Blossom Solar, LLC

Blossom Solar

Exhibit Q

Ecology Impact Assessment

Case No. 22-0151-EL-BGN

Ecology Impact Assessment Report for the Blossom Solar Project

Blossom Solar, LLC

Blossom Solar Project
Project No. 132219

5/25/2022

Ecology Impact Assessment Report for the Blossom Solar Project

prepared for

Blossom Solar, LLC
Blossom Solar Project
Morrow County, Ohio

Project No. 132219

5/25/2022

prepared by

Burns & McDonnell
Columbus, Ohio

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LIST OF ABBREVIATIONS

Abbreviation	Term/Phrase/Name
BGEPA	Bald and Golden Eagle Protection Act
BMP	Best Management Practice
DOW	Division of Wildlife
DWR	Division of Water Resources
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
HHEI	Headwater Habitat Evaluation Index
MLRC	Multi-Resolution Land Characteristics
MW	Megawatt
NFHL	National Flood Hazard Layer
NHD	National Hydrography Dataset
NLCD	National Land Cover Database
NRCS	Natural Resources Conservation Service
NWI	National Wetlands Inventory
ODNR	Ohio Department of Natural Resources
OEPA	Ohio Environmental Protection Agency
ONHD	Ohio Natural Heritage Database
OPHI	Ohio Pollinator Habitat Initiative
ORAM	Ohio Rapid Assessment Method
PEM	Palustrine Emergent wetland
PFO	Palustrine Forested wetland

Abbreviation	Term/Phrase/Name
Project	Blossom Solar Project
Project Infrastructure Footprint	1,073 acres located in Morrow County, Ohio
PSS	Palustrine Scrub Shrub wetland
PUB	Palustrine Unconsolidated Bottom wetland
PV	Photovoltaic
QHEI	Qualitative Habitat Assessment Method
SDA	Soil Data Access
SMS	Solar Meteorologic Station
SSURGO	Soil Survey Geographic Database
Survey Area	1,653 acres located in Morrow and Marion Counties, Ohio
SWPPP	Storm Water Pollution Prevention Plan
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WOTUS	Waters of the U.S.

1.0 INTRODUCTION

Burns & McDonnell was retained by Blossom Solar, LLC (Blossom Solar) to provide ecology impact assessment services for the proposed Blossom Solar Project (Project) (Figures A-1.1 and A-1.2 in Appendix A). The purpose of this report is to comply with Section (B)(2) and (3) below in the OPSB rules. The figures included in this report were taken from the wetland and wildlife reports for this project.

> (2) Ecological impacts. The applicant shall provide information regarding potential impacts to ecological resources during construction.
>
> > (a) Provide an evaluation of the impact of construction on the resources surveyed in response to paragraph (B)(1) of this rule. Include the linear feet and acreage impacted, and the proposed crossing methodology of each stream and wetland that would be crossed by or within the footprint of any part of the facility or construction equipment. Specify the extent of vegetation clearing, and describe how such clearing work will be done so as to minimize removal of woody vegetation. Describe potential impacts to wildlife and their habitat.
> >
> > (b) Describe the mitigation procedures to be utilized to minimize both the short-term and long-term impacts due to construction, including the following:
> >
> > > (i) Plans for post-construction site restoration and stabilization of disturbed soils, especially in riparian areas and near wetlands. Restoration plans should include details on the removal and disposal of materials used for temporary access roads and construction staging areas, including gravel.
> > >
> > > (ii) A detailed frac out contingency plan for stream and wetland crossings that are expected to be completed via horizontal directional drilling.
> > >
> > > (iii) Methods to demarcate surface waters and wetlands and to protect them from entry of construction equipment and material storage or disposal.
> > >
> > > (iv) Procedures for inspection and repair of erosion control measures, especially after rainfall events.
> > >
> > > (v) Methods to protect vegetation in proximity to any project facilities from damage, particularly mature trees, wetland vegetation, and woody vegetation in riparian areas.
> > >
> > > (vi) Options for disposing of downed trees, brush, and other vegetation during initial clearing for the project, and clearing methods that minimize the movement

of heavy equipment and other vehicles within the project area that would otherwise be required for removing all trees and other woody debris off site.

(vii) Avoidance measures for state of federally listed and protected species and their habitat, in accordance with paragraph (D) of rule 4906-4-09 of the Administrative Code.

(3) Operational ecological impacts. The applicant shall provide information regarding potential impacts to ecological resources during operation and maintenance of the facility.

(a) Provide an evaluation of the impact of operation and maintenance on the undeveloped areas shown in response to paragraph (B)(1) of this rule.

(b) Describe the procedures to be utilized to avoid, minimize, and mitigate both the short- and long-term impacts of operation and maintenance. Describe methods for protecting streams, wetlands, and vegetation, particularly mature trees, wetland vegetation, and woody vegetation in riparian areas. Include a description of any expected use of herbicides for maintenance.

(c) Describe any plans for post-construction monitoring of wildlife impacts.

The Project is bounded to the south by State Route 309 (SR-309) and SR-288, extending west to Iberia Bucyrus Road/SR-100 and north to Crawford-Morrow Line Road/CR-8 just south of Galion, Ohio (Survey Area). The Survey Area is approximately 1,653 acres in size and is located in both Morrow and Marion Counties; However, the Project footprint was reduced following this survey and is only located within Morrow County. The Project is proposed as a 144 megawatt (MW) solar project within an area of approximately 1,073 acres.

The basic infrastructure of the Project will include solar panels mounted on racking that is single-axis tracking (arrays) affixed to metal support piles, buried cable collection and communication lines, inverter pads, access roads, a generation tie line connecting the project substation to a new utility substation, solar meteorological stations (SMSs or pyranometer), project substation and support facilities (including parking and other support infrastructure), and laydown areas. Please refer to the sections below and attached Appendices for additional information.

2.0 SITE CONDITIONS

2.1 Land Use

2.1.1 MLRC National Land Cover Database

The NLCD and aerial imagery indicate the Survey Area is primarily cultivated crops (75.4%) (Figure A-2 in Appendix A). Other common land use within the Survey Area includes hay/pasture (10.6%) and deciduous forest (8.9%). The areas surrounding the Survey Area are similar in composition, with a higher concentration of developed land to the northeast in Galion, Ohio. Table 1 summarizes the land use types that occur within the Survey Area.

Table 1: Summary of Land Use within the Survey Area

Land Use Type	Acres	Percentage of Survey Area
Cultivated Crops	1,247.24	75.44%
Hay/Pasture	175.59	10.62%
Deciduous Forest	147.41	8.92%
Developed, Open Space	53.19	3.21%
Developed, Low Intensity	16.11	0.97%
Evergreen Forest	5.91	0.36%
Shrub/Scrub	5.78	0.35%
Herbaceous	0.95	0.06%
Woody Wetlands	0.91	0.06%
Open Water	0.20	0.01%
Developed, Medium Intensity	0.05	<0.01%
Total:	**1,653.34**	**100%**

2.1.2 Agricultural Conversion Considerations

Agricultural lands comprise approximately 75% of the Survey Area, as indicated above, which will be converted to a commercial solar farm during construction of the Project. The transformation of agricultural fields to solar development will likely have minimal impacts to protected species habitat. Heavy disturbance due to annual planting and harvesting of row crops provides minimal habitat for wildlife. A commercial solar farm will also provide minimal habitat, however there is no consistent disturbance associated with the development. The solar farm will be planted with native grasses and/or wildflowers underneath the panels, which may provide habitat to animal species that currently utilize the agricultural fields. The combination of planted ground cover and lack of regular disturbance will increase soil stabilization underneath the panels. As a result, there will be less sedimentation and nutrient runoff into waterways that

surround the Project compared to the current agricultural land use. This could contribute to increased stream quality in surrounding waterways that provide potential habitat to aquatic species.

It is our understanding that Blossom Solar will implement a vegetation management plan during and after construction of the Project. The purpose of the vegetation management plan is to establish vegetative cover, manage invasive species and noxious weeds, and control erosion and sedimentation associated with construction. In smaller areas outside of the fence line and in between panels, vegetation may be planted with native legume and wildflower seed mixes to support the Ohio Pollinator Habitat Initiative (OPHI). This would create habitat for pollinators and benefit surrounding agricultural land through the pollination of cultivated fruits and vegetables. This type of vegetative cover would ultimately provide foraging habitat for insect pollinators and bird species through nectar and seed food sources.

2.2 Soils and Geology

2.2.1 USDA NRCS Web Soil Survey

The NRCS Web Soil Survey (USDA NRCS 2021a) is generated from the USDA-NRCS certified data (Figure A-3 in Appendix A). The NRCS Soil Data Access (SDA) Hydric Soils List (USDA NRCS 2021b) contains a compilation of all map units with either a major or minor component that is at least in part hydric. As the list includes both major and minor (small) percentages for map units, in some cases most of the map unit may not be hydric. The list is useful in identifying map units that may contain hydric soils.

The NRCS SSURGO digital data indicates that portions of 27 soil map units are located in the Survey Area. Seven of these soil map units are included on local and national hydric soil lists. Dominant soil types are non-hydric and include Cardington silt loam, 2 to 6 percent slopes (24.5%, 404.4 acres) and Bennington silt loam, 0 to 2 percent slopes (19%, 313.6 acres). Table 2 summarizes the soil types and hydric rating of soils within the Survey Area. Soil identified as hydric within the Survey Area is in bold in Table 2.

Table 2: Summary of Soils within the Survey Area

Soil Map Unit Name	Soil Map Unit Symbol	Hydric Rating	Acres
Amanda silt loam, 2 to 6 percent slopes	AdB	5	18.5
Amanda silt loam, 6 to 12 percent slopes, eroded	AdC2	5	79.4
Amanda silt loam, 12 to 18 percent slopes, eroded	AdD2	3	38.0
Bennington silt loam, 0 to 2 percent slopes	BeA	8	313.6
Bennington silt loam, 2 to 6 percent slopes	BeB	6	79.3
Carlisle muck, Central Ohio clayey till plain, 0 to 2 percent slopes	**Cb**	**100**	**2.9**
Centerburg silt loam, 2 to 6 percent slopes	Cen1B1	7	2.0
Condit silt loam, 0 to 1 percent slopes	**Co**	**96**	**73.1**
Cardington silt loam, 2 to 6 percent slopes	Crd1B1	7	404.4
Cardington silt loam, 6 to 12 percent slopes	Crd1C1	4	5.0
Cardington silt loam, 6 to 12 percent slopes, eroded	Crd1C2	4	113.1
Gallman silt loam, loamy substratum, 2 to 6 percent slopes	GaB	2	40.5
Gallman silt loam, loamy substratum, 6 to 12 percent slopes	GaC	0	38.6
Milford silty clay loam, 0 to 2 percent slopes	**Mf**	**93**	**37.0**
Millgrove silt loam	**Mg**	**94**	**5.4**
Pewamo silty clay loam, 0 to 1 percent slopes	**Pm**	**91**	**34.1**
Rittman silt loam, 2 to 6 percent slopes	RsB	0	115.8
Rittman silt loam, 6 to 12 percent slopes	RsC	0	1.4
Shoals silt loam, 0 to 2 percent slopes, occasionally flooded	Sh	8	4.4
Shoals silt loam, 0 to 2 percent slopes, occasionally flooded	Sj	8	1.4
Sleeth silt loam, loamy substratum, 0 to 3 percent slopes	SkA	2	153.1
Sloan silty clay loam, sandy substratum, occasionally flooded	**So**	**97**	**24.4**
Udorthents, loamy	Ud	0	0.1
Water	W	0	2.1
Westland clay loam	**We**	**93**	**11.0**
Wooster silt loam, 6 to 12 percent slopes, eroded	WsC2	4	8.3
Wooster silt loam, 12 to 18 percent slopes, eroded	WsD2	4	11.1
		Total:	**1,653.3**

Bold – listed as hydric on local and national hydric soil lists.

2.2.2 USGS 7.5-minute Topographic Maps & Geology

The USGS topographic map indicates the Survey Area crosses a generally flat area that slopes to the west (Figure A-1.2 in Appendix A). The Survey Area is located within the Central Ohio Clayey Till Plain Physiographic Region of Ohio within the Indiana and Ohio Till Plain Province. The Central Ohio Clayey Till Plain is characterized by well-defined moraines with intervening flat-lying ground moraine and intermorainal lake basins. A few large streams span the region with limited sand and gravel outwash. Elevation ranges from 700 to 1,150 feet with moderate relief (100 feet).

2.3 Listed Species Desktop Review

Information on federal- and state-listed species are provided below. For a complete evaluation of the current vegetative communities and potential wildlife species and their habitat within the Survey Area please refer to the Wildlife Report.

2.3.1 Federally Listed Species

The USFWS IPAC threatened and endangered species lists for Morrow and Marion Counties were reviewed. Summaries of the species identified are included in Table 3. The IPaC identified the federally endangered Indiana bat (*Myotis sodalis*) and federally threatened Northern long-eared bat (*Myotis septentrionalis*) as potentially present within the Survey Area. No critical habitat for the Indiana bat is located within the Survey Area. No critical habitat for the Northern long-eared bat has been designated. The IPaC did not identify any birds of particular concern that are listed on the USFWS Birds of Conservation Concern (BCC) list, however the bald eagle (*Haliaeetus leucocephalus*) warrants special attention in this area because of the BGEPA. USFWS consultation is included in Appendix B.

Table 3: Federally Threatened and Endangered Species Known or Likely to Occur in Morrow and Marion Counties, Ohio

Common Name	Scientific Name	County	Federal Listing Status	Preferred Habitat
Indiana bat	*Myotis sodalis*	Marion/Morrow	E	Winter hibernacula includes caves or abandoned mines. Summer roosting habitat includes wooded areas containing dead or dying trees or living trees that have cracks, crevices, and/or exfoliating bark and a diameter-at-breast-height (dbh) of 5 inches or greater. Tend to forage within forest or along forest edges.
Northern long-eared bat	*Myotis septentrionalis*	Marion/Morrow	T	Breeding habitat may include large undisturbed tracts of open wetlands, wet meadows, pastures, old fields, agricultural lands, shrublands and riparian corridors. Typically use fields and marsh habitat to forage and prefer larger areas.

Source: USFWS 2018. U.S. Fish and Wildlife Service - Ohio County Distribution of Endangered Species (fws.gov)
Federal Listing Status: E – Endangered, T – Threatened

2.3.2 State Listed Species

The ODNR State Listed Animal Species and Plant Species for Morrow and Marion Counties (ODNR, 2020 and ODNR, 2016) were reviewed to identify state threatened or endangered species that may be present within the Survey Area. State threatened and endangered species include a variety of mussels, birds, mammals, fish and plants. Summaries of the species identified are included in Table 4.

Table 4: State Threatened and Endangered Species Known or Likely to Occur in Morrow and Marion Counties, Ohio

Common Name	Scientific Name	County	State Listing Status	Preferred Habitat
Mussels				
Snuffbox	*Epioblasma triquetra*	Marion/Morrow	E	Small- to medium-sized creeks, in areas with a swift current, although it is also found in Lake Erie and some larger rivers. Most of the time, adults are burrowed deep in sand, gravel or cobble substrates, except when they are spawning, or the females are attempting to attract host fish.
Rayed bean	*Villosa fabalis*	Marion/Morrow	E	Smaller headwater creeks but is sometimes found in large rivers and wave-washed areas of glacial lakes.
Clubshell	*Pleurobema clava*	Marion	E	Clean, loose sand and gravel in medium to small rivers and streams.
Ohio pigtoe	*Pleurobema cordatum*	Marion	E	Medium to large rivers in sand or gravel in areas with moderate flow.
Rabbitsfoot	*Theliderma cylindrica*	Marion	E	Small to medium sized streams.
Pondhorn	*Uniomerus tetralasmus*	Marion	T	Creeks and upper reaches of larger streams in mud and sand.
Birds				
Upland sandpiper	*Bartramia longicauda*	Marion	E	Grasslands
American bittern	*Botaurus lentiginosus*	Marion	E	Freshwater wetlands with tall dense vegetation.

Common Name	Scientific Name	County	State Listing Status	Preferred Habitat
Northern harrier	*Circus hudsonius*	Marion	E	Breeding habitat may include large undisturbed tracts of open wetlands, wet meadows, pastures, old fields, agricultural lands, shrublands and riparian corridors. Typically use fields and marsh habitat to forage and prefer larger areas.
King rail	*Rallus elegans*	Marion	E	Freshwater marshes
Sandhill crane	*Grus canadensis*	Marion/Morrow	T	Freshwater wetlands, including marshes, wet grasslands and river basins.
Trumpeter swan	*Cygnus buccinator*	Marion	T	Riverine wetlands, lakes, ponds and marshes.
Least bittern	*Ixobrychus exilis*	Marion	T	Freshwater herbaceous and scrub shrub wetlands with tall and dense vegetation.
Black-crowned night heron	*Nycticorax nycticorax*	Marion	T	Large wetlands such as swamps, marshes, mud flats and also streams and rivers.
Barn owl	*Tyto alba*	Morrow	T	Variety of open habitats.
Mammals				
Northern long-eared bat	*Myotis septentrionalis*	Morrow	E	Winter hibernacula includes caves or abandoned mines. Summer roosting habitat includes wooded areas containing dead or dying trees or living trees that have cracks, crevices, and/or exfoliating bark and a dbh of 3 inches or greater. Tend to forage in forests or along forest edges.
Fish				
Iowa darter	*Etheostoma exile*	Morrow	E	Vegetated headwaters, creeks, and small to medium rivers.
Lake chubsucker	*Erimyzon sucetta*	Morrow	T	Lakes, ponds, and swamps in the Great Lakes and the Mississippi River basin.
Plants				
Philadelphia panic grass	*Panicum philadelphicum*	Marion	E	River shores, sandbars, fields, roadsides, ditches and open woodlands.
Prairie ironweed	*Vernonia fasciculata*	Marion	E	Full to part sun, average to very wet soils.

Common Name	Scientific Name	County	State Listing Status	Preferred Habitat
Midland sedge	*Carex mesochorea*	Marion	E	Dry grasslands, fields and roadsides.
Leiberg's panic grass	*Dichanthelium leibergii*	Marion	T	Moist to dry prairies
Bearded wheat grass	*Elymus trachycaulus*	Marion	T	Part shade to sun, average to dry sandy or rocky soil, prairies, savanna, dunes, shores, forest openings, rocky slopes, rock outcrops
Greene's rush	*Juncus greenei*	Marion	T	Dry, sandy sites such as sandplains, sandy road shoulders, dry fields and rock outcrops
Large blazing star	*Liatris scariosa*	Marion	T	Dry woods and clearings
Royal catchfly	*Silene regia*	Marion	T	Prairies, savannahs, barrens, open woodlands, usually on well drained rocky soils.
Prairie wedge grass	*Sphenopholis obtusata var. obtusata*	Marion	T	Mesic prairies, thinly wooded bluffs, open rocky woodlands, and pastures.
Sharp-glumed manna grass	*Glyceria acutiflora*	Morrow	T	Shores of rivers or lakes and wetland margins.

Source: ODNR 2020. https://ohiodnr.gov/wps/portal/gov/odnr/discover-and-learn/safety-conservation/about-odnr/wildlife/documents-publications/wildlife-plants-county
State Listing Status: E – Endangered, T – Threatened

Suitable habitat for listed fish and mussel species was documented at the time of the field survey. Mussels and fish typically prefer streams with free-flowing water, stable banks, and good water quality. One perennial stream (S-18) was identified within the Survey Area that exhibits free-flowing water with stable banks and could serve as potential fish and mussel habitat. S-18 is a named perennial stream (Mud Run) located on the western edge of the Survey Area. This stream is designated as warmwater habitat and is part of a larger drainage network that eventually drains into the Olentangy River. S-18 received a QHEI score of 65, indicating good habitat quality, and could potentially provide habitat for listed fish and/or mussel species. No mussel or fish populations were observed in this stream at the time of the site visit. For a more detailed assessment, a mussel presence/absence survey and fish survey may be required. No relic mussel shells were observed within or adjacent to streams within the Survey Area. ODNR consultation

did not note any listed mussel species as potentially present within the Project. The client has advised Burns & McDonnell that no in-water work will be conducted from March 15 to June 30.

Many state-listed bird species that occur within Morrow and Marion Counties prefer freshwater wetlands that include both marshes and swamps. Multiple wetlands (W-1, W-12, W-13, W-14, W-16, W-17, W-18, and W-22) identified within the Survey Area consisted of larger portions of emergent wetland area, however, these wetlands are designated as Category 1 lower quality wetlands and are surrounded by active agriculture and minimal buffers to protect from disturbance. As such, it is very unlikely these wetlands would provide potential habitat for state-listed bird species.

Suitable potential bat habitat was observed within forested habitat documented within the Survey Area at the time of the site visit. No species-specific surveys were conducted during the site visits. In order to avoid impacts to bat species, impacts to forested habitat located within the Project will be minimized to the maximum extent possible. Any tree clearing activities associated with the Project will be conducted between October 1 and March 31.

State-listed plant species for this Project would be expected to occur within wetlands, streams, and woodlands. Given the constant disturbance of active agriculture, surrounding grasslands and existing habitat fragmentation, it is unlikely plant species would inhabit areas within the Project. Furthermore, if plant species are present within wetland and forest habitats, it is unlikely any impacts would occur as the Project proposes to minimize impacts to wetlands, streams and forest habitat.

3.0 AGENCY CONSULTATION

3.1.1 U.S. Fish and Wildlife Service

An environmental review letter was submitted to the USFWS on May 10, 2021, to receive consultation on impacts to federally threatened and endangered species. USFWS responded on May 25, 2021, and indicated that the Northern long-eared bat (*Myotis septentrionalis*) and Indiana bat (*Myotis sodalis*) may be present within the Survey Area where suitable habitat occurs. USFWS recommends tree clearing between October 1 and March 31 to avoid impacts to Northern long-eared bats and Indiana bats. If tree clearing must occur outside of this timeframe, presence/absence surveys will need to be conducted to confirm absence of in areas of suitable habitat. The client has advised Burns & McDonnell that tree clearing activities associated with this project will be conducted between October 1 to March 31 to avoid impacts to bat species. USFWS does not anticipate any other adverse effects to federally threatened, endangered, or sensitive species. USFWS recommends minimizing any impacts to waterbodies and wetlands. It is our understanding that Blossom Solar intends to minimize tree clearing where possible and adhere to seasonal restrictions on tree clearing to avoid any potential effect on the listed bat species.

USFWS, in partnership with the Ohio Pollinator Habitat Initiative (OPHI), provided an Ohio Solar Site Pollinator Habitat Planning and Assessment Form to enhance pollinator habitat at solar power installations. USFWS recommends planting legumes and wildflowers instead of non-native grasses between solar panels to benefit pollinators. The recommended legumes and wildflowers provided in the form are low-growing and would minimize shadows throughout the solar facility. The USFWS environmental review response letter and Ohio Solar Site Pollinator Habitat Planning and Assessment Form are included in Appendix B.

3.1.2 Ohio Department of Natural Resources

An environmental review letter was submitted to the ODNR on May 10, 2021, to receive consultation on impacts to state threatened and endangered species. ODNR responded on June 24, 2021 (Appendix B) with comments based on an interdisciplinary review with input from the Ohio Natural Heritage Database (ONHD), the Division of Wildlife (DOW), and the Division of Water Resources (DWR).

The ONHD conducted a review of state threatened or endangered plant and animal species within a one-mile radius of the Survey Area. According to the ONHD, no records of state threatened or endangered species are present within one-mile of the Survey Area. There are also no records of state species of special interest or state species of concern. Lastly, no records exist for any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the Survey Area.

The DOW recommends that impacts to streams, wetlands, and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The DOW indicates that the entire state of Ohio is within the range of the state endangered and federally threatened Indiana bat (*Myotis sodalis*), the state endangered and federally threatened northern long-eared bat (*Myotis septentrionalis*), the state endangered little brown bat (*Myotis lucifugus*), and the state endangered tricolored bat (*Perimyotis subflavus*). If suitable habitat is present and trees must be cut within the Project, the DOW recommends cutting only occur from October 1 to March 31. If tree removal must occur during the summer months, the DOW recommends that mist net surveys or acoustic survey be conducted from June 1 to August 15 prior to any tree cutting. The client has advised Burns & McDonnell that tree clearing activities associated with this Project will be conducted between October 1 to March 31 to avoid impacts and adverse effects to bat species. Therefore, no summer and/or potential hibernacula surveys are recommended.

According to the DOW, the Survey Area is also within the range of the state endangered fish, the Iowa darter (*Etheostoma exile*), and the state threatened fish, the lake chubsucker (*Erimyzon sucetta*). The DOW recommends that no in-water work occur in perennial stream from March 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat. The client has advised Burns & McDonnell that no in-water work will be conducted from March 15 to June 30.

The DOW also commented that the Survey Area is within the range of the state threatened sandhill crane (*Grus canadensis*). This species primarily utilizes wetland areas and roosts in shallow, standing water or moist bottomlands. The DOW recommends that if grassland, prairie,

or wetland habitat will be impacted, construction in these areas should be avoided during the species' nesting period of April 1 through August 31. No grassland or prairie habitats were identified within the Survey Area or Project.

The DWR recommends that the local floodplain administrator be contacted for the possible need of any floodplain approvals or permits for this Project. No floodplains or floodways were identified within the Survey Area or Project.

The ODNR correspondence letter is included in Appendix B.

4.0 PRE-CONSTRUCTION SURVEYS

4.1 Wetland and Surface Water Resources

The USGS NHD and USFWS NWI were reviewed prior to the field survey site visit to identify any potential wetlands and surface waters that may be present within the Survey Area. Wetlands and waters are important because they provide habitat for many species that are adapted to aquatic environments. The USFWS NWI data shows remotely identified wetlands, which may be based on previous aerial imagery interpretation and soil surveys, while the USGS NHD uses digital stream information to identify potential waterways (Figure A-4, Appendix A). The following sections describe the findings of the wetland delineation and wildlife literature and field surveys.

4.1.1 Site Investigation Results

During the site investigation, a total of 26 wetlands were delineated within the Survey Area for a total of 51.74 acres. Category 1 wetlands accounted for 35.85 acres of wetland and Category 2 wetlands accounted for 15.89 acres of wetland. Relatively few wetlands were identified given the size of the Survey Area, and no high-quality Category 3 wetlands were documented within the Survey Area. A large portion of the wetlands identified are either located within forest habitat, or along field edges. A total of 19 surface waters were identified within the Survey Area during the site investigation for a total of 21,225 linear feet. Of the 19 surface waters identified, 17 were classified as ephemeral, one was classified as intermittent, and one was classified as perennial. It is our professional opinion that all 26 wetlands and 19 surface waters are considered to be WOTUS, jurisdictional and regulated by USACE. An USACE approved and preliminary jurisdictional determination was received on January 14, 2022, indicating that the 26 wetlands and 19 streams are waters of the U.S. and regulated by the USACE (Appendix D). Avoidance of wetlands, surface waters and other waterbodies should be considered in Project planning. Details of the delineated wetlands and streams can be found in Tables 5 and 6 and are shown on Figure A-5 in Appendix A.

A total of five constructed ponds were identified within the Survey Area during the site investigation for a total of 1.51 acres. These ponds are used as either a water source for agricultural crops or livestock and have a defined bed and bank and surface water. These ponds

appear to be manmade and constructed in upland soils, and therefore, are not considered wetlands. It is our professional opinion that the five constructed ponds are not WOTUS and not regulated by the USACE or the State. An USACE approved and preliminary jurisdictional determination was received on January 14, 2022, indicating that the five ponds are not considered waters of the U.S. and not regulated by the USACE (Appendix D). The Ohio EPA may regulate these features; however, the current Project layout causes no impacts to construction ponds. Details of the delineated constructed ponds can be found in Table 5.

4.2 Habitat Assessment

4.2.1 Vegetative Community

The vegetation throughout the Survey Area was comprised primarily of agricultural row crops with scattered areas of open field herbaceous habitat and forested habitat. Active agricultural fields were present throughout the majority of the Survey Area. The row crops planted in these areas consisted entirely of soybeans (*Glycine max*) and corn (*Zea mays*). Open field herbaceous habitat was present in smaller portions throughout the Survey Area. These areas were characterized by fallow fields that were not sowed for crops that year or transitional old fields between deciduous forest and active agriculture. Upland herbaceous vegetation within these areas included golden alexander (*Zizia aurea*), Kentucky bluegrass (*Poa pratensis*), Canada goldenrod (*Solidago canadensis*), meadow garlic (*Allium canadense*), barnyard grass (*Echinochloa crus-galli*), smooth brome (*Bromus inermis*), and black raspberry (*Rubus occidentalis*). Forested habitat was also present throughout the Survey Area in the portions of land not being used for cultivated crops. Multiple woodland locations exist that range in size from approximately 0.5 acres to 17 acres. Common tree species observed in these areas included American beech (*Fagus grandifolia*), silver maple (*Acer saccharinum*), shagbark hickory (*Carya ovata*), northern red oak (*Quercus rubra*), black cherry (*Prunus serotina*), musclewood (*Carpinus caroliniana*), black walnut (*Juglans nigra*), hackberry (*Celtis occidentalis*), and box elder (*Acer negundo*).

4.2.2 Wildlife

Wildlife within the Project could potentially use the existing habitats as areas for foraging, migratory stopover, breeding/nesting, and/or shelter. Based on the current land use, species

present in the vicinity of the Project are primarily associated with agricultural fields, open field herbaceous habitat, forested habitat, open water habitat, wetlands and streams.

No evidence of bat activity was observed during the site investigation; however, field surveys were completed during daylight hours when bats are generally not active. Furthermore, species-specific surveys were not conducted as part of the field surveys. No publicly available records of known bat habitat are within the Survey Area or its 0.25-mile buffer. Suitable bat habitat was observed within the Survey Area at the time of the site visit. Approximately 73.3 acres of forested area had potential bat habitat and included live trees and/or snags with exfoliating bark, crevices, or hollow cavities.

Burns & McDonnell also assessed the site for the presence of potential habitat that could support listed mussels, birds, fish and plants. One perennial stream (S-18) was identified within the Survey Area that exhibits free-flowing water with stable banks and could serve as potential fish and mussel habitat. No mussel or fish populations were observed in this stream at the time of the site visit. No impacts to S-18 are proposed. Multiple wetlands (W-1, W-12, W-13, W-14, W-16, W-17, W-18, and W-22) identified within the Survey Area consisted of larger portions of emergent wetland area that could provide habitat for listed bird species. However, these wetlands are designated as Category 1 lower quality wetlands and are surrounded by active agriculture and minimal buffers to protect from disturbance. As such, it is very unlikely these wetlands would provide potential habitat for state-listed bird species. State-listed plant species for this Project would be expected to occur within wetlands, streams, and woodlands. Given the constant disturbance of active agriculture, surrounding grasslands and existing habitat fragmentation, it is unlikely plant species would inhabit areas within the Project. Furthermore, if plant species are present within wetland and forest habitats, it is unlikely any impacts would occur as the Project proposes to minimize impacts to wetlands and forest habitat. Impacts to wetlands and streams will be minimized to the maximum extent practicable.

Table 5: Summary of Wetlands and Other Waters within the Survey Area

Wetland Number[a]	Wetland Type[b]	ORAM Score	ORAM Category[c]	Area of Wetland Delineated in Survey Area (acres)
W-1	PEM	16	Category 1	5.31+
W-2	Mosaic	47.5	Category 2	3.96+
W-3	PEM/PFO	58	Category 2	3.63+
W-4	PEM/PFO	51	Category 2	1.34+
W-5	PEM	55.5	Category 2	0.10+
W-6	PEM/PSS	23	Category 1	0.21
W-7	PFO	54.5	Category 2	0.59
W-8	PEM	22.5	Category 1	0.29
W-9	PEM/PFO	48.5	Category 2	0.43
W-10	PEM/PFO	40	Category 2	2.67+
W-11	PFO	50	Category 2	0.07
W-12	PEM	11	Category 1	0.67
W-13	Farmed	13	Category 1	12.79+
W-14	PEM	27	Category 1	12.03
W-15	PEM	19	Category 1	0.09+
W-16	PEM	25	Category 1	2.70
W-17	PEM	23.5	Category 1	0.68+
W-18	PEM	28.5	Category 1	0.11+
W-19	PEM	20.5	Category 1	0.07
W-20	PEM	23.5	Category 1	0.10
W-21	PEM	42.5	Category 2	0.21
W-22	PEM	28	Category 1	0.30
W-23	PEM/PFO	49	Category 2	2.74
W-24	PEM/PSS	12.5	Category 1	0.43
W-25	PEM/PSS	31	Category 2	0.15
W-26	PEM	23	Category 1	0.09+
Constructed Pond 1	--	--	--	0.29
Constructed Pond 2	--	--	--	0.37
Constructed Pond 3	--	--	--	0.24
Constructed Pond 4	--	--	--	0.32
Constructed Pond 5	--	--	--	0.29
Total:				**51.74**

[a] Assigned by Burns & McDonnell staff during the site investigation; W = Wetland
[b] Classification follows the Federal Geographic Data Committee, 2013; PEM = Palustrine Emergent, PSS= Palustrine Scrub Shrub, PFO = Palustrine Forested
[c] ORAM Categories: Category 1 = 0-29.9; Category 1 or 2 Gray Zone = 30-34.9; modified Category 2 = 35-44.9; Category 2 = 45-59.9; Category 2 or 3 Gray Zone = 60-64.9; Category 3 = 65-100
-- = No Value
+ = Area extends outside the Survey Area

Table 6: Type and Length of Streams Delineated within the Survey Area

Stream Number[a]	Stream Type[b]	Stream Name[c]	QHEI/ HHEI	Substrate	OHWM Width (feet)	OHWM Height (feet)	Surface Water Depth (feet)	Length of Delineated Stream in Survey Area (feet)
S-1a	E	UNT Flat Run	70	Cobble, gravel, sand, silt, detritus	5	0.5	0.25	363
S-1b	E	UNT Flat Run	64	Sand, silt, woody debris, detritus, muck	8	0.75	0.25	148+
S-1c	E	UNT Flat Run	55	Gravel, sand, silt detritus	8	1.5	0.5	425+
S-2	E	Unnamed Stream	65	Boulder slabs, cobble, gravel, silt, detritus	5	1	0.25	303+
S-3	E	Unnamed Stream	39	Silt, woody debris, detritus	4	1	0.25	140+
S-4	I	UNT Flat Run	40	Silt, clay	5	5	0.25	2,744+
S-5	E	UNT Flat Run	64	Cobble, gravel, sand silt	5	2	0.25	757
S-6	E	UNT Flat Run	50	Cobble, gravel, sand, silt, detritus	4	1.5	0.25	422
S-7	E	UNT Flat Run	49	Silt, woody debris, detritus	8	2	0.5	2,915+
S-8	E	UNT Flat Run	37	Silt	4	0.5	0.1	242+
S-9	E	UNT Flat Run	64	Cobble, gravel, silt, detritus	5	4	0.25	2,146+
S-10	E	UNT Flat Run	27	Silt	4	0.5	0.1	322
S-11	E	UNT Flat Run	63	Cobble, gravel, silt	5	3	0.5	1,319+

Stream Number[a]	Stream Type[b]	Stream Name[c]	QHEI/ HHEI	Substrate	OHWM Width (feet)	OHWM Height (feet)	Surface Water Depth (feet)	Length of Delineated Stream in Survey Area (feet)
S-12	E	UNT Flat Run	42	Silt	5	0.75	0.2	162
S-13	E	Unnamed Stream	12	Silt	12	5	0.75	1,757
S-14	E	UNT Mud Run	70	Boulder, cobble, gravel, silt, woody debris	10	3	0.5	3,119+
S-15	E	UNT Mud Run	69	Cobble, gravel, silt, woody debris	6	2	0.5	369+
S-16	E	UNT Mud Run	43	Silt, woody debris	3	1.5	0.1	693
S-17	E	UNT Mud Run	63	Cobble, gravel, silt	4	3	0.2	782+
S-18	P	Mud Run	65	Gravel, sand, silt	25	6	2	1,862+
S-19	E	Unnamed Stream	36	Boulder, cobble, gravel, silt	4	3	0	235
							Total:	**21,225**

Assigned by Burns & McDonnell staff during the site investigation; S = stream
[a] Stream name follows USGS topographic map, NHD, or state/local data source;
[b] P = Perennial, I = Intermittent, E = Ephemeral
[c] UNT = Unnamed Tributary
-- = No Value
+ = Area extends outside the Survey Area

5.0 ESTIMATED PROJECT IMPACTS

5.1 Project Infrastructure Summary

The proposed Project infrastructure will consist of photovoltaic (PV) panel arrays, electrical collection lines, inverters, substation, fence line, access roads, and laydown yards. The Project is anticipated to temporarily impact up to 1,037.72 acres during construction and permanently impact up to 56.53 acres during operation. The solar infrastructure will be located within a 1,073 acre fenced in area. The total acres of permanent impact may be reduced with revised Project siting to further minimize or avoid impacts.

The Blossom Solar Project will generally consist of the following infrastructure:

- Solar Panels
    - PV panels will be mounted on racking that is single-axis tracking, with a maximum operational height of up to 15 feet high at the highest point.
    - Panels will be grouped into a series of circuits (strings or rows).
    - Panel support piles less than 1 square foot (SF) of surface impact each, directly driven 5 to 15 feet below ground surface (up to 31,275 piles, or up to 0.03 acre total spread across a 835 acre array area).
- Project Substation and Support Facilities
    - Up to 2.5 acres of permanent impact from the Project Substation,, parking areas and other supporting infrastructure. Approximately 3 acres of associated temporary impacts.
    - Up to 27.2 miles of security fencing and access gates, enclosing an area of approximately 1,073 acres.
- Inverters
    - There are 40 proposed central inverters, each to be located within an up to 750 SF gravel area, some of which may include one of eight-on-site solar meteorological

stations (SMSs or pyranometer), which could consist of irradiance (solar energy) meters as well as air temperature and wind meters.

  - Up to approximately 1 acre of permanent impacts.

- Collection and Communication Lines
  - Up to 18.6 miles of linear impacts from burying cable, 50-foot-wide temporary work area (115 acres).
  - MV and DC lines buried according to National Electric Code standards.
- Access Roads
  - Up to 10.6 miles of access road.
  - Access roads will have an impact width of up to 25 feet during construction to accommodate locations requiring cut and fill or clearance for two delivery vehicles. Permanent impacts from access roads will consist of maintained 16 feet wide access roads during post-construction.
  - Approximately 33 acres of temporary impacts and 21 acres of permanent impacts from access roads.
- Equipment Laydown Areas
  - These staging areas may be covered with timber matting, gravel with an under lay of geosynthetic fabric, or other suitable material to separate the native soil from the construction materials.
  - Approximately 51 acres of temporary impacts and up-to 0 acres of permanent impacts.

Table 7 provides a summary of the reviewed and proposed infrastructure.

Table 7: Summary of Proposed Blossom Solar Project Permanent Infrastructure

Features	Maximum Values
Project Generation Capacity	144 MW
Project Infrastructure Footprint	1,073 acres
Solar Arrays	835 acres
Solar Array Piles	0.03 acre
Inverter Pads	1 acre
Supporting Facilities*	2.50 acres
Collection Lines (buried)	All buried – 0 acres (18.60 miles)
Permanent Access Roads (gravel-covered)	21 acres (10.60 miles)

*Supporting facilities include Project substation, parking, and additional space for any equipment storage.

5.2 Natural Resource Impacts Summary

Overall, the Blossom Solar Project will likely have minimal environmental impacts. Impacts are proposed primarily to land that has already been heavily disturbed and minimized for habitats that may support significant wildlife. The greatest impact will be to disturbed upland areas (primarily active agriculture) with reduced impact to forested areas, wetlands, and streams. Active agricultural land, and a small portion of forest, will be converted to a different type of land use to house solar panel arrays and associated infrastructure.

The temporary conversion of active agriculture and disturbed upland areas will have minimal impact to floral and faunal communities. These habitats are disturbed on a seasonal and/or annual basis and provide minimal habitat for common species. Conversion of land for use for solar would likely provide similar habitat support for floral and faunal communities, however, would not be as heavily disturbed and could possibly support a more diverse species mix. Furthermore, ground cover within the Solar Project will be managed and maintained to prevent erosion and sediment runoff which is typically associated with agricultural fields. Impact to a small portion of forested habitat will occur as part of the solar array design. This forested area will be converted and maintained as herbaceous upland habitat. Conversion will impact the support of woodland species; however, land will support other floral and faunal community types.

The Project has been designed to avoid and/or minimize impacts to wetlands, streams, waterbodies, forested habitat, and areas where habitat to support significant floral and faunal

communities may be present. A summary of potential impacts to existing environmental features within the Project are presented in Tables 8 and 9 below.

Table 8: Summary of Proposed Blossom Solar Project Temporary Impacts

Impact Type	Upland Soil (Acres)	Forested Uplands (Tree Clearing) (Acres)	Wetland (Acres)	Streams (Acres)	Streams (Linear Feet)	Ponds (Acres)
Access Roads	33	0	0	0.08	164	0
Collection Line	115	0	0.14	0.06	650	0
Equipment Laydown Area	51	0	0	0	0	0
Substation	3	0	0	0	0	0
Solar Arrays	835	0	0	0	0	0
Array Pilings	0	0	0	0	0	0
Inverter Pads	0	0	0	0	0	0
Gen-Tie Line	0.72	0	0	0	0	0
	1,037.72	**0**	**0.14**	**0.14**	**814**	**0**

***Data was interpreted from most recent NLCD database and aerial imagery (2019).**

Table 9: Summary of Proposed Blossom Solar Project Permanent Impacts

Impact Type	Upland Soil (Acres)	Forested Uplands (Tree Clearing) (Acres)	Wetland (Acres)	Streams (Acres)	Streams (Linear Feet)	Ponds (Acres)
Access Roads	21	0	0	0.05	164	0
Collection Line	0	0	0	0	0	0
Equipment Laydown Area	0	0	0	0	0	0
Substation	2.5	0	0	0	0	0
Solar Arrays	0	32				
Array Pilings	0.02	0.01	0	0	0	0
Inverter Pads	1	0	0	0	0	0
Gen-Tie Line	0	0	0	0	0	0
Totals:	**24.52**	**32.01**	**0**	**0.05**	**164**	**0**

***Data was interpreted from most recent NLCD database and aerial imagery (2019).**

5.2.1 Land Use

The project consists primarily of active agriculture lands (75.4%). Other common land use within the Survey Area and Project includes hay/pasture (10.6 percent) and deciduous forest (8.9

percent) as isolated woodlots. The most significant impact will come from the temporary conversion of agricultural lands to accommodate the solar panel arrays. The temporary conversion from agricultural lands to solar project is expected to have a negligible environmental impact because agriculture fields provide minimal habitat for floral and faunal communities. Additionally, the proposed row spacing, elevation of the solar panels above the ground, and low-impact pilings will allow for managed vegetation beneath the array for erosion control, simultaneously providing a habitat similar to planted agricultural fields.

5.2.2 Uplands

This Project layout has been designed primarily within upland areas. Solar arrays and infrastructure footprint has been minimized within natural resources and forested habitat to reduce impacts. Impacts to upland soils and tree clearing areas are discussed below.

5.2.2.1 Soil

The majority of impacts to the Project will occur as a result of upland soil disturbance for construction of supporting infrastructure, both temporary (1,037.72) and permanent (56.53). Solar panels are supported by pilings in the ground. Each support will be directly driven 5 to 15 feet below the ground surface, with a footprint of less than 1 SF. Approximately 31,275 pilings will total 0.02 acre, spread across the 835 acres of panel arrays. Support infrastructure, including inverter pads (1 acre), access roads (21 acres), a Project substation with supporting infrastructure (2.5 acres) are all included as maximum permanent upland soil impacts.

5.2.2.2 Forested Uplands/Tree Clearing

Forested areas within the Project will be preserved where possible, however, Blossom Solar anticipates the need to clear portions of select woodlots and other woody vegetation in order to construct and operate the Project. Approximately 32 acres of the 147 acres of woody vegetation is anticipated to be cleared. Approximately 31,275 pilings will total 0.01 acre, spread across the 32.01 acres of panel arrays.

Blossom Solar is committed to minimizing tree clearing and observing seasonal tree clearing restrictions designed to protect listed bat species (e.g., tree clearing within approved timeframe of October 1 through March 31). Timber and other vegetative debris may be chipped for use as

erosional control, mulch, or disposed of accordance with applicable regulations and landowner preferences.

5.2.3 Wetlands and Waterbodies

Burns & McDonnell delineated 26 wetlands during the field survey, for a total of 51.74 acres of wetlands within the Survey Area. Fifteen wetlands are classified as palustrine emergent, two wetlands are classified as palustrine forested, and nine wetlands are classified as wetland complexes. Based on the Ohio EPA ORAM, fifteen wetlands scored as Category 1 and 11 wetlands scored as Category 2. It is our professional opinion that all wetlands are jurisdictional and regulated by the USACE. A USACE approved and preliminary jurisdictional determination was received on January 14, 2022, indicating that the 26 wetlands and 19 streams are waters of the U.S. and regulated by the USACE (Appendix D). The current Project layout aims to minimize impacts to wetlands. Approximately 0.14 acre of temporary impact to PEM wetland habitat is proposed from the installation of collection lines.

Nineteen streams were delineated during the field survey, for a total of 21,225 linear feet of stream within the Survey Area. Of the 19 surface waters identified, 17 were classified as ephemeral, one was classified as intermittent, and one was classified as perennial. It is our professional opinion that all wetlands are jurisdictional and regulated by the USACE. A USACE approved and preliminary jurisdictional determination was received on January 14, 2022, indicating that the 26 wetlands and 19 streams are waters of the U.S. and regulated by the USACE (Appendix D). The current Project layout aims to minimize impacts to wetlands. Approximately 0.14 acre of temporary impact of ephemeral stream habitat is proposed for installation of access roads and collection lines and 0.05 acre of permanent impact of ephemeral stream habitat for access roads.

Five construction ponds were delineated within the Survey Area. These ponds are used as either a water source for agricultural crops or livestock and are expected to be highly impacted by surrounding land use. Given the location of these ponds within surrounding agricultural areas, it is not likely these waterbodies serve as habitat for any protected or listed species. It is our professional opinion that the five constructed ponds are not WOTUS and not regulated by the USACE or the State. A USACE approved and preliminary jurisdictional determination was

received on January 14, 2022, indicating that the five ponds are not considered waters of the U.S. and not regulated by the USACE (Appendix D). The Ohio EPA may regulate these features; however, the current Project layout causes no impacts to construction ponds.

Through careful design and avoidance measures, Blossom Solar anticipates minimal permanent impacts to delineated wetlands or waterbodies within the Project, with up to 0.05 acre of stream impact for access roads. Detailed tables of anticipated wetland and waterbody impacts, and proposed construction methods are provided in Appendix C, Wetland and Waterbody Impact Tables. Proposed impacts are illustrated in preliminary layout design figure in Appendix A of the Ohio Power Siting Board application.

Final array and layout designs are not finalized, but based on preliminary work, up to 10.6 miles of new permanent gravel access roads will be installed for construction, operation, and maintenance of the Project, and are anticipated to minimally permanently impact streams.

In addition to the above-mentioned measures, Blossom will obtain coverage under the NPDES construction general permit for construction activities over 1 acre, to prevent adverse effects from construction related stormwater runoff. Additionally, Blossom will prepare a SWPPP incorporating the most appropriate sediment and erosion control measures and BMPs to ensure surface waters in proximity to the Project disturbance areas are not impacted. Surface waters within the Project will not be used during or for construction of the Project; however, water may be brought to the Project. Blossom plans to restore all disturbed waterbodies from construction to pre-construction conditions.

As construction and operation of the Project does not require the withdrawal of local source water, there are no expected impacts to water users anticipated as a result of the Project.

5.2.4 Aquatic and Wildlife Resources

The Project is not anticipated to significantly impact wildlife or habitat. Information on existing wildlife in the Project was obtained from a variety of sources, including observation during site surveys and publicly available data from Federal and State agencies. Wildlife within the Project could potentially utilize the site habitat for foraging, migratory stopover, breeding, and/or shelter. Based on the current land use, species present in the Project vicinity are primarily associated

with agricultural fields, open herbaceous fields, isolated woodlots, wetland and stream areas. Typical wildlife species observed during the field survey are common wildlife species.

Typical construction-related impacts to wildlife include incidental injury and mortality of juvenile and/or slow-moving animals due to construction activity and vehicular movement; construction-related silt and sedimentation impacts on aquatic organisms; habitat disturbance/loss associated with clearing and earthmoving activities; and displacement of wildlife due to increased noise and human activities. However, the Project has been designed to avoid and/or minimize such impacts. The Project has been designed to locate the majority of infrastructure within active agricultural land, which only provides habitat for a limited number of wildlife species. The few birds and mammals that may forage within these fields should be able to vacate areas that are being disturbed by construction activities. On a landscape scale, these is abundant availability of similar agricultural fields within the vicinity of the Project.

5.2.5 Threatened and Endangered Species

The Project and 0.25 buffer are not known to provide permanent habitat for sensitive bird, bat, or freshwater mussel species.

Due to the lack of adequate habitat in the immediate vicinity of the Project, it is like many of the individuals would opt for higher quality habitat nearby such as wildlife areas and state parks for roosting, foraging and breeding. Blossom has prioritized avoidance measures for sensitive habitats, such as minimizing habitat fragmentation, siting infrastructure in uplands rather than wetlands, and minimizing perennial stream crossings. Based on current Project designs, significant impacts to these habitats are not anticipated.

5.2.6 Disposal of Plant-Generated Wastes

The storage and use of fuel, lubricants, and other fluids could create a potential contamination hazard during Project construction. The impact of leaks and spills will be minimized or avoided by restricting the location of refueling activities and by requiring immediate cleanup of spills and leaks of hazardous materials. Construction equipment will be maintained regularly, and the source of any leaks will be identified and repaired immediately. And soil contaminated by fuel or oil spills would be removed and disposed of at an approved disposal site.

Temporary portable sanitary facilities would be installed during construction and sanitary wastes would be disposed of by the contractor.

Project construction will generate some solid waste, primarily plastic, wood, cardboard and metal packaging materials, construction scrap, and general refuse. Construction waste will be collected and disposed of in dumpsters located at the laydown areas. The dumpsters will be emptied on an as needed basis and dispose of materials at a licensed solid waste disposal facility. Waste volumes are expected to be minimal and will not affect local waste disposal facilities.

As indicated above, staff will monitor Project operations from an offsite location, and conduct periodic cleaning and on-site maintenance procedures, as needed. The minimal wastes generated from these activities will be removed from the Project site and disposed of in accordance with federal, state and local regulations.

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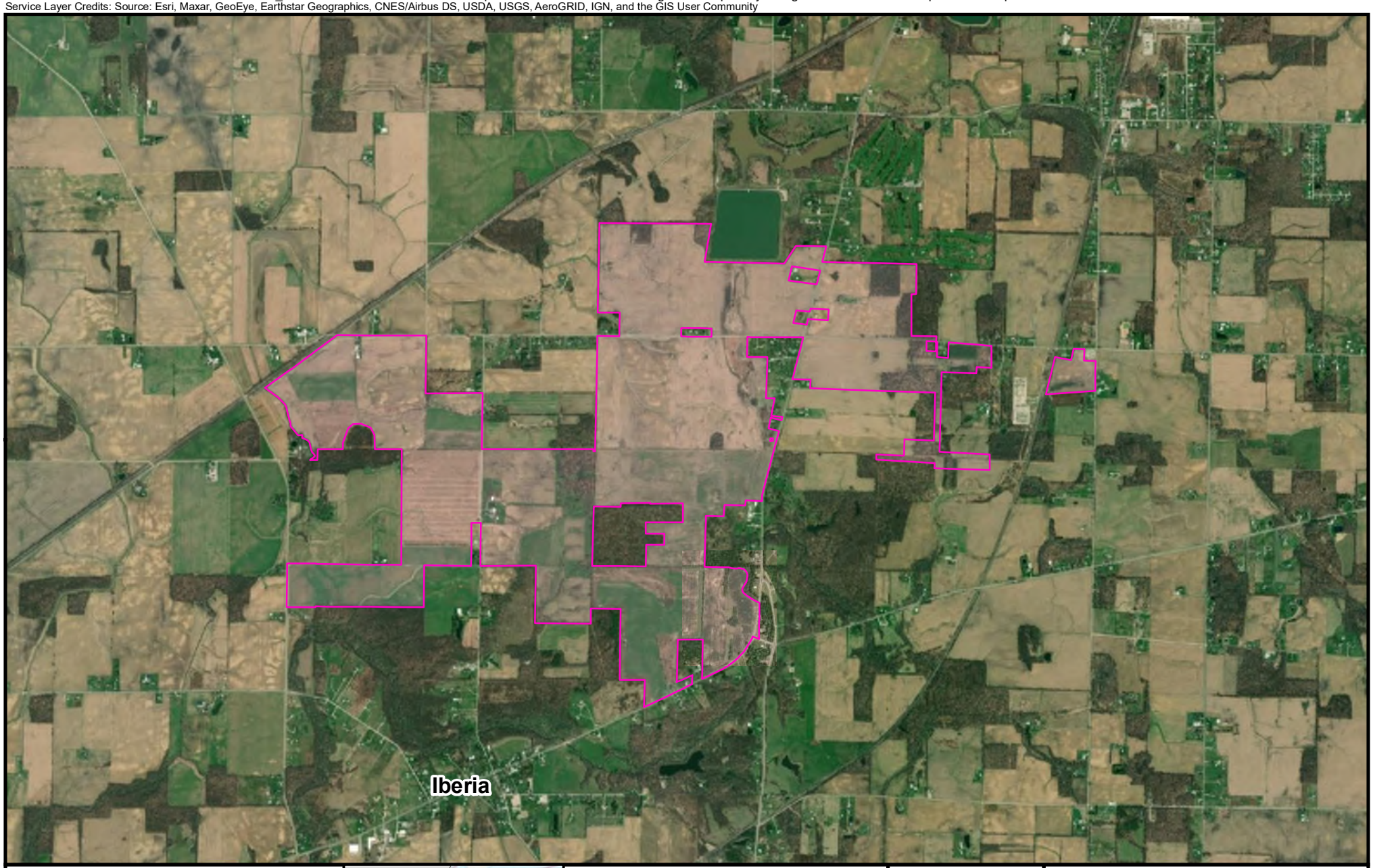
APPENDIX A – FIGURES

Path: Z:\Clients\ENS\BLOSSOMSOLAR\132219_BLOSSOMSLROPSB\Studies\Geospatial\DataFiles\ArcDocs\Ecological Dektop Analysis\Fig1.1 Aerial Overview Map.mxd vakarpov 4/28/2021
Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Project Area Boundary

NORTH

0 0.5 1
Miles

BURNS McDONNELL

Figure A-1.1
Aerial Overview Map
Blossom Solar Project
Morrow and Marion
Counties, Ohio

Source: ESRI; Burns and McDonnell Engineering Company, Inc.

Issued: 4/28/2021

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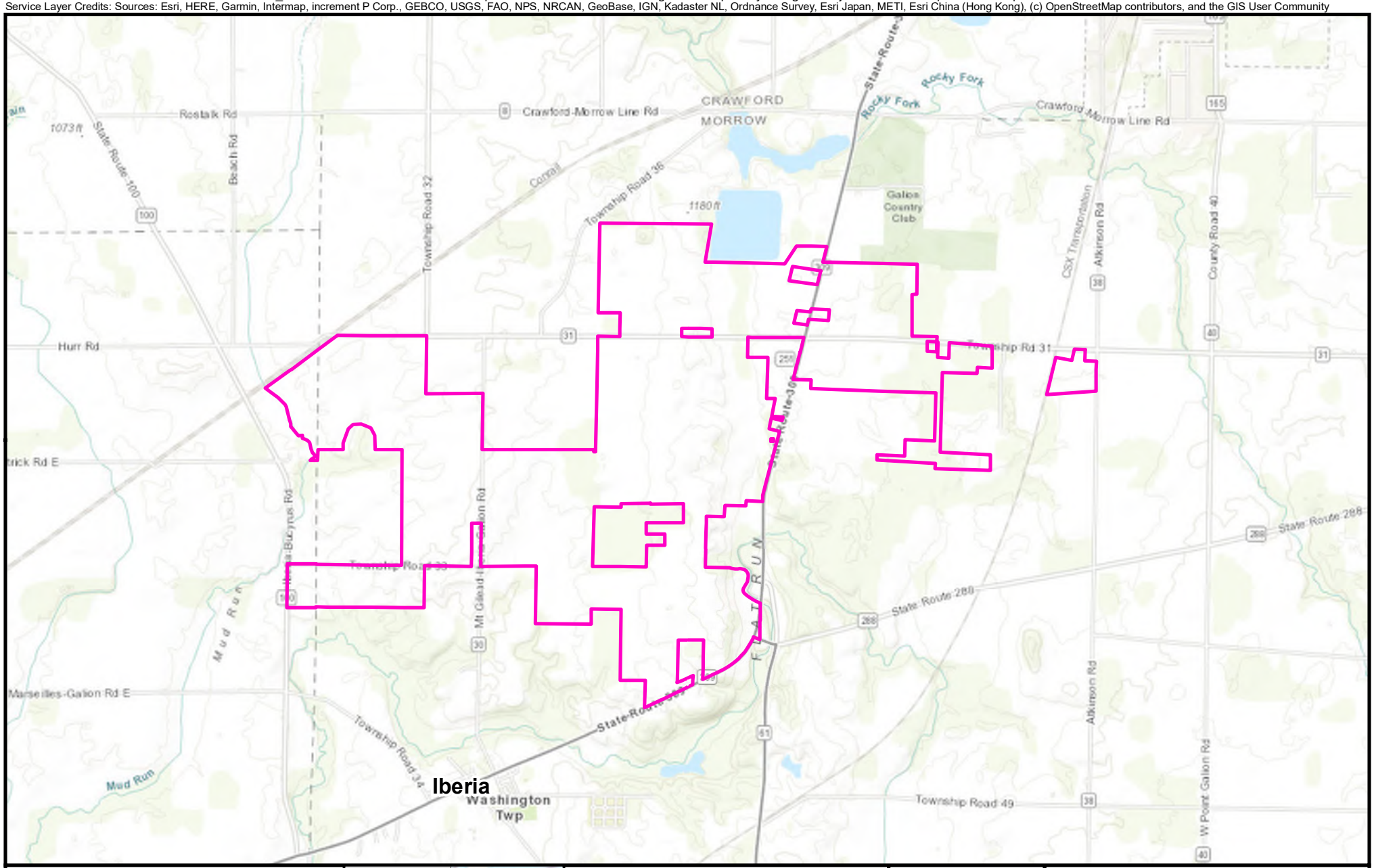
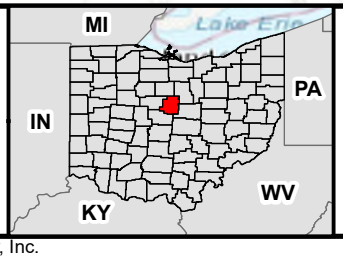
Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



Project Area Boundary



NORTH

0 0.5 1

Miles

BURNS McDONNELL

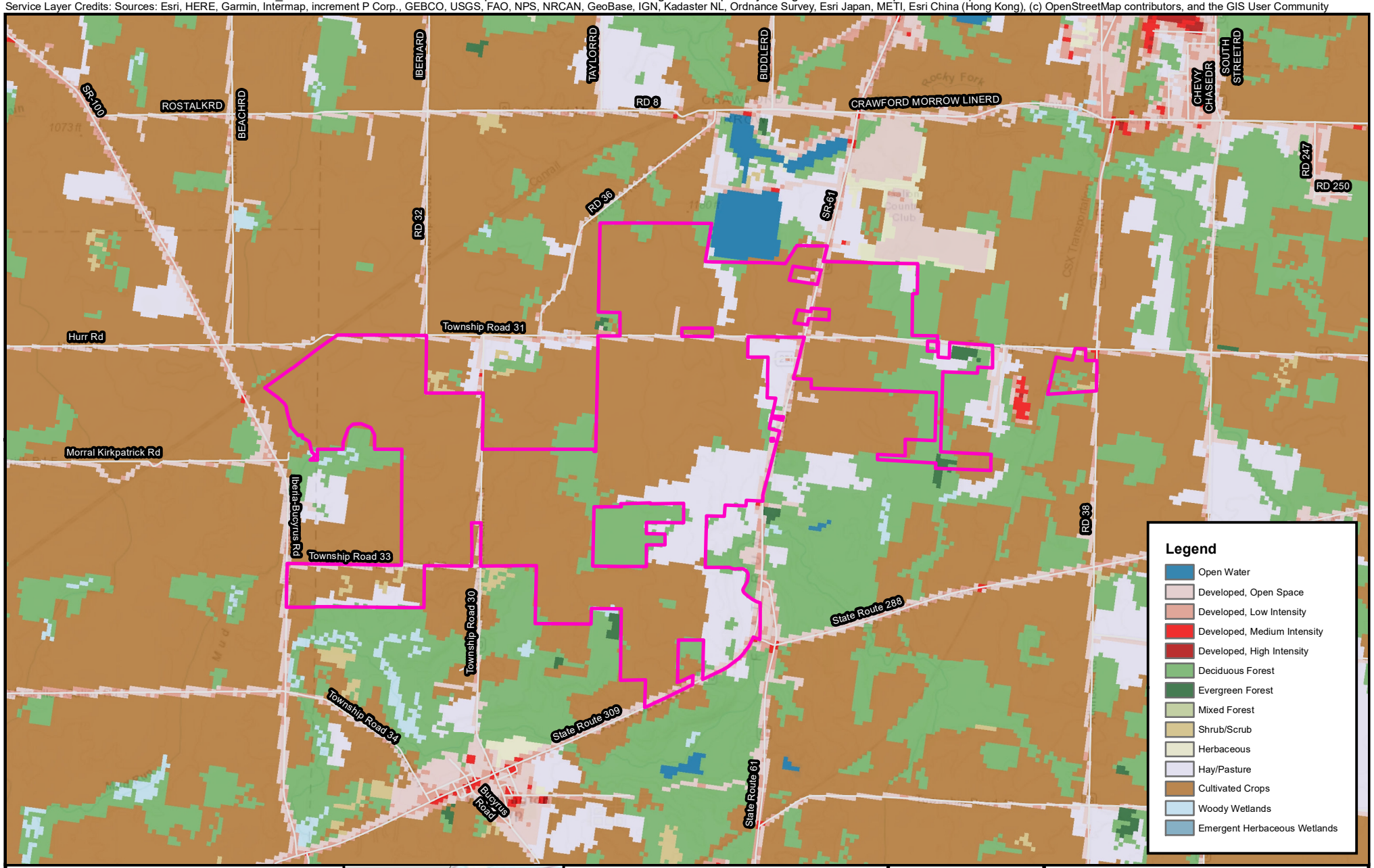
Figure A-1.2
Project Overview Map
Blossom Solar Project
Morrow and Marion
Counties, Ohio

Source: ESRI; Burns and McDonnell Engineering Company, Inc.

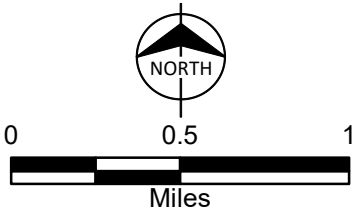
Issued: 4/28/2021

Path: Z:\Clients\ENS\BLOSSOMSOLAR\132219_BLOSSOMSLROPSB\Studies\Geospatial\DataFiles\ArcDocs\Ecological Dektop Analysis\FigA1 Land Use Map.mxd vakarpov 4/28/2021

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



Project Area Boundary



BURNS McDONNELL

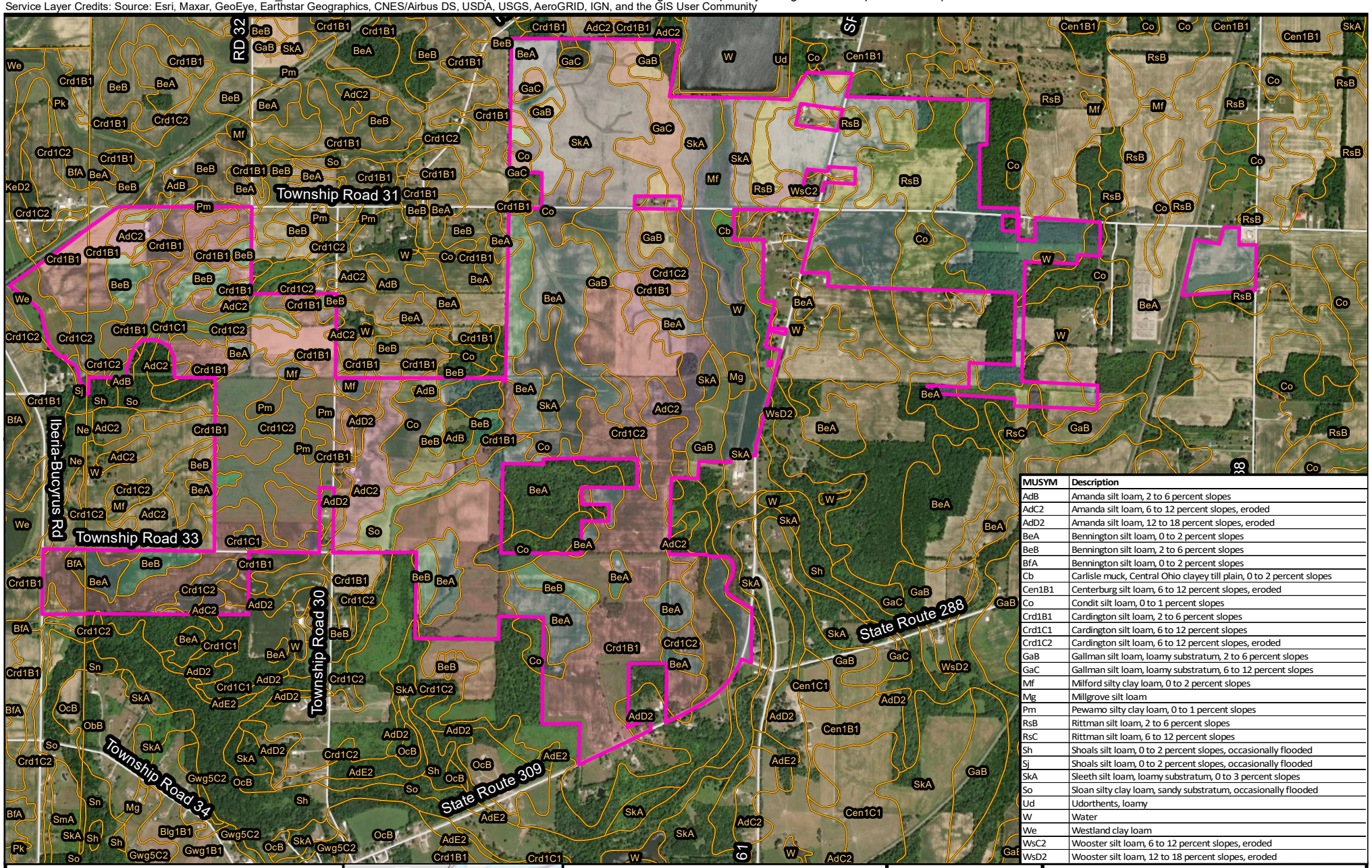
Figure A-2
Land Use Map
Blossom Solar Project
Morrow and Marion
Counties, Ohio

Source: ESRI; MRCS; Burns and McDonnell Engineering Company, Inc.

Issued: 4/28/2021

Path: Z:\Clients\ENS\BLOSSOMSOLAR\132219_BLOSSOMSLROPSB\Studies\Geospatial\DataFiles\ArcDocs\Ecological Dektop Analysis\FigA2 Soils Map.mxd vakarpov 4/28/2021

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



MUSYM	Description
AdB	Amanda silt loam, 2 to 6 percent slopes
AdC2	Amanda silt loam, 6 to 12 percent slopes, eroded
AdD2	Amanda silt loam, 12 to 18 percent slopes, eroded
BeA	Bennington silt loam, 0 to 2 percent slopes
BeB	Bennington silt loam, 2 to 6 percent slopes
BfA	Bennington silt loam, 0 to 2 percent slopes
Cb	Carlisle muck, Central Ohio clayey till plain, 0 to 2 percent slopes
Cen1B1	Centerburg silt loam, 6 to 12 percent slopes, eroded
Co	Condit silt loam, 0 to 1 percent slopes
Crd1B1	Cardington silt loam, 2 to 6 percent slopes
Crd1C1	Cardington silt loam, 6 to 12 percent slopes
Crd1C2	Cardington silt loam, 6 to 12 percent slopes, eroded
GaB	Gallman silt loam, loamy substratum, 2 to 6 percent slopes
GaC	Gallman silt loam, loamy substratum, 6 to 12 percent slopes
Mf	Milford silty clay loam, 0 to 2 percent slopes
Mg	Millgrove silt loam
Pm	Pewamo silty clay loam, 0 to 1 percent slopes
RsB	Rittman silt loam, 2 to 6 percent slopes
RsC	Rittman silt loam, 6 to 12 percent slopes
Sh	Shoals silt loam, 0 to 2 percent slopes, occasionally flooded
Sj	Shoals silt loam, 0 to 2 percent slopes, occasionally flooded
SkA	Sleeth silt loam, loamy substratum, 0 to 3 percent slopes
So	Sloan silty clay loam, sandy substratum, occasionally flooded
Ud	Udorthents, loamy
W	Water
We	Westland clay loam
WsC2	Wooster silt loam, 6 to 12 percent slopes, eroded
WsD2	Wooster silt loam, 12 to 18 percent slopes, eroded

Project Area Boundary

Soil Unit Boundary

NORTH

0 0.25 0.5

Miles

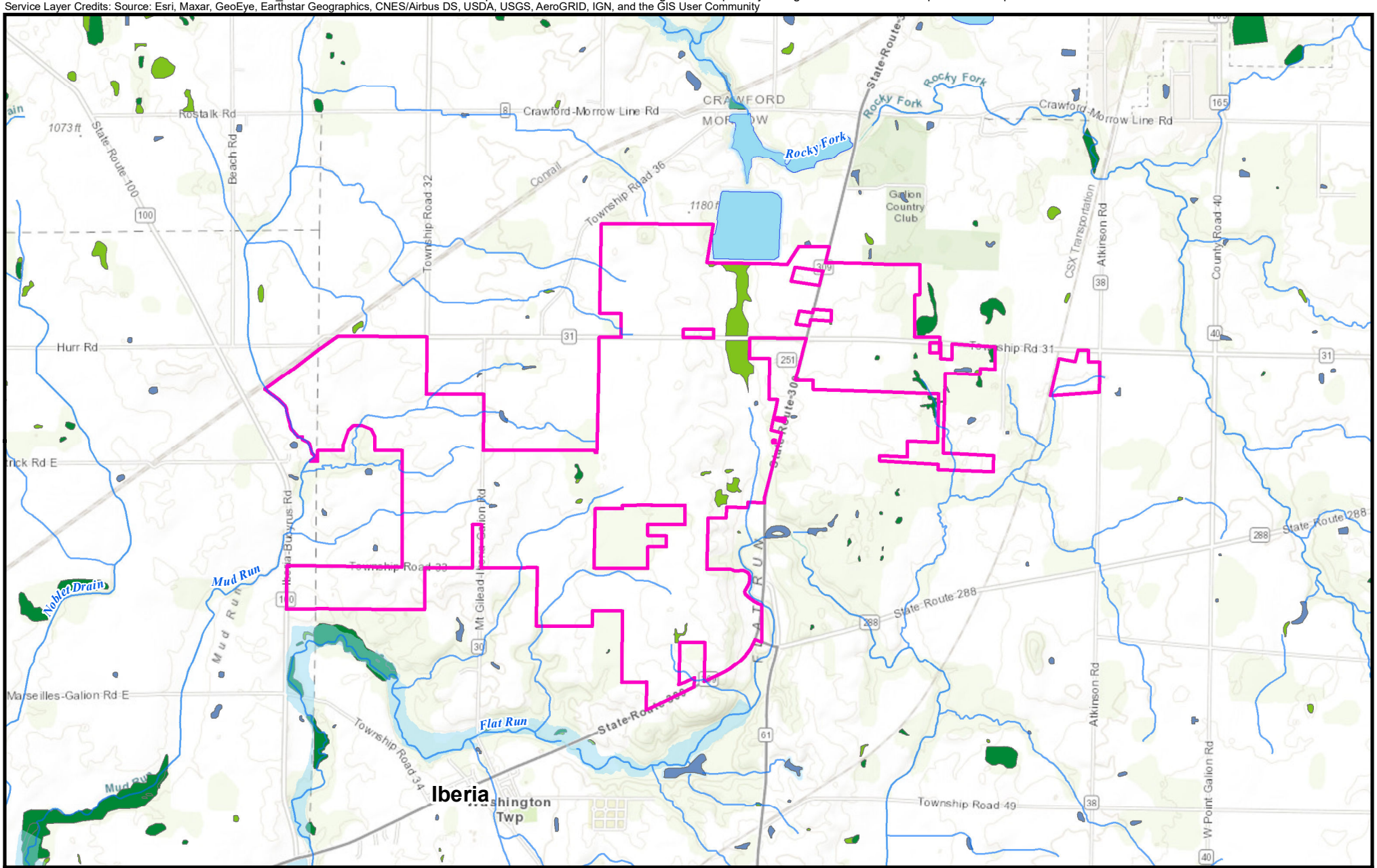
BURNS McDONNELL

Figure A-3
NRCS Soils Map
Blossom Solar Project
Morrow and Marion
Counties, Ohio

Source: ESRI; USGS; NRCS; Burns and McDonnell Engineering Company, Inc.

Issued: 4/28/2021

Path: Z:\Clients\ENS\BLOSSOMSOLAR\132219_BLOSSOMSLROPSB\Studies\Geospatial\DataFiles\ArcDocs\Ecological Dektop Analysis\FigA3 Surface Waters Map.mxd vakarpov 12/8/2021
Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Project Area Boundary
100-Year Floodplain
NWI Freshwater Emergent Wetland
NWI Freshwater Forested/Shrub Wetland
NWI Freshwater Pond
NWI Lake
NHD Stream/River

NORTH

0 0.5 1
Miles

BURNS McDONNELL

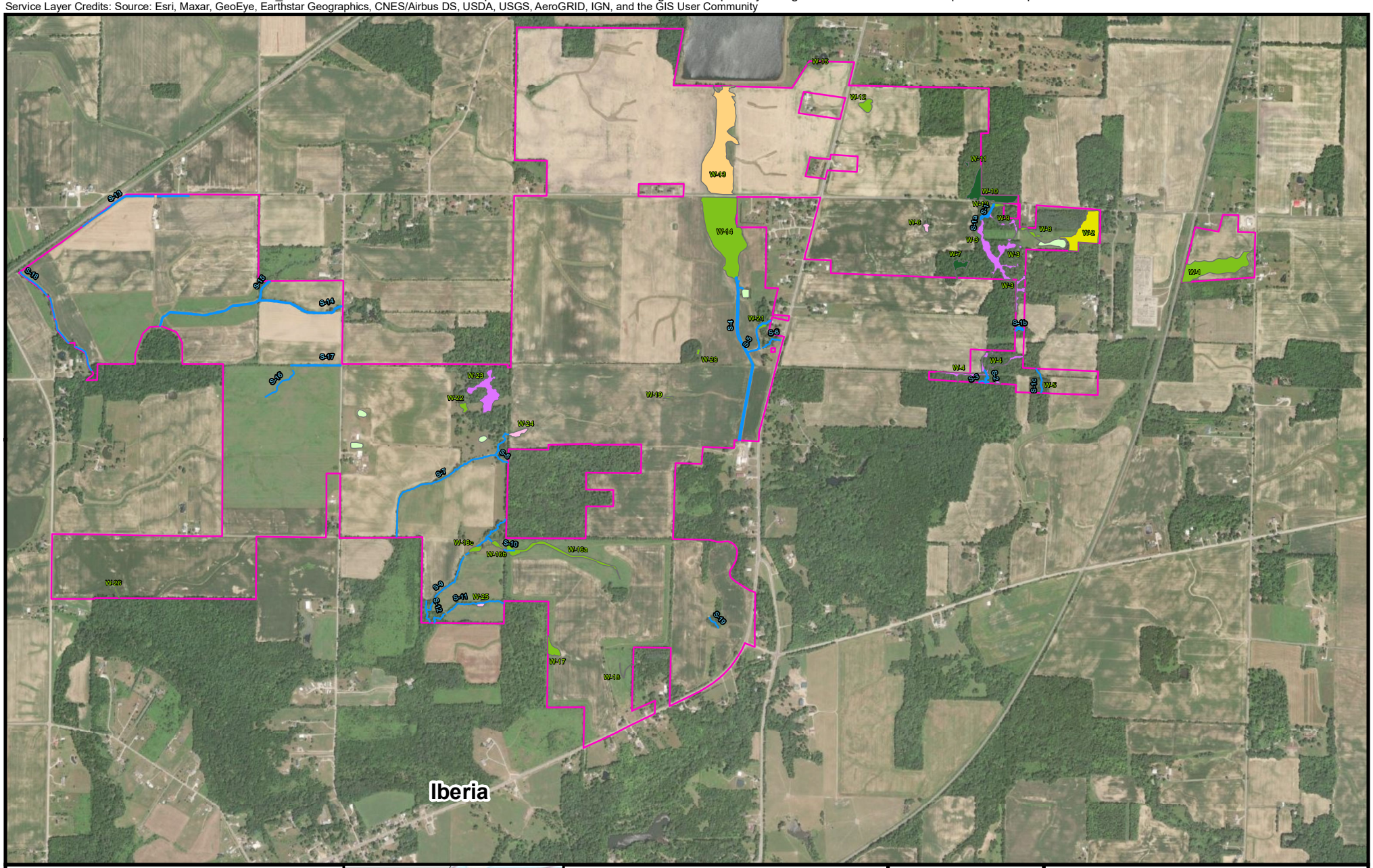
Figure A-4
Surface Waters Map
Blossom Solar Project
Morrow and Marion
Counties, Ohio

Source: ESRI; FEMA; NHD; USFWS; NWI; ODNR; Burns and McDonnell Engineering Company, Inc.

Issued: 12/8/2021

Path: Z:\Clients\ENS\BLOSSOMSOLAR\132219_BLOSSOMSLROPSB\Studies\Geospatial\DataFiles\ArcDocs\Ecological Dektop Analysis\FigA4 Wetland Delineation Map.mxd vakarpov 12/8/2021

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Project Area Boundary

Streams

Wetland Type (W)

Farmed Wetland

MOSAIC

Open Water

PEM

PEM/PFO

PEM/PSS

PFO

NORTH

0 0.25 0.5

Miles

BURNS McDONNELL

Figure A-5
Wetland Delineation Map
Blossom Solar Project
Morrow and Marion
Counties, Ohio

Source: ESRI; FEMA; NHD; USFWS; NWI; ODNR; Burns and McDonnell Engineering Company, Inc.

Issued: 12/8/2021

APPENDIX B – AGENCY COORDINATION

Harrison, Brooke

From: Ohio, FW3 <ohio@fws.gov>
Sent: Tuesday, May 25, 2021 3:57 PM
To: Harrison, Brooke
Cc: nathan.reardon@dnr.state.oh.us; Parsons, Kate; Doug Herling; Keck, Katherine
Subject: Blossom Solar, Morrow and Marion Counties, Ohio
Attachments: Ohio Solar Site Pollinator Habitat Planning and Assessment Form v.9 FINAL_5_3_2018.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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-1404

Dear Ms. Harrison,

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.

POLLINATOR COMMENTS:

The Service is working closely with our partners at Ohio Pollinator Habitat Initiative (OPHI) to create and enhance pollinator habitat at solar power installations. Attached for your use is the Ohio Solar Site Pollinator Habitat Planning and Assessment Form. This form was developed by the OPHI Solar Pollinator Program Advisory Team. We recommend that the areas between the solar panels be planted with legumes and wildflowers (i.e. forbs) that are beneficial to pollinators and other wildlife instead of non-native grass. Pollinators are beneficial to agricultural communities like the project area because they pollinate many varieties of fruits and vegetables. The recommended legumes and forbs are short (low-growing) so as not to cast shadows on the solar panels and would only require one to two mowings a year for maintenance, which should allow the project proponent to minimize maintenance costs. For other areas of the installation where vegetation does not have to be low-growing, alternative pollinator mixes are available with a more diverse array of flowering plants. This perennial vegetation will provide beneficial foraging habitat to songbirds and pollinators

(e.g., monarch butterfly and the federally listed rusty patched bumblebee) while reducing storm water runoff, standing water, and erosion. Native plants can act as host plants for insect larva while flowering plants provide nectar sources for adult butterflies as well as other pollinators such as hummingbirds. Seeds from these plants can also provide food for a wide variety of bird species. Please contact the Ohio Pollinator Habitat Initiative http://www.ophi.info/, and specifically Mike Retterer mretterer@pheasantsforever.org for further information on solar power facility pollinator plantings.

Recommended low-growing grasses and forbs may include:

Little Bluestem	*Schizachyrium scoparium*
Sideoats Grama	*Bouteloua curtipendula*
Alfalfa	*Medicago spp.*
Alsike Clover	*Trifolium hybridum*
Brown-eyed Susan	*Rudbeckia triloba*
Butterfly Milkweed	*Asclepias tuberosa*
Lanceleaf Coreopsis	*Coreopsis lanceolata*
Partridge Pea	*Chamaecrista fasciculata*
Timothy	*Phleum pratense*
Orchardgrass	*Dactylis glomerata*
Crimson Clover	*Trifolium incarnatum*
Ladino or White Clover	*Trifolium repens*

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,

Patrice Ashfield
Field Office Supervisor

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

Ohio Solar Site Pollinator Habitat Planning and Assessment Form

1. Percent of total site planted with native or beneficial introduced flowering plants.

- ☐ 25-50% — 10 points
- ☐ 51-75% — 20 points
- ☐ 76-100% — 30 points

2. Flowering plant diversity in site perimeter & buffer area (species with more than 1% cover).

- ☐ 9-12 species — 5 points
- ☐ 13-16 species — 10 points
- ☐ 17-20 species — 15 points
- ☐ 20+ species — 20 points
- ☐ Site specific Milkweed included @2,000 pls/ac minimum — 10 points

* *If no boxes were selected in questions 1 or 2 then your site does not meet criteria to be considered as an OPHI Solar Pollinator Habitat. However, OPHI can work with you on ways to increase the pollinator score of your site.*

3. Flowering plant seed mixes and plantings to be used.
Native species local to the site are preferred; otherwise species native to Ohio are encouraged.

- ☐ Includes only native plant species — 15 points
- ☐ Includes native and beneficial introduced plant species — 10 points
- ☐ Includes only beneficial introduced plant species — 5 points

4. Flowering plant diversity in rows & under solar array.

- ☐ 4-6 — 5 points
- ☐ 7+ — 10 points
- ☐ Site specific Milkweed included @2,000 pls/ac minimum — 10 points

5. Seasons with at least 3 blooming species. Check all that apply.

- ☐ Spring *(April – May)* — 5 points
- ☐ Summer *(June – August)* — 5 points
- ☐ Fall *(September – October)* — 5 points

6. Available habitat components within ¼ mile of site. Check all that apply.

- ☐ Native grasses — 2 points
- ☐ Trees and shrubs — 2 points
- ☐ Forest edge habitat — 2 points
- ☐ Cavity nesting sites — 2 points
- ☐ Clean perennial water sources — 2 points

7. Planned vegetative buffers adjacent to the solar site. Check all that apply.

- ☐ Site has planned buffer adjacent to solar site — 5 points
- ☐ Buffer is at least 30 feet wide as measured from array fencing or edge of flower plantings — 5 points
- ☐ Buffer is at least 50 feet wide as measured from array fencing or edge of flower plantings — 10 points
- ☐ Buffer includes flowering Shrubs/trees and other shrubs/trees that provide food for wildlife — 5 points

8. Habitat site preparation prior to implementation.

- ☐ Measures taken to control weeds and invasive species prior to seeding/planting. — 10 points
- ☐ Appropriate soil preparation done to reduce erosion And enhance germination/growth — 5 points
- ☐ None — -10 points

9. Planned management practices for areas designated as part of the pollinator habitat site. Check all that apply.

- ☐ Detailed establishment and management plan developed for site — 10 points
- ☐ Mowing Follows OPHI mowing schedule for monarchs each year — 5 points
- ☐ Mowing is staggered over a 2 week period — 5 points
- ☐ Signage indicating site is wildlife & pollinator-friendly — 5 points
- ☐ Creation of habitat features (e.g. boxes, pass-through tunnels, bee hotels) — 5 points
- ☐ Long-term monitoring plan developed that includes re-certification as Solar Site Pollinator Habitat — 10 points

10. Insecticide risk. Check if applicable.
Communication with adjacent landowners about the project and possible impacts of their insecticide use is critical

- ☐ Site is adjacent to land (within 120 ft.) where insecticides are used — -20 points
- ☐ Planned on-site insecticide use (including pre-treated seeds/plants — -40 points

Total Points: 0 _____

Provides High Quality Pollinator Habitat	**> 85**
Meets OPHI Solar Pollinator Habitat Standards	**70-84**

Site Owner/Operator:

Project Location:

Project Size (acres):

Planned Source of Seeds:

Planned Seeding Date:

Habitat & Vegetation Consultant:

Refer to www.ophi.info for more information regarding solar pollinator habitat development.

Version 1 - March 2018
Developed by the OPHI Solar Pollinator Program Advisory Team

Ohio Pollinator Habitat Initiative

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR | MARY MERTZ, DIRECTOR

Office of Real Estate
John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
Fax: (614) 267-4764

June 24, 2021

Brooke Harrison
Burns & McDonnell
530 W. Spring St, Suite 200
Columbus, Ohio 43215

Re: 21-0486; Blossom Solar Project

Project: The proposed project involves the construction of a solar facility.

Location: The proposed project is located in the City of Cincinnati, Hamilton County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do 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.

Natural Heritage Database: The Natural Heritage Database has no records at or within a one-mile radius of the project area.

A review of the Ohio Natural Heritage Database indicates there are no other records of state endangered or threatened plants or animals within the project area. There are also no records of state potentially threatened plants, special interest or species of concern animals, or any federally listed species. In addition, we are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests, national wildlife refuges, or other protected natural areas within the project area. The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The Division of Wildlife is working closely with our partners at Ohio Pollinator Habitat Initiative (OPHI) to create and enhance pollinator habitat at solar power installations. The OPHI Solar Pollinator Program Advisory Team has developed the Ohio Solar Site Pollinator Habitat Planning and Assessment Form and is available for your use. The form can be found at the following: http://nebula.wsimg.com/7cf0240c398d5819e3e6ff011f0ba456?AccessKeyId=570E4FC7FCD2ED2F0C1A&disposition=0&alloworigin=1. We recommend that the areas between and around the solar panels be planted with legumes and wildflowers (i.e. forbs) that are beneficial to pollinators and other wildlife and reduce use of non-native grass and gravel. The recommended legumes and forbs listed below are low-growing so as not to cast shadows on the solar panels and would only require one to two mowings a year for maintenance, which should minimize maintenance costs. For other areas of the installation where vegetation does not have to be low-growing, alternative pollinator mixes are available with a more diverse array of flowering plants. This perennial vegetation will provide beneficial foraging habitat to songbirds and pollinators while reducing storm water runoff, standing water, and erosion. Please contact the Ohio Pollinator Habitat Initiative http://www.ophi.info/, and specifically Mike Retterer mretterer@pheasantsforever.org for further information on solar power facility pollinator plantings.

Recommended low-growing grasses and forbs may include:

Little Bluestem	*Schizachyrium scoparium*
Sideoats Grama	*Bouteloua curtipendula*
Alfalfa	*Medicago spp.*
Alsike Clover	*Trifolium hybridum*
Brown-eyed Susan	*Rudbeckia triloba*
Butterfly Milkweed	*Asclepias tuberosa*
Lanceleaf Coreopsis	*Coreopsis lanceolata*
Partridge Pea	*Chamaecrista fasciculata*
Timothy	*Phleum pratense*
Orchardgrass	*Dactylis glomerata*
Crimson Clover	*Trifolium incarnatum*
Ladino or White Clover	*Trifolium repens*

The entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these species of bats predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. If trees are present within the project area, and trees must be cut, the DOW recommends cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH $\geq$ 20 if possible. If trees are present within the project area, and trees must be cut during the summer months, the DOW recommends a mist net survey or acoustic survey be conducted from June 1 through August 15, prior to any cutting. Mist net and acoustic surveys should be conducted in accordance with the most recent version of the "*OHIO DIVISION OF WILDLIFE GUIDANCE FOR BAT SURVEYS AND TREE*

CLEARING". If state listed bats are documented, DOW recommends cutting only occur from October 1 through March 31, however, limited summer tree cutting may be acceptable after consultation with DOW (contact Sarah Stankavich, sarah.stankavich@dnr.state.oh.us).

The DOW also recommends that a desktop habitat assessment, followed by a field assessment if needed, is conducted to determine if there are potential hibernaculum(a) present within the project area. Information about how to conduct habitat assessments can be found in the current USFWS "*Range-wide Indiana Bat Survey Guidelines*." If a habitat assessment finds that potential hibernacula are present within 0.25 miles of the project area, please send this information to Sarah Stankavich, sarah.stankavich@dnr.state.oh.us for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the Iowa darter *(Etheostoma exile),* a state endangered fish, and the lake chubsucker (*Erimyzon sucetta*), a state threatened fish. The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the sandhill crane (*Grus canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds, they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Geological Survey: The Division of Geological Survey has the following comments:

Physiographic Region
The proposed project area is in Washington and North Bloomfield townships, Morrow County and Tully Township, Marion County. This area is in the Central Ohio Clayey Till Plain physiographic region. This region is characterized by well-defined end moraines as well as flat-lying ground moraines. Intermorainal lake basins filled with silt, clay, and till are present. There are few large streams and limited sand and gravel outwash. A high-lime Wisconsinan-age till covers Lower Paleozoic-age carbonate rocks and shales (Ohio Department of Natural Resources, Division of Geological Survey, 1998).

Surficial/Glacial Geology
The project area lies within the glaciated margin of the state and includes several Wisconsinan-age glacial features. End moraine deposits made up of clayey till and hummocky ridges cover most of the project area. A flatter ground moraine deposit covers the western portion of the project area and a lacustrine clay deposit is mapped in the northern portion of the project area. Glacial outwash is mapped along Flat Run and Mud Run (Pavey et al, 1999). Glacial drift throughout most of the study area is between 0 and 88 feet thick. Drift is thickest in the southwest and thinnest to the west and southeast of the project area, possibly being absent in some places (Powers and Swinford, 2004).

Bedrock Geology
The uppermost bedrock unit in the project area is the Sunbury Shale. This unit is Mississippian-age and consists of black to brownish black carbonaceous shale with very thin laminae. This unit underlies much of the eastern portion of the project area. Underlying the Sunbury Shale is the Mississippian-age Berea Sandstone and Bedford Shale Undivided. Bedford shale in this unit consists of gray to brown shale and interbedded siltstone and sandstone. Bedding may be planar to lenticular. Ripple marks may be present in siltstone. Berea Sandstone in this unit consists of brown to weathered reddish-brown sandstone with minor shale beds present. This unit underlies much of the western portion of the project area. Bedrock may be exposed in outcrops and roadcuts within the boundary of the project area (Slucher et al, 2006).

Oil, Gas and Mining
ODNR has record of 31 oil and gas wells within one mile of the proposed project area. Most of these wells are listed as plugged, dry, or were never drilled with expired permits (Ohio Department of Natural Resources, Division of Oil and Gas, Ohio Oil and Gas Wells Locator).

ODNR does not have record of any mining operations within the project area. The nearest mine to the project area is an active shale quarry operated by Glen-Gery Corporation. This mine is located approximately 1.2 miles south of the project area (Ohio Department of Natural Resources, Division of Mineral Resources, Mines of Ohio).

Seismic Activity
Several small earthquakes have historically been recorded in the region. The three events closest to the site are listed in the chart below (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Earthquake Epicenters):

Date	Magnitude	Distance to Site Boundary	County	Township
January 12, 1995	3.3	9.3 miles	Richland	Springfield
February 17, 1927	3.1	15.4 miles	Richland	Washington
February 17, 1927	2.5	16.3 miles	Richland	Washington

Soils
According to the USDA Web Soil Survey, the project area consists primarily of soils derived from till, loess, outwash and alluvium. Centerburg, Bennington, Sleeth, Amanda, Cardington and Rittman are the most common soil series found within the boundaries of the project area. Together, these soils make up over 80% of the project area (USDA Web Soil Survey).

There is a low to moderate risk of shrink-swell potential in these soils. Other limiting factors include poor drainage and ponding in some soils. Slope remains relatively flat, with slope seldom exceeding a 12% grade. Slope may be higher along streambanks (USDA Web Soil Survey).

Groundwater
Groundwater resources vary throughout the project area. Wells developed in the Sunbury Shale have an expected yield of less than 5 gallons per minute. *Groundwater Resources of Morrow County* lists this area as having an expected yield of less than 2 gallons per minute and notes that dry wells are common. Wells developed in the Berea Sandstone and Bedford Shale Undivided have an expected yield of 5 to 25 gallons per minute. *Groundwater Resources of Morrow County* lists this area as having an expected yield of 10 to 25 gallons per minute and notes that hydrogen sulfide is often found in the Berea Sandstone (Kostelnick, 1981 and Ohio Department of Natural Resources, Division of Water, Bedrock Aquifer Map, 2000). Wells developed in glacial material are likely to yield up to 25 gallons per minute. Unconsolidated aquifers in the area include the Galion Ground Moraine Aquifer, the Galion Thin Upland Aquifer, the Powell Thin Upland

Aquifer, and the Powell End Moraine Aquifer. These aquifers have an expected yield of 5 to 25 gallons per minute, except for the Galion Thin Upland Aquifer and the Powell Thin Upland Aquifer which have a yield of less than 5 gallons per minute. Higher groundwater yields typically reflect larger diameter, properly developed and screened wells (Ohio Department of Natural Resources, Division of Water, Statewide Unconsolidated Aquifer Map, 2000).

ODNR has record of 233 water wells drilled within one mile of the project area. These wells range in depth from 19 to 259 feet deep, with an average depth of 80.1 feet. The most common aquifer listed is shale or sandstone. There are 80 shale wells and 71 sandstone wells. Unconsolidated sand and gravel is used as the aquifer in an additional 29 wells. A sustainable yield of 2 to 40 gallons per minute is expected from wells drilled in this area based on well log records. The average sustainable yield from these records within one mile was 11.5 gallons per minute. This is based on records from 24 wells within one mile of the project area that contain sustainable yield data (Ohio Department of Natural Resources, Division of Water, Ohio Water Wells).

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at Sarah.Tebbe@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

References

Kostelnick, R. (1981). *Groundwater Resources of Morrow County*, Ohio Department of Natural Resources, Division of Geological Survey, map.

Ohio Department of Natural Resources, Division of Geological Survey, *Ohio Earthquake Epicenters,* online interactive map, https://gis.ohiodnr.gov/MapViewer/?config=earthquakes

Ohio Department of Natural Resources, Division of Geological Survey, (1998). *Physiographic Regions of Ohio.* Ohio Department of Natural Resources, Ohio Department of Natural Resources, Division of Geological Survey, map with text, 2 p., scale 1:2,100,000.

Ohio Department of Natural Resources, Division of Mineral Resources, *Mines of Ohio,* online interactive map, https://gis.ohiodnr.gov/MapViewer/?config=OhioMines.

Ohio Department of Natural Resources, Division of Oil and Gas, *Ohio Oil and Gas Wells Locator*, online interactive map, https://gis.ohiodnr.gov/MapViewer/?config=oilgaswells.

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Ohio Department of Natural Resources, Division of Water, (2000). *Statewide Bedrock Aquifer Map*, GIS coverage.

Ohio Department of Natural Resources, Division of Water, (2000). *Statewide Unconsolidated Aquifer Map*, GIS coverage.

Pavey, R., Goldthwait, R., Brockman, C.S. Hull, D., Swinford, E.M., and Van Horn, R. (1999). *Quaternary Geology of Ohio,* Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:500,000.

Powers, D.M., and Swinford, E.M. (2004). *Shaded drift-thickness map of Ohio*, Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:500,000

Slucher, E., Swinford, E., Larsen, G., Schumacher, G., Shrake, D., Rice, C., Caudill, M., Rea, R. and Powers, D. (2006). *Bedrock Geologic Map of Ohio,* Ohio Department of Natural Resources, Division of Geological Survey, map, scale 1:500,000.

USDA Web Soil Survey, (Last modified 2019). *Web Soil Survey Interactive Map,* United States Department of Agriculture, National Resources Conservation Service, online interactive map, https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

APPENDIX C – IMPACT TABLES

Table 10. Proposed Impacts to Wetlands within Blossom Solar Project Area.

Wetland Number	Collection Lines			
	Temporary Impacts		Permanent Impacts	
	Square Feet	Acre	Square Feet	Acre
W-1	0	0	n/a	n/a
W-2	0	0	n/a	n/a
W-3	0	0	n/a	n/a
W-4	0	0	n/a	n/a
W-5	0	0	n/a	n/a
W-6	0	0	n/a	n/a
W-7	0	0	n/a	n/a
W-8	0	0	n/a	n/a
W-9	0	0	n/a	n/a
W-10	0	0	n/a	n/a
W-11	0	0	n/a	n/a
W-12	0	0	n/a	n/a
W-13	6,132	0.14	n/a	n/a
W-14	0	0	n/a	n/a
W-15	0	0	n/a	n/a
W-16	0	0	n/a	n/a
W-17	0	0	n/a	n/a
W-18	0	0	n/a	n/a
W-19	0	0	n/a	n/a
W-20	0	0	n/a	n/a
W-21	0	0	n/a	n/a
W-22	0	0	n/a	n/a
W-23	0	0	n/a	n/a
W-24	0	0	n/a	n/a
W-25	0	0	n/a	n/a
W-26	0	0	n/a	n/a
Constructed Pond 1	0	0	n/a	n/a
Constructed Pond 2	0	0	n/a	n/a
Constructed Pond 3	0	0	n/a	n/a
Constructed Pond 4	0	0	n/a	n/a
Constructed Pond 5	0	0	n/a	n/a
Total:	**6,132**	**0.14**	**0**	**0**

Table 11. Proposed Impacts to Streams within Blossom Solar Project Area.

Stream Number	Collection Lines				Access Road			
	Temporary Impacts		Permanent Impacts		Temporary Impacts		Permanent Impacts	
	Square Feet	Acre	Square Feet	Acre	Square Feet	Acre	Square Feet	Acre
S-1a	0	0	n/a	n/a	0	0	0	0
S-1b	0	0	n/a	n/a	0	0	0	0
S-1c	0	0	n/a	n/a	0	0	0	0
S-2	0	0	n/a	n/a	0	0	0	0
S-3	0	0	n/a	n/a	0	0	0	0
S-4	0	0	n/a	n/a	0	0	0	0
S-5	0	0	n/a	n/a	0	0	0	0
S-6	0	0	n/a	n/a	0	0	0	0
S-7	1,035	0.02	n/a	n/a	1,260	0.03	1,005	0.02
S-8	0	0	n/a	n/a	0	0	0	0
S-9	1,075	0.02	n/a	n/a	1,365	0.03	1,030	0.02
S-10	0	0	n/a	n/a	0	0	0	0
S-11	0	0	n/a	n/a	0	0	0	0
S-12	0	0	n/a	n/a	0	0	0	0
S-13	0	0	n/a	n/a	0	0	0	0
S-14	570	0.01	n/a	n/a	290	0.007	230	0.004
S-15	0	0	n/a	n/a	0	0	0	0
S-16	0	0	n/a	n/a	490	0.01	285	0.006
S-17	217	0.005	n/a	n/a	0	0	0	0
S-18	0	0	n/a	n/a	0	0	0	0
S-19	0	0	n/a	n/a	0	0	0	0
Total:	**2,897**	**0.06**	**0**	**0**	**3,405**	**0.08**	**2,550**	**0.05**

APPENDIX D – USACE JURISDICTIONAL DETERMINATION LETTER

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

REPLY TO
ATTENTION OF:

January 14, 2021

Regulatory Division
North Branch
LRH-2021-944-SCR

APPROVED AND PRELIMINARY JURISDICTIONAL DETERMINATION

Mr. Doug Herling
Blossom Solar, LLC
1105 Navasota Street
Austin, Texas 78702

Dear Mr. Herling:

I refer to the *Investigation of Waters of the United States, Blossom Solar Project, Marion County, Ohio* dated 22 October 2021, and submitted on your behalf by Burns & McDonnell. You have requested an Approved Jurisdictional Determination (JD) for the potentially non-jurisdictional features and a Preliminary JD for the potentially jurisdictional aquatic resources located within the 1,653-acre JD review area. The JD review area is located north of State Route 309, east of Iberia Bucyrus Road, and south of Crawford-Morrow Line Road, in the City of Galion, Marion County, Ohio (40.6902 latitude, -82.8283 longitude). Your request has been assigned the following file number: LRH-2021-944-SCR. Please reference this file number on all future correspondence related to this JD request.

The United States Army Corps of Engineers' (Corps) authority to regulate waters of the United States is based 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 a Department of the Army (DA) permit be obtained prior to the discharge of dredged or fill material into waters of the United States, including wetlands. Section 10 of the Rivers and Harbors Act of 1899 requires a DA permit be obtained for any work in, on, over or under navigable water.

Preliminary Jurisdictional Determination

Based upon a review of the submitted report, this office has determined that approximately 19 streams totaling 21,225 linear feet and 50.23 acres of 26 wetlands are located within the JD review area and may be waters of the United States in accordance with the Regulatory Guidance Letter for JDs issued by the Corps on October 31, 2016 (Regulatory Guidance Letter No. 16-01). As indicated in the guidance, this Preliminary JD is non-binding and cannot be appealed (33 CFR 331.2) and only provides a written indication that waters of the United States, 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 mentioned above. However, for the purposes of the determination of impacts, compensatory mitigation, and other resource protection measures for activities that require authorization from this office, these aquatic resources will be evaluated as if they are waters of the United States.

Enclosed please find a copy of the Preliminary JD. If you agree with the findings of this Preliminary JD and understand your options regarding the same, please sign and date a copy of the Preliminary JD form and return it to this office within 30 days of receipt of this letter. You should submit the signed copy via email or to the following address:

United States Army Corps of Engineers
Huntington District
Attn: North Branch
502 Eighth Street
Huntington, West Virginia 25701

Approved Jurisdictional Determination

Our December 2, 2008 headquarters guidance entitled *Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in* Rapanos v. United States & Carabell v. United States was followed in the final verification of Section 404 jurisdiction. Based on a review of the of the submitted report the approximate 1,653-acre approved JD review area contains five (5) ponds (Ponds 1-5) totaling 1.51 acres. Ponds 1-5 appear to be man-made, excavated water features that are in uplands, not created by impounding a jurisdictional stream, do not have a surface water connection to a traditional navigable water, and do not support wetland vegetation. Ponds 1-5 are not considered waters of the United States and is not subject to regulation under Section 404.

This jurisdictional verification is valid for a period of five (5) years from the date of this letter unless new information warrants revision of the delineation prior to the expiration date. This letter contains an AJD for the subject site. If you object to this determination, you may request an administrative appeal under Corps regulations at 33 CFR 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the Great Lakes and Ohio River Division Office at the following address:

Appeal Review Officer
United States Army Corps of Engineers
Great Lakes and Ohio River Division
550 Main Street, Room 10-714
Cincinnati, Ohio 45202-3222
Phone: (513) 684-7261
Fax: (513) 684-2460

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. **It is not necessary to submit an RFA form to the Division Office if you do not object to the determination in this letter.**

This determination has been conducted to identify the limits of the Corps' Section 404 jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are United States Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.

A copy of this letter will be provided to your agent, Ms. Brooke Harrison with Burns and McDonnell. If you have any questions concerning the above information, please contact Mr. Cecil Cox of the North Branch at 304-399-6933, by mail at the above address or by email at cecil.m.cox@usace.army.mil.

Sincerely,

Andrew J. Wendt
Regulatory Project Manager
North Branch

Enclosure(s)

CREATE AMAZING.

Burns & McDonnell
530 West Spring Street, Suite 200
Columbus, Ohio 43215
O 614-453-7800
www.burnsmcd.com

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Case No(s). 22-0151-EL-BGN

Summary: Application Application Exhibit Q (Ecological Report) electronically filed by Mr. Michael J. Settineri on behalf of Blossom Solar, LLC