

To: Posey Solar LLC

From: Adam Holven, Tetra Tech, Inc.

Date: February 25, 2022

Subject: Review of Natural Resources Impact Report within the Posey Final Development Plan Rev M (2/23/2022)

Posey Solar LLC, an affiliate of Arevon Energy, has requested that Tetra Tech re-evaluate natural resource impacts based on the Posey Final Development Plan Rev M dated February 23, 2022. The purpose of this review was to determine if impacts to natural resources are equal or less than those presented in Tetra Tech's *Natural Resources Impact Report, Posey Solar, Posey County, Indiana*, dated June 23, 2021.

The table below provides a summary of findings for this review, which overall indicates a reduction of impacts to all natural resources within the Posey Final Development Plan Rev M.

Environmental Factor	June 23, 2021 Assessment	Assessment based on Posey Final Development Plan Rev M
Topography	Localized grading to facilitate solar panel placement will be required. Overall topography of the Project Area will not be impacted by the Project. Avoidance, minimization, and mitigation measures are not anticipated for impacts to topography	Impacts to topography would be less due to less area being impacted.
Geology	The Project will avoid existing oil and gas infrastructure and will not impact development on existing oil and gas leases. Minimization and mitigation measures are not anticipated for impacts to geology.	Impacts to geology (oil and gas infrastructure and existing oil and gas leases) would be less due to less area being impacted.
Vegetation	Project facilities will largely be sited within agricultural areas and will avoid identified natural resource areas where practicable. Minimization and mitigation measures are not anticipated for impacts to vegetation unless identified during agency consultations.	Impacts to vegetation would be less due to less area being impacted. Project facilities are largely sited within agricultural areas and have avoided identified natural resource areas where practicable.
Soil Types	The Project will convert some Prime Farmland and Prime Farmland if Drained currently used for agriculture to solar energy production. However, at the end of the Project's service life the Project will be decommissioned, and the lessor parties (landowners) can return properties to agricultural use.	Impacts to soil types including Prime Farmland and Prime Farmland if Drained would be less due to less area being impacted.

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Water Resources (Floodplains)	Project facilities will be sited to avoid the 156.3 acres located within the flood hazard areas. If flood hazards areas cannot be avoided, Posey Solar LLC will seek applicable permits from the IDNR and Posey County.	Project facilities have been sited to avoid all but 96 acres of flood hazard areas.
Water Resources (Wetlands and Streams)	Project facilities will be sited to avoid wetlands and streams to the extent practicable, and avoidance buffers for regulated streams. If wetlands and streams cannot be avoided, necessary permits will be obtained from the USACE and IDEM.	Impacts to water resources (wetlands and streams) would be less due to less area being impacted. Project facilities are largely sited within agricultural areas and have avoided identified wetlands and streams where practicable.
Wildlife (Avian/Bat)	<p>Project facilities will largely be sited within agricultural areas and avoid identified natural resource areas where practicable. With regard to avian and bat species, the Project will avoid clearing potential nesting or roosting habitat during use periods (i.e., spring through fall) and will schedule tree clearing activities in the winter. If tree clearing cannot occur in the winter, the Project will consult with the USFWS and IDNR to mitigate any potential impacts to protected species' habitat.</p> <p>The Project Area will be seeded with a vegetation mix that may promote greater biodiversity and higher quality habitat for birds and insects, including pollinators.</p>	<p>Impacts to wildlife (avian/bat) would be less due to less area being impacted.</p> <p>Project facilities are largely sited within agricultural areas and have avoided identified natural resource areas where practicable.</p>

Environmental Factor	June 23, 2021 Assessment	Assessment based on Posey Final Development Plan Rev M
Wildlife (Terrestrial)	<p>For terrestrial species, which are mostly plants, insects, and a few reptiles, the Project will largely be sited within agricultural areas and avoid identified natural resource areas. Potential impacts to natural resource areas will be limited to areas with low plant species diversity, as practical. Silt fencing will be placed between the Project work site and potential natural resources areas to inhibit reptiles from entering the work area. Best management practices will also be established to outline steps to be taken if a state-listed terrestrial species is observed on site. The Project will consult with the IDNR on these proposed steps.</p>	<p>Impacts to wildlife (terrestrial) would be less due to less area being impacted.</p> <p>Project facilities are largely sited within agricultural areas and have avoided identified natural resource areas where practicable.</p>
Wildlife (Marine)	<p>For marine species (mollusks, insects, fish, amphibians, reptiles, and some plants), the Project will largely be sited within agricultural areas and avoid wetlands and streams. Best-management practices will be used to limit off-site sedimentation from Project construction activities. If wetland and stream impacts cannot be avoided, the Project will consult with the USACE and IDEM to acquire necessary permits. Permits of this nature will require an assessment of listed species that may be potentially present and impacts to their habitats.</p>	<p>Impacts to wildlife (marine) would be less due to less area being impacted.</p> <p>Project facilities are sited within agricultural areas and have avoided wetland and streams where practicable.</p>
Air Quality	<p>Based on the minimal impacts from vehicle emissions and fugitive dust anticipated during construction, potential negative impacts to local air quality are not expected. Beneficial impacts from the Project are anticipated to include a regional reduction in carbon emissions over the lifetime of the Project and improvements to long-term regional air quality.</p>	<p>Impacts to air quality would be less due to smaller Project footprint.</p>
Water Quality	<p>A Stormwater Pollution Prevention Plan (SWPPP) will be prepared and implemented for the Project; therefore, water quality degradation due to erosion and sedimentation from Project related construction activity is not anticipated.</p>	<p>Impacts to water quality would be less due to smaller Project footprint.</p>