

23. U.S. Fish & Wildlife Service (USFWS) – TNT Howard LLC – 8/12/26

We obtained an Official Species List via the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool. The Project is comprised of an agricultural farmland, bordered by tree lines to the North and East and then homes in a subdivision. To the West and South of the solar project exists farmland. Approximately 300 ft to the South lies a treed creek followed by more farmland.

The IPaC identified the potential for 6 endangered species, the Bald and Golden Eagles, and several migratory birds, as well as an experimental (non-essential) population of whooping crane (*Grus americana*) and the Eastern Prairie Fringed Orchid (*Platanthera leucophaea*) as potentially occurring within the Project area. There are no critical habitats at this location, however, we must still determine if there are potential effects on the above listed species.

A reintroduced, non-essential experimental population of whooping cranes (*Grus americana*) occupies part of the species' historical range in Wisconsin and may occasionally traverse Illinois during seasonal migrations in the spring and fall. While the species primarily utilizes wetland habitats for foraging and roosting, it may also opportunistically feed in agricultural landscapes, including croplands, hayfields, and pastures. Portions of the Project Area containing cropland could offer temporary foraging habitat during migration. However, the presence of whooping cranes within the Project Area is expected to be infrequent and transitory. Under the Endangered Species Act (ESA), this experimental population is considered non-essential to the continued existence of the species and, for private land actions, is treated as a proposed species. As such, formal consultation under Section 7 of the ESA is not required.

The Bald and Golden Eagle Protection Act (BGEPA) (16 U.S.C. 668 et seq.) prohibits the take, possession, sale, purchase, barter, offer to sell, transport, or export of bald and golden eagles, including disturbance of individuals, nests, or eggs. Based on a site-specific field assessment and the results of the Illinois Department of Natural Resources' Ecological Compliance Assessment Tool (EcoCAT), no suitable nesting habitat for bald or golden eagles was identified within the Project Area. Additionally, no eagle nests are documented within or immediately adjacent to the site. As a result, adverse impacts to nesting bald eagles or their habitats are not anticipated as a result of the proposed Project.

According to the USFWS Information for Planning and Consultation (IPaC) resource list, 17 migratory bird species listed as Birds of Conservation Concern (BCC) may occur within the study area. The Project site itself consists of active farmland, which does not constitute suitable habitat for most BCC species. However, surrounding features such as riparian corridors, trees, and shrublands may provide nesting or foraging habitat. Therefore, the Project is anticipated to have no direct or indirect effect, and no further consultation under the Endangered Species Act is required.

The Eastern Prairie Fringed Orchid is a federally and state-listed threatened species that typically occurs in high-quality wet prairie ecosystems, sedge meadows, and calcareous fens. A review of site conditions and available ecological data indicates that these habitat types are not present within the Project Area. As such, the potential for occurrence of *Platanthera leucophaea* is low, and adverse impacts to this species as a result of the proposed Project are unlikely.

Conclusion

The Project Area and its immediate surroundings are actively farmed and do not contain suitable habitat for federally listed species. Additionally, sufficient undisturbed habitat exists in the broader landscape to support wildlife movement and ecological functions. As a result, adverse impacts associated with the proposed solar development are not anticipated. Based on the current scope and findings, coordination with the U.S. Fish and Wildlife Service (USFWS) is considered complete. Further consultation is not required unless there are substantive changes to the Project scope or updates regarding the status of federally listed species.

Additional information on endangered species data is provided below:

Mammals



Northern Long-eared Bat



Tricolored Bat

Northern Long-eared Bat (*Myotis septentrionalis*)

The northern long-eared bat (*Myotis septentrionalis*) is a medium-sized species, measuring approximately 3.0 to 3.7 inches in body length with a wingspan ranging from 9 to 10 inches. It is distinguished by relatively long ears compared to other species within the *Myotis* genus, which are generally characterized by smaller ears (the genus name *Myotis* translates to "mouse-eared"). The northern long-eared bat has a broad distribution across much of the eastern and north-central United States, extending into all Canadian provinces from the Atlantic coast to the southern Northwest Territories and eastern British Columbia. The species' known range encompasses 37 U.S. states.

No critical habitat has been designated for this species. However, minimal suitable habitat may exist within the study area due to the presence of forested corridors located along the northern boundary. To avoid potential impacts to sensitive species that may utilize these wooded areas, any tree trimming or removal activities should be conducted between October 1 and March 31, outside of the typical breeding season.

Tricolored Bat (*Perimyotis subflavus*)

The tricolored bat (*Perimyotis subflavus*) is a small insectivorous species recognized by its distinct tricolored fur, which often appears yellowish to orange in coloration. Historically common, this species has a broad range across the eastern and central United States, as well as portions of southern Canada, Mexico, and Central America. During winter months, tricolored bats typically roost in caves and abandoned mines. However, in the southern United States where such structures are limited, they may use alternative roosts such as road-associated culverts, where they enter brief torpor and actively forage on warm nights. In spring, summer, and fall, the species roosts in forested habitats, primarily among the foliage of live or recently dead deciduous hardwood trees. They may also be found in Spanish moss, pine trees, and occasionally within human-made structures.

No critical habitat has been designated for this species. However, minimal suitable habitat may be present within the study area due to the presence of forested corridors located along the northern boundary. To avoid potential impacts to sensitive species that may utilize these habitats, any tree trimming or removal should be conducted between October 1 and March 31, outside of the typical breeding and roosting seasons.

Birds



Whooping Crane (*Grus americana*)

The Project site lies within the potential migratory corridor of the whooping crane (*Grus americana*), which travels between breeding grounds in Wisconsin and wintering areas in Florida. The area proposed for development is currently used for row crop agriculture, which does not constitute preferred stopover or landing habitat for migrating whooping cranes. While the proposed solar installation will alter the existing land use, it is not expected to enhance or diminish the site's suitability for migratory stopover. Therefore, the Project is anticipated to have no direct or indirect effect on whooping cranes, and no further consultation under the Endangered Species Act is required.



Bald and Golden Eagles

Bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) are federally protected under both the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA). These laws prohibit the take, possession, sale, purchase, barter, transport, or disturbance of eagles, their nests, and their eggs without a permit issued by the U.S. Fish and Wildlife Service (USFWS).

Any individual or organization conducting activities that may affect bald or golden eagles or their habitats must evaluate potential impacts in accordance with federal guidelines. Activities that could disturb nesting or foraging eagles should be planned to avoid peak presence and breeding periods in the Project Area. Reference to the USFWS "Probability of Presence Summary" can help determine periods of higher eagle activity within the project vicinity.

To proactively reduce potential impacts, Project proponents are encouraged to consult the **National Bald Eagle Management Guidelines**. These guidelines include recommendations for spatial and seasonal buffers, nest monitoring, and other best practices. Employing such measures helps minimize the risk of disturbance and supports compliance with applicable federal protections.

Eagles Probability of Presence for this Project

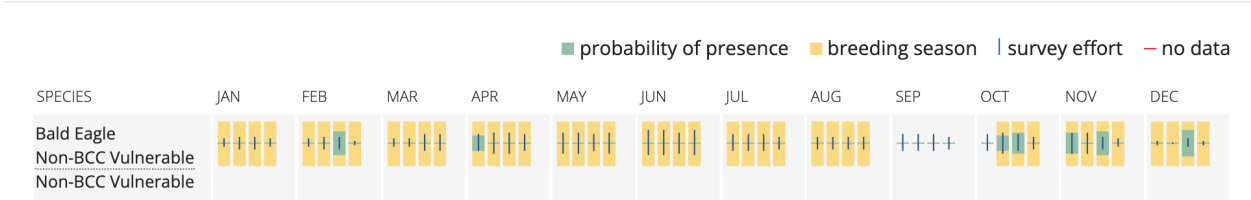
[Tell me about these graphs.](#)

probability of presence

breeding season

survey effort

no data



Migratory Bird Treaty Act (MBTA)

The Migratory Bird Treaty Act (MBTA) prohibits the take—defined to include killing, capturing, possessing, selling, transporting, or trading—of protected migratory bird species without prior authorization from the U.S. Fish and Wildlife Service (USFWS). The definition of "take" under the MBTA includes both intentional and incidental actions that may result in the injury or death of birds, their eggs, or active nests. The USFWS currently interprets the MBTA to apply to incidental take, regardless of intent. Based on the U.S. Fish and Wildlife Service’s Information for Planning and Consultation (IPaC) tool, no migratory bird species are anticipated to nest within the boundaries of the Project Area.

Flowering Plants



Threatened

Eastern Prairie Fringed Orchid (*Platanthera leucophaea*)

The Eastern Prairie Fringed Orchid typically occurs in high-quality mesic to wet prairie habitats, including sedge meadows, marsh edges, and bogs. These habitats are generally characterized by a Floristic Quality Index (FQI) greater than 20 and/or a Mean C-value above 3.5. The Project Area is currently in active row crop production and does not contain or border the high-quality wetland or prairie conditions required by this species. As such, suitable habitat is not present on-site, and the species is not expected to occur. Therefore, the proposed Project will have no direct or indirect effect on *Platanthera leucophaea*, and no further consultation is required.

Insects



Proposed Threatened.



Proposed Threatened

Monarch Butterfly (*Danaus plexippus*)

The Project site is located within the known breeding and migratory range of the monarch butterfly (*Danaus plexippus*). The area proposed for development is currently in row crop production and does not support milkweed species or other vegetation typically required for monarch breeding or foraging habitat. As the Project site does not currently provide suitable habitat, the monarch butterfly is not expected to be exposed to direct or indirect impacts from the proposed development. Therefore, a determination of “no effect” is appropriate, and no further consultation is required.

Western Subspecies North Dakota

Status – Proposed Threatened; Species proposed for official listing as threatened.

Description – No description available.

Critical habitat – No critical habitat has been designated for this species.

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