

Natural Resources Impact Review
SV CSG Wilson School Solar, LLC
Kane County, Illinois



Prepared for:

SV CSG Wilson School Solar, LLC
330 W. State Street
Suite 1
Geneva, IL 60134

Prepared by:

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August 2025

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INTRODUCTION

Area M Consulting (Area M) was contracted to conduct a Natural Resource Impact Report for the SV CSG Wilson School Solar, LLC (Project) located within Kane County, Illinois. The Project, a 1-5-megawatt community solar garden, will be comprised of ground-mounted solar panels, fencing, access and maintenance roads, equipment pads, and vegetative screening. Potential Project impacts to federal and state threatened and endangered (T&E) species, critical habitat, birds, and other protected features (hereafter, “Sensitive Resources”) were evaluated by Area M using United States Fish and Wildlife Service (USFWS) and Illinois Department of Natural Resources (IDNR) databases. Area M conducted a subsequent field survey to assess T&E species habitat and opportunistically identify species present at the time. Each Sensitive Resource identified as potentially occurring with the Project was then designated an effects determination based on the desktop analysis and field survey. This study has been conducted to assist the client with site planning, risk assessment, and to provide best-practice recommendations to mitigate impacts on Sensitive Resources.

ENVIRONMENTAL FRAMEWORK

Sensitive wildlife species, their associated habitats, and rare natural features are protected in Illinois under a range of federal and state laws, regulated by the USFWS, IDNR, and other agencies. Imperiled wildlife species, or those at risk of extinction either globally or locally (T&E species), migratory birds, native birds, game birds, and bald and golden eagles, are generally protected from “Take,” defined as any action that harms, pursues, hunts, shoots, wounds, kills, traps, captures, or collects a species. These Sensitive Resources are protected under the following laws:

- Endangered Species Act of 1973 (ESA)
- Migratory Bird Treaty Act of 1918 (MBTA)
- Bald and Golden Eagle Protection Act (BGEPA)
- Illinois Endangered Species Protection Act (IESPA)

Although this Project does not have a state or federal nexus based on the provided information, “Take” remains prohibited and enforced by the relevant agencies.

PROJECT SETTING

The Project, encompassing approximately 43.3 acres, is located 1.0 miles northwest of Elgin, IL in Section 08, T41N:R7E (Study Area) (Appendix A). The Project includes a flat, agricultural landform bounded by wooded lots to the west and east, wetland to the south, and Highland Ave to the north. The entirety of the Study Area is cultivated annually with corn planted in 2025. The surrounding landscape is dominated by infrastructure associated with the City of Elgin and small developed suburban lots, with interspersed cropland, drainageways, riparian woodlands, and farmsteads. The entire Study Area is private property.

METHODS

Area M staff conducted a desktop assessment and database review to identify potential Sensitive Resources within and near the Study Area. The USFWS Information for Planning and Consultation (IPaC) tool (for

federal species), was queried on July 02, 2025. The IPaC tool was used to request an official Species List of T&E species with the potential to occur within the Study Area and query Critical Habitat, Migratory Bird, and Bald and Goden Eagle information. The Project was also evaluated through the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (if noted in the IPaC Official Species List) to reach effect determinations for both species. The IDNR Ecological Compliance Assessment Tool (EcoCAT) (For state species) was queried on July 02, 2025. The Project was submitted through the EcoCAT portal to determine if T&E species or protected areas have been recorded within the Project vicinity and to request mitigation recommendations.

Area M conducted a pedestrian field survey within the Study Area to document Sensitive Resources and associated habitats on May 29, 2025. The field survey aimed to summarize on-site habitat, document species present, and opportunistically identify Sensitive Resources. This survey was not intended as a substitute for species-specific surveys required or recommended for detecting targeted species.

These components were synthesized to identify potential Project impacts to Sensitive Resources. Area M has included an effects determination for each identified Sensitive Resource (Table 1). Aquatic species (e.g., mussels, fish) have been omitted from this review due to aquatic resource avoidance and the use of erosion/runoff mitigation. State species of Special Concern and state-protected plant species are omitted from this review due to their lack of protection on private land, unless the EcoCAT letter documented records within the Project vicinity.

RESULTS

Based on the desktop review and field survey, **nine** Sensitive Resources are known to occur within the Project vicinity (Table 1, Appendix A). Additionally, bald eagles and native birds may be present within or near the Study Area. Each identified Sensitive Resource is described in relation to the habitat found within the Study Area. Field photos of representative habitat are provided in Appendix E.

Table 1. T&E Species identified through the IPaC and EcoCAT.

Species	Scientific Name	Group	Status ¹	Known Record ²	Potential Habitat	Effect determination ³
Northern long-eared bat	<i>Myotis septentrionalis</i>	Mammal	FE	No	Yes	NE
Tricolored bat	<i>Perimyotis subflavus</i>	Mammal	FPE	No	Yes	NE
Blanding's Turtle	<i>Emydoidea blandingii</i>	Reptile	SE	Yes	No	MANLA
Common Moorhen	<i>Gallinula chloropus</i>	Bird	SE	Yes	No	NE
Whooping crane	<i>Grus americana</i>	Bird	EXPA	No	No	NE
Yellow-headed blackbird	<i>Xanthocephalus xanthocephalus</i>	Bird	ST	Yes	No	NE
Monarch butterfly	<i>Danaus plexippus</i>	Insect	FPT	No	No	NE
Western Regal Fritillary	<i>Argynnis idalia occidentalis</i>	Insect	FPT	No	No	NE
Eastern prairie fringed orchid	<i>Platanthera leucophaea</i>	Plant	FT	No	No	NE

¹ FT-Federal Threatened; FE – Federal Endangered; EXPA – Federal Experimental/non-essential; FC – Federal Candidate; FPE – Federal Proposed Endangered; FTE – Federal Proposed Endangered; ST – State Threatened; SE-State Endangered; SC-State Concerned

² Based on EcoCAT response
USFWS, 2024; IDNR, 2025a

³ Effect Determination: NE – No effect; MANLA – May affect, not likely to adversely affect; May affect

- IPaC review
 - Six federally protected terrestrial species are known to occur within the Project vicinity (Appendix B).

- Three proposed or candidate species are known to occur within the Project vicinity (Appendix B).
 - No Critical Habitat within the Study Area.
- IDNR Threatened and Endangered Species
 - 75 state-listed species in Fayette County (IDNR, 2025b).
- EcoCAT
 - The EcoCAT information request and letter from the IDNR has concluded that adverse effects to protected species are unlikely (Appendix C).
 - Therefore, consultation under 17 Ill. Adm. Code Part 1075 is terminated.
 - Sonneman Woods INAI Site is located in the vicinity.
 - No known northern long-eared bat (NLEB) maternity roosts or hibernacula within the Study Area.
 - IDNR recommends establishing pollinator-friendly habitat wherever feasible.
 - IDNR recommends fencing have a 6-inch gap along the bottom to prevent wildlife movement restriction.
 - IDNR recommends tree clearing between November 1 and March 31, to reduced potential take of the Indiana bat.
- Field Review
 - Suitable nesting habitat for the Blanding's turtle is present
 - No suitable habitat for other protected species is present.
 - No T&E species observed during the field survey

Northern long-eared bat

The northern long-eared bat (NLEB) is a medium-sized bat found throughout much of the eastern and north-central United States, as well as all Canadian provinces (USFWS, 2015). During winter, long-eared bats cluster to hibernate in caves or mines. Their summer and breeding habitats include both live and dead trees, where they roost under loose bark, within cavities, and in crevices. This species rarely roosts in structures such as sheds or barns. Foraging habitat consists of forest understory and woodland edges. Suitable woodland habitat is located along the western edge of the Study Area; however, tree removal will not occur for Project construction. The USFWS has issued a No Effect determination for the Project (Appendix D). Because tree removal is not proposed and there are no documented calling locations, captures, maternity roosts, or hibernacula within the Project vicinity, this species is unlikely to be impacted by Project activities. However, if tree removal does occur, the IDNR recommends avoiding tree clearing between April 1 and October 30 to prevent potential take.

Tricolored bat

The tricolored bat (TCB) is a proposed-endangered species that will likely be listed as endangered by the USFWS service in 2025. The TCB is a small bat, distinguished by its unique tricolored fur that appears dark at the base, lighter in the middle, and dark at the tip (USFWS, 2025b). The TCB is wide ranging across the eastern and central United States. The TCB hibernates in caves or mines during the winter, returning to the same hibernaculum year after year. Summer/breeding habitat includes both live and dead trees deciduous trees. Females form maternity colonies and switch roost trees frequently, though they exhibit high site fidelity. The TCB typically forages at treetop level near waterways and forest edges but may forage

closer to the ground later in the evening. Suitable woodland habitat is located along the western edge of the Study Area; however, tree removal will not occur for Project construction. The USFWS has issued a No Effect determination for the Project (Appendix D). Because tree removal is not proposed and there are no documented calling locations, captures, maternity roosts, or hibernacula within the Project vicinity, this species is unlikely to be impacted by Project activities. However, if tree removal does occur, the IDNR recommends avoiding tree clearing between April 1 and October 30 to prevent potential take.

Blanding's turtle

The Blanding's turtle is medium-sized turtle with a bright yellow chin and throat native to the eastern and central portions of the United States. This species uses a wide range of wetland habitats, but prefers calm, shallow waters with vegetation and a mud bottom (IDNR, 2025c). Adjacent sandy uplands fields with friable soils are required for nesting; this includes uplands which are cropped annually. Due to the proximity of wetlands and presence of friable soils within the Study Area, suitable nesting and overwintering habitat for the Blanding's turtle is present. In the unlikely event that Blanding's turtles are found on site, relocate turtles in imminent danger by hand to safety. Note that the Natural Heritage dataset does contain records of this species within the Project vicinity and Area M has determined the Project May Affect, but is unlikely to adversely affect the Blanding's turtle.

Common moorhen

The common moorhen is a medium sized wetland dwelling bird. It has a red bill that extends to a red plate between the eyes, a yellow bill tip, and a white stripe along the sides of its body. The common moorhen is a migrant and summer resident in northern Illinois. The common moorhen lives in marshy areas and lakes seeking the plants, seeds, aquatic macroinvertebrates and amphibians that it eats (IDNR 2025d). Due to the absence of wetland habitats within the Study Area, Area M has determined the Project will have No Effect on the Common moorhen.

Whooping crane

The whooping crane, the tallest bird in North America, is a large, long-legged bird with snow white plumage and black wing tips (Urbanek and Lewis, 2020). This species is known for recovery efforts to bring it back from the brink of extinction. The whooping crane prefers extensive wetland systems, localized to only a handful of locations in the United States. Migration habitat includes a variety of cropland and adjacent shallow, open water wetlands. Heavily vegetated wetlands are not generally used. Due to the absence of open wetland habitats within the Study Area, Area M has determined the Project will have No Effect on the whooping crane.

Yellow-headed blackbird

The yellow-headed blackbird is a small wetland dwelling bird. The male has black body feathers, yellow head and chest feathers and black wing feathers with a few white patches. The female has brown body feathers and yellow facial feathers. The yellow-headed blackbird is a locally uncommon migrant and summer resident in northern Illinois. It is a rare migrant in the rest of the state. The yellow-headed blackbird lives in marshes and eats insects, grains and seeds (IDNR 2025e). Due to the absence of wetland habitats within the Study Area, Area M has determined the Project will have No Effect on the Yellow headed blackbird.

Monarch butterfly

The monarch butterfly is likely the most well-known butterfly species in North America, ranging throughout the majority of the continental USA with famous overwintering sites in California and Mexico (USFWS, 2025c). This species is large and conspicuous, with bright orange and black wings with white markings (USFWS, 2025d). The monarch utilizes a diverse suite of habitats during its life cycle but is obligated to lay its eggs on milkweed (*Asclepias spp.*), which the larvae feed and use as substrate until after metamorphosis. Nearby flowering plants are used as nectar sources during the summer. Although this species is not offered any official protection under the ESA or IESPA, it may be listed as Threatened under the ESA in the future. During the field survey, no milk weed was identified. Furthermore, the majority of the Study Area is cultivated annually. Due to the lack of observed milk weed and current agricultural land use, Area M has determined the Project will have No Effect on the monarch butterfly.

Western regal fritillary

The Western regal fritillary is a brush-footed butterfly with large, orange and black wings. Regal fritillary butterflies live in tall-grass prairie and other open and sunny locations such as damp meadows, marshes, wet fields, and mountain pastures and is primarily threatened by the loss and fragmentation of native prairie grasslands due to agricultural conversion and development. Due to the lack of grassland habitat and the current agricultural land use within the Study area, Area M has determined the Project will have No Effect on the Western regal fritillary.

Eastern prairie fringed orchid

The eastern prairie fringed orchid is a plant with a single stalk and white flowers native throughout Illinois (USFWS, 2024c). This species occurs in mesic to wet tallgrass prairies and meadows but are also known to grow in roadside ditches and old fields. Due to the absence of appropriate habitat within the Study Area, Area M has determined the Project will have No Effect on the eastern prairie fringed orchid.

Migratory Bird Treaty Act – Native bird species

A total of 457 bird species have been officially documented within Illinois, as observed by the Illinois Ornithological Society (American Ornithologists' Union, 1998). Of these species, the majority are federally protected under the MBTA, a Treaty signed in 1918 to ensure the sustainability of populations of all migratory bird species. Notably, the MBTA protects species that are migratory and non-migratory; a total of 1,106 native bird species are protected by the USFWS under the MBTA.

Species protected under the MBTA utilize a diverse range of habitats ranging from old growth forests to short-grass prairie to urban landscapes. Furthermore, nesting substrates for protected species include traditional trees, bare-ground, commercial structures, and cut banks. The comprehensive nesting season for Illinois birds is long, ranging from January for some species to as late as November for others, though the typical nesting period is 1-2 months. This combination of diverse nesting habitats and wide-ranging nesting phenology creates difficulties in designing universal mitigation strategies for birds, specifically because mitigation strategies are most effective during nesting.

Generally, Area M recommends avoiding grading, earth-moving, and tree-removal May 15 - August 15, when the majority of bird species nest. If nesting birds are documented during Project activities, Area M recommends stopping construction activity near the nest and contacting USFWS or Area M for further guidance, which would likely include stopping work within a designated buffer until the nest either fledges or fails. Pre-construction nesting bird surveys can be performed as an alternative, to effectively clear the Project landscape prior to ground-disturbing activities or tree-removal.

For solar projects such as this, the USFWS recommends burying or installing collector lines beneath PV panels, co-locating generation tie lines with existing infrastructure, and limiting new generation tie lines to a maximum of two miles can help minimize bird collisions. Additionally, fence marking is a cost-effective measure that can be beneficial for certain bird species. The USFWS recommends that all new power lines incorporate avian-safe pole designs to reduce the risk of electrocution. Whenever possible, vegetation management should be scheduled outside of the nesting season.

Bald and golden eagles

Bald and golden eagles, the only two resident eagle species in North America, are provided further protection under the Bald and Golden Eagle Protection Act. Protections for these species extend to unoccupied nests. Only bald eagles are common in this region.

The Study Area does not contain appropriate eagle nesting substrate, due to the lack of large, mature trees. The IDNR did not provide any additional location data on known eagle nests. Area M recommends avoiding and minimizing disturbance near eagle nests, whenever practicable, if observed. No eagle nests were identified from within the Study Area during the field survey.

DISCUSSION

The USFWS, IDNR, and Area M have largely determined the Project will have "No Effect" on most species, with tailored mitigation like avoiding key nesting or breeding seasons where slight risks remain. The natural heritage dataset includes records of eight Sensitive Resources within the Project vicinity. However, Area M has determined that the Project, as communicated, May Affect, not likely to adversely affect or have No Effect on these species due to the absence of habitat, a lack of impacts, or a lack of official observations within the Project vicinity. However, migratory bird species are present within the Project vicinity and will be nesting on the landscape from April - September.

The Illinois Natural Heritage Database contains records of three State-listed T&E species, and no dedicated Illinois Natural Preserves, or registered Land and Water reserves within the vicinity of the Project. Blanding's turtle, Common moorhen and Yellow-headed blackbird have been document occurring in the vicinity of the project, however, due to a lack of impacts to these species, IDNR has terminated consultation for this Project with the following additional recommendations: establishing pollinator-friendly habitat wherever feasible, fencing should have a 6-inch gap along the bottom to prevent wildlife movement restriction and tree clearing should occur between November 1 and March 31. Additionally, Area M recommends, when feasible, conducting construction work outside of bird nesting season to mitigate for potential Take of species protected under the MBTA.

This assessment is based on project plans provided by the Client. Area M understands that the Project is entirely on Private land, does not receive federal funding, and does not require permitting through the USFWS or IDNR. If the Project requires Environmental Species Act (ESA) Section 7/10 consultation through the USFWS, additional clearance surveys or further mitigation efforts may be required. Any alterations to project plans should be reviewed for impacts on potential Sensitive Resources. If any Sensitive Resources are observed during Project activities, Area M advises the Client to contact the IDNR and USFWS for further guidance.

REFERENCES

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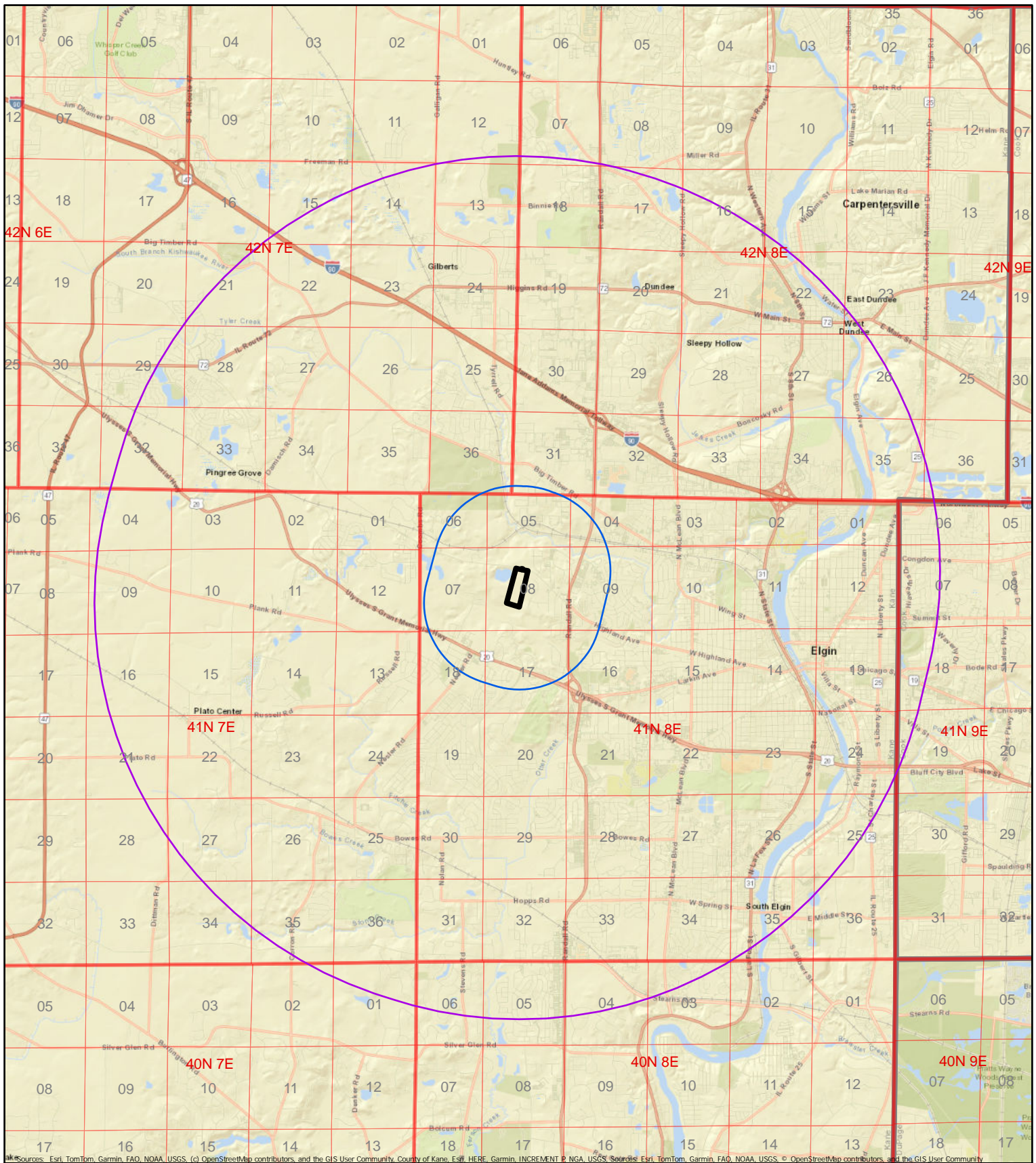
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Appendix A:

Maps



Map Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, County of Kane, Esri, HERE, Garmin, INCREMENT, NGA, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

SV CSG Wilson School Solar, LLC

Kane County, IL
S8 T41N:R7E
43.3 Acres
NAD 83 Zone 16
388024 N
4656354 E

★ Project Location

Study Area

1-Mile Buffer

5-mile Buffer

Section Line

Township Line

County Line

MCHENRY

Crystal Lake

LAKE

COOK

KANE

DUPAGE

Aurora

1030 ft

0 0.5 1 2 Miles

1:100,000

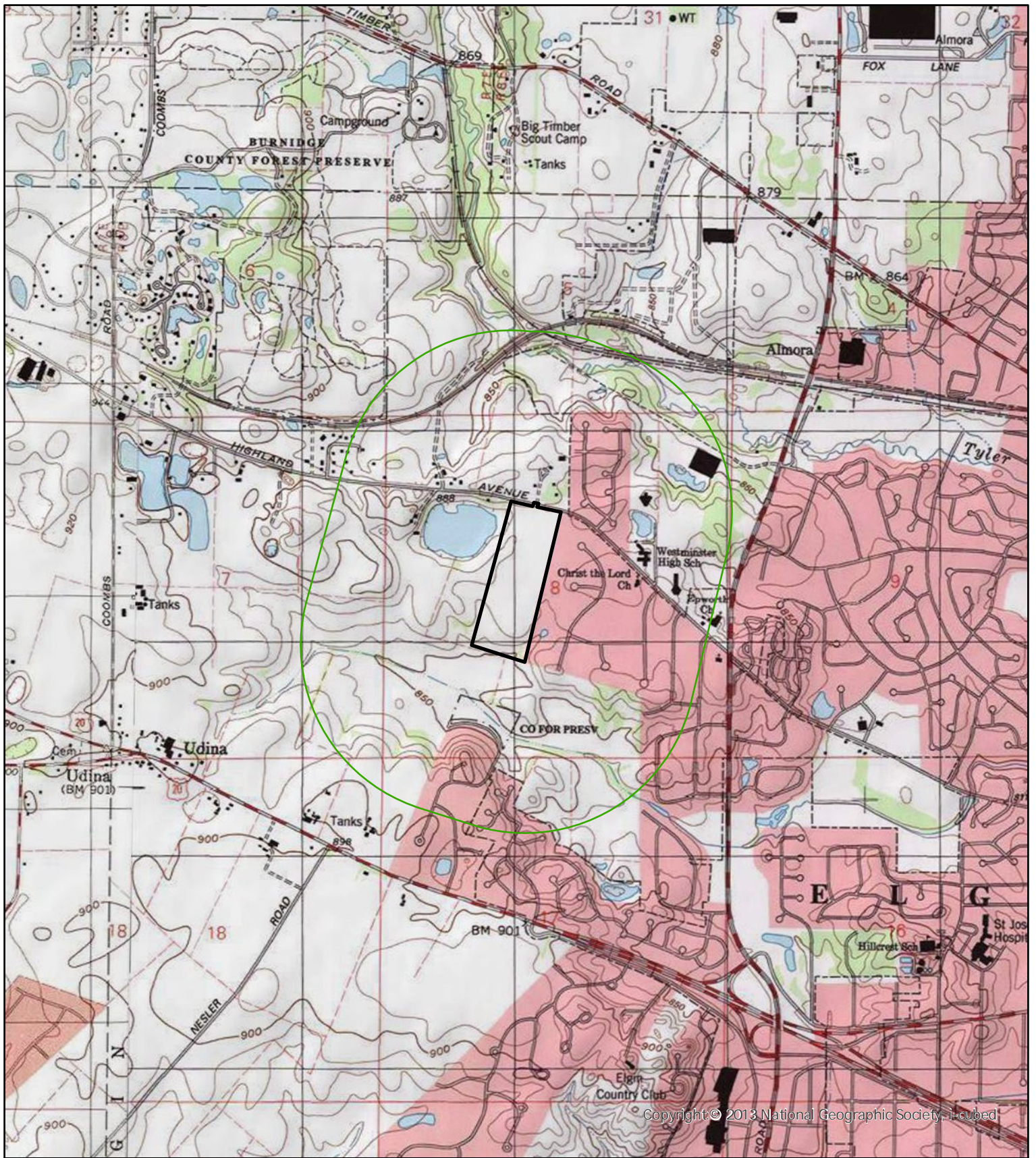
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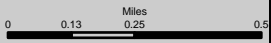

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AREAM



SV CSG Wilson School Solar, LLC		Map 2. 1:24,000 Topographic	
Kane County, IL	 Study Area	   1:24,000	
	 0.5-mile Buffer		

Appendix B:
IPaC Report



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chicago Ecological Service Field Office

1511 47th Ave

Moline, IL 61265-7022

Phone: (309) 757-5800



In Reply Refer To:

07/02/2025 19:29:37 UTC

Project Code: 2025-0117260

Project Name: SV CSG Wilson School Solar, LLC

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

To Whom It May Concern:

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

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

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

Additionally, please note that on March 23, 2022, the Service published a proposal to reclassify the northern long-eared bat (NLEB) as endangered under the Endangered Species Act. The U.S. District Court for the District of Columbia has ordered the Service to complete a new final listing

determination for the NLEB by November 2022 (Case 1:15-cv-00477, March 1, 2021). The bat, currently listed as threatened, faces extinction due to the range-wide impacts of white-nose syndrome (WNS), a deadly fungal disease affecting cave-dwelling bats across the continent. The proposed reclassification, if finalized, would remove the current 4(d) rule for the NLEB, as these rules may be applied only to threatened species. Depending on the type of effects a project has on NLEB, the change in the species' status may trigger the need to re-initiate consultation for any actions that are not completed and for which the Federal action agency retains discretion once the new listing determination becomes effective (anticipated to occur by December 30, 2022). If your project may result in incidental take of NLEB after the new listing goes into effect this will first need to be addressed in an updated consultation that includes an Incidental Take Statement. If your project may require re-initiation of consultation, please contact our office for additional guidance.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

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

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

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

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

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

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

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

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

This species list is provided by:

Chicago Ecological Service Field Office

1511 47th Ave

Moline, IL 61265-7022

(309) 757-5800

PROJECT SUMMARY

Project Code: 2025-0117260

Project Name: SV CSG Wilson School Solar, LLC

Project Type: Power Gen - Solar

Project Description: 5 mw solar facility proposed for construction in 2026. No wetlands will be impacted. No trees will be cleared.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@42.0506868,-88.3534133848039,14z>



Counties: Kane County, Illinois

ENDANGERED SPECIES ACT SPECIES

There is a total of 6 threatened, endangered, or candidate species on this species list.

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

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

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

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

MAMMALS

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Whooping Crane <i>Grus americana</i> Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non- Essential

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Western Regal Fritillary <i>Argynnis idalia occidentalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

FLOWERING PLANTS

NAME	STATUS
Eastern Prairie Fringed Orchid <i>Platanthera leucophaea</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> Follow the guidance provided at https://www.fws.gov/midwest/endangered/section7/s7process/plants/epfos7guide.html Species profile: https://ecos.fws.gov/ecp/species/601	Threatened

CRITICAL HABITATS

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

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

Appendix C:
EcoCAT Query



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
<http://dnr.state.il.us>

JB Pritzker, Governor

Natalie Phelps Finnie, Director

July 16, 2025

Bill French
SV CSG Wilson School Solar, LLC
330 W. State Street
Suite 2 & 3
Geneva, IL 60134

RE: SV CSG Wilson School Solar, LLC
Project Number(s): 2600485
County: Kane

Dear Applicant:

This letter is in reference to the project you recently submitted for consultation. The natural resource review provided by EcoCAT identified protected resources that may be in the vicinity of the proposed action. The Department has evaluated this information and concluded that adverse effects are unlikely. Therefore, consultation under 17 Ill. Adm. Code Part 1075 is terminated.

However, the Department recommends:

Establishing pollinator-friendly habitat as groundcover wherever feasible. Solar Site Pollinator Establishment Guidelines can be found here:
<https://dnr.illinois.gov/conservation/pollinatorscorecard.html>

The site should be de-compacted before planting.

Long term management of the site should be planned for prior to development to ensure successful native pollinator habitat establishment and prevent the spread of invasive species throughout the lifetime of this project. An experienced ecological management consultant should be hired to assist with long-term management.

Required fencing, excluding areas near or adjacent to public access areas, should have a 6-inch gap along the bottom to prevent the restriction of wildlife movement. Woven wire or a suitable habitat wildlife friendly fence should be used. Barbed wire should be avoided.

Trees should be cleared between November 1st and March 31st. All night lighting should follow IDA guidance.



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
<http://dnr.state.il.us>

JB Pritzker, Governor

Natalie Phelps Finnie, Director

This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this review.

Isabella Newingham
Division of Ecosystems and Environment
217-785-5500

Applicant: SV CSG Wilson School Solar, LLC
Contact: Bill French
Address: 330 W. State Street
Suite 2 & 3
Geneva, IL 60134

IDNR Project Number: 2600485
Date: 07/14/2025

Project: SV CSG Wilson School Solar, LLC
Address: Highland Ave., Elgin

Description: 5 MW ground mounted solar facility

Natural Resource Review Results

Consultation for Endangered Species Protection and Natural Areas Preservation (Part 1075)

The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

Blanding's Turtle (*Emydoidea blandingii*)

Common Moorhen (*Gallinula chloropus*)

Yellow-Headed Blackbird (*Xanthocephalus xanthocephalus*)

An IDNR staff member will evaluate this information and contact you to request additional information or to terminate consultation if adverse effects are unlikely.

Location

The applicant is responsible for the accuracy of the location submitted for the project.

County: Kane

Township, Range, Section:

41N, 8E, 8



IL Department of Natural Resources

Contact

Adam Rawe
217-785-5500
Division of Ecosystems & Environment

Government Jurisdiction

Kane County
Natalie Zine
719 S. Batavia Ave.
Geneva, Illinois 60134

Disclaimer

The Illinois Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of natural resources in Illinois. This review reflects the information existing in the Database at the time of this inquiry, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, compliance with applicable statutes and regulations is required.

Terms of Use

By using this website, you acknowledge that you have read and agree to these terms. These terms may be revised by IDNR as necessary. If you continue to use the EcoCAT application after we post changes to these terms, it will mean that you accept such changes. If at any time you do not accept the Terms of Use, you may not continue to use the website.

1. The IDNR EcoCAT website was developed so that units of local government, state agencies and the public could request information or begin natural resource consultations on-line for the Illinois Endangered Species Protection Act, Illinois Natural Areas Preservation Act, and Illinois Interagency Wetland Policy Act. EcoCAT uses databases, Geographic Information System mapping, and a set of programmed decision rules to determine if proposed actions are in the vicinity of protected natural resources. By indicating your agreement to the Terms of Use for this application, you warrant that you will not use this web site for any other purpose.

2. Unauthorized attempts to upload, download, or change information on this website are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and/or the National Information Infrastructure Protection Act.

3. IDNR reserves the right to enhance, modify, alter, or suspend the website at any time without notice, or to terminate or restrict access.

Security

EcoCAT operates on a state of Illinois computer system. We may use software to monitor traffic and to identify unauthorized attempts to upload, download, or change information, to cause harm or otherwise to damage this site. Unauthorized attempts to upload, download, or change information on this server is strictly prohibited by law.

Unauthorized use, tampering with or modification of this system, including supporting hardware or software, may subject the violator to criminal and civil penalties. In the event of unauthorized intrusion, all relevant information regarding possible violation of law may be provided to law enforcement officials.

Privacy

EcoCAT generates a public record subject to disclosure under the Freedom of Information Act. Otherwise, IDNR uses the information submitted to EcoCAT solely for internal tracking purposes.

Appendix D:

NLEB Determination Key Consistency Letter



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chicago Ecological Service Field Office

1511 47th Ave

Moline, IL 61265-7022

Phone: (309) 757-5800



In Reply Refer To:

07/02/2025 19:31:27 UTC

Project code: 2025-0117260

Project Name: SV CSG Wilson School Solar, LLC

Federal Nexus: no

Federal Action Agency (if applicable):

Subject: Record of project representative's no effect determination for 'SV CSG Wilson School Solar, LLC'

Dear Jonathan Knudsen:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on July 02, 2025, for 'SV CSG Wilson School Solar, LLC' (here forward, Project). This project has been assigned Project Code 2025-0117260 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the **Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey)**, invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

Determination for the Northern Long-Eared Bat and/or Tricolored Bat

Based upon your IPaC submission and a standing analysis, your project has reached the following effect determinations:

Species	Listing Status	Determination
Northern Long-eared Bat (<i>Myotis septentrionalis</i>)	Endangered	No effect

Tricolored Bat (*Perimyotis subflavus*)Proposed
Endangered

No effect

Federal agencies must consult with U.S. Fish and Wildlife Service under section 7(a)(2) of the Endangered Species Act (ESA) when an action *may affect* a listed species. Tricolored bat is proposed for listing as endangered under the ESA, but not yet listed. For actions that may affect a proposed species, agencies cannot consult, but they can *confer* under the authority of section 7(a)(4) of the ESA. Such conferences can follow the procedures for a consultation and be adopted as such if and when the proposed species is listed. Should the tricolored bat be listed, agencies must review projects that are not yet complete, or projects with ongoing effects within the tricolored bat range that previously received a NE or NLAA determination from the key to confirm that the determination is still accurate.

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Eastern Prairie Fringed Orchid *Platanthera leucophaea* Threatened
- Monarch Butterfly *Danaus plexippus* Proposed Threatened
- Western Regal Fritillary *Argynnis idalia occidentalis* Proposed Threatened
- Whooping Crane *Grus americana* Experimental Population, Non-Essential

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the species covered by this key. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the Chicago Ecological Service Field Office and reference Project Code 2025-0117260 associated with this Project.

Appendix E:

Field Photos



Representative agricultural landscape in the center of the Study Area, viewed to the north.



Representative agricultural landscape, viewed to the west from the northeastern boundary of the Study Area.



Representative agricultural landscape viewed to the south from the western boundary of the Study Area.



Representative agricultural landscape, viewed to the south from the center of the Study Area