov/migratorybirds/RegulationsandPolicies.html>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/BirdHazards.html>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <http://www.fws.gov/migratorybirds/AboutUS.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office

4625 Morse Road, Suite 104

Columbus, OH 43230-8355

(614) 416-8993

Project Summary

Consultation Code: 03E15000-2022-SLI-0098

Event Code: Some(03E15000-2022-E-00148)

Project Name: Flint Grid Battery Storage Project

Project Type: POWER GENERATION

Project Description: Proposed battery storage facility, approximately 15 acres located in Licking County, OH.

Project Location:

Approximate location of the project can be viewed in Google Maps: [https://](https://www.google.com/maps/@40.0954227,-82.74481951451176,14z)

www.google.com/maps/@40.0954227,-82.74481951451176,14z



Counties: Licking County, Ohio

Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is final critical habitat for this species. The location of the critical habitat is not available. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: Incidental take of the northern long-eared bat is not prohibited at this location. Federal action agencies may conclude consultation using the streamlined process described at https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

APPENDIX C

Photolog

Photolog Locations



Flint Grid Energy Storage System

Jersey Township, Licking County, Ohio

Habitat Assessment

- Project Area

Delineated Features

Pond

Wetland
- Photolog Point

Forest

Habitat Site

Maintained Area

Structure

Wetland/Pond

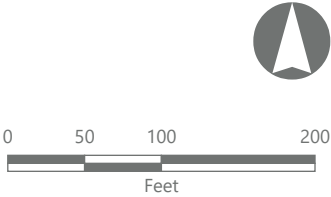




Photo 1. Habitat Site

Trees with potential roost habitat.



Photo 2. Forest

South-west property line showing a mowed trail and forested area.

Flint Grid Battery Energy Storage
Licking County, Ohio

Habitat Assessment
Appendix C: Photolog
November 2021

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Photo 3. Pond

Pond located in the center of the Project Site.



Photo 4. Maintained Site

Mowed area adjacent to the pond.



Photo 5. Structure

Dilapidated structure located on the western edge of the Project Site.



Photo 6. Maintained Area

Trail located in southern portion of the Project Site.



Photo 7. Structure

Second dilapidated structure located along the western boundary of the Project Site.



Photo 8. Maintained Area

Mowed area at the southern boundary of the Project Site. Adjacent industrial development visible in the background.

Flint Grid Battery Energy Storage
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Photo 9. Forest

Edge of forested area along the eastern boundary of the Project Site, featuring active construction directly east of the Project.



Photo 10. Pond

Edge of the pond located in the center of the Project Site.



Photo 11. Forest

Forested area located in the center of the Project Site – representative of the deciduous forest land use type.



Photo 12. Maintained Area

Large mowed path in the norther section of the Project Site.



Photo 13. Wetland

Wetland B, located along the south-western boundary of the Project Site, adjacent industrial development visible in the background.



Photo 14. Wetland

Wetland A, located in the norther portion of the Project Site.



Photo 15. Forest

Photo taken facing Jug St, showing the vegetative buffer that will remain in place for the life of the facility.



Photo 16. Forest

Photo showing the northwest corner of the Project Site.

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Photo 17. Structure

Residence currently located on the Project Site.

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**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

12/23/2021 12:05:30 PM

in

Case No(s). 21-1061-EL-BGN

Summary: Application Exhibit N Habitat Assessment electronically filed by Teresa
Orahood on behalf of Dylan F. Borchers