



Stantec Consulting Services Inc.
3303 Flechtner Drive Suite 100
Fargo ND 58103

March 11, 2026

Geronimo Power

Alia Mohammad
Senior Permitting Specialist
8400 Normandale Lake Blvd. Suite 120
Bloomington, MN 55437

Submitted via Email to: amohammad@geronimopower.com

Dear Ms. Mohammad,

Reference: Harmony Storage, LLC – Harmony Storage Project – Cass County, North Dakota

Stantec Consulting Services Inc. (Stantec) was retained by Harmony Storage, LLC (Client) to conduct a Section 7 ESA evaluation for the proposed Harmony Storage project (Project). The United States Fish and Wildlife Service (USFWS) is the regulatory agency with jurisdiction over the Endangered Species Act (ESA) and requires that the Client review proposed actions and determine whether such actions may affect federally listed species or designated critical habitat.

The Project is located in Section 12, Township 140 North, Range 51 West, Cass County, North Dakota (Attachment A). The Study Area consists of approximately 160 acres (Attachment A).

Harmony Storage, LLC (the Client) is proposing the Harmony Storage Project, a 200-megawatt (MW) battery energy storage facility project located north of Mapleton, northwest of Fargo, North Dakota and northeast of Casselton, in Cass County, North Dakota. The Client will be submitting to the North Dakota Public Service Commission (ND PSC) a Certificate of Compatibility (CSC) application.

This letter summarizes the methods and results of a habitat assessment for federally listed, proposed, or candidate species whose ranges include the Study Area in Cass County, North Dakota. In October 2025, Stantec initially reviewed the USFWS Region 6 website for federally listed species in Cass County, North Dakota. On March 3, 2026, Stantec requested and received an Information for Planning and Consultation (IPaC) report for the Project in Cass County, North Dakota from the USFWS South Dakota Ecological Services Field Office (Project ID: 2026-0057639; Attachment B). A review of the IPaC report determined that the following two federally listed and proposed species of insects have the potential to occur within Study Area.

- Monarch butterfly (*Danaus plexippus*) – Proposed Threatened.
- Suckley's cuckoo bumble bee (*Bombus suckleyi*) – Proposed Endangered.

Reference: Harmony Storage, LLC – Harmony Storage Project – Cass County, North Dakota

In October 2025, Stantec staff conducted a field survey to evaluate potential habitat for the above-listed species within the Study Area. A general assessment of habitat types within the Study Area was compared to the general habitat requirements of the listed species (Attachment C). The federally listed and proposed species with their general habitat preferences, as described on the USFWS Region 6 website, and results of the habitat assessment are presented below.

- Monarch butterfly – This butterfly species utilizes grasslands, fields, roadsides, wetlands, and other habitats where its host plant, milkweed (*Asclepias* spp.), and flowers are present. Flowering plant species were only observed along roadside ditches and adjacent waterways and included heath aster (*Symphyotrichum ericoides*), annual sunflower (*Helianthus annuus*), and Canada thistle (*Cirsium arvense*). Since the Study Area consists entirely of cultivated cropland, the Project will have **no effect** on the monarch butterfly. This species is currently proposed for listing and further review would be needed when the species is formally listed.
- Suckley's cuckoo bumble bee – This parasitic bee species inhabits grasslands and forests where host bumble bee nests are present. The Study Area does not contain grasslands or forests that could be suitable for nesting bumble bee species hosts and flowering plants. Additionally, populations of this species are not presently known in North Dakota, and the species has not been observed in the contiguous United States since 2016. Therefore, it is anticipated that the Project will have **no effect** on the Suckley's cuckoo bumble bee.

The IPaC review did not identify USFWS critical habitat areas for bald eagles (*Haliaeetus leucocephalus*) or golden eagles (*Aquila chrysaetos*) within the Study Area. No eagle or raptor nests were observed within the Study Area or from public rights-of-way in the vicinity of the Study Area during the October 2025 field visit. Therefore, it is anticipated that the Project will have **no effect** on bald eagles, golden eagles, or USFWS identified critical habitats.

The IPaC review did not identify migratory birds of concern for the Study Area. Based on the species review, Stantec expects the Project will not cause direct or permanent disturbance to migratory birds. Therefore, it is anticipated that the Project will have **no effect** on migratory BCC.

Based on the results of the desktop review and habitat assessment, Stantec anticipates that the Project will have no effect on the monarch butterfly, Suckley's cuckoo bumble bee, bald eagle or golden eagle, or nesting migratory birds. Additionally, no USFWS identified critical habitats are located within the Study Area. Therefore, as per Section 7(a)(2) responsibilities of the ESA, if no species or their critical habitat are affected by a project, no further consultation with the USFWS is required. Stantec is providing this letter for Harmony Storage, LLC's records only.

Reference: Harmony Storage, LLC – Harmony Storage Project – Cass County, North Dakota

We trust this information meets your needs. Please feel free to contact me if you have questions or need additional information.

Sincerely,

Stantec Consulting Services Inc.

Handwritten signature of Reed Scott in black ink, with a red horizontal line underneath.

Reed Scott
Natural Resource Scientist

Handwritten signature of Mathew Billings in black ink.

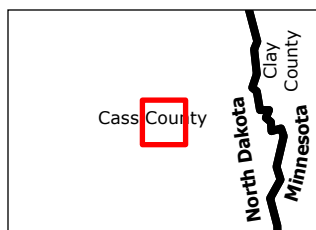
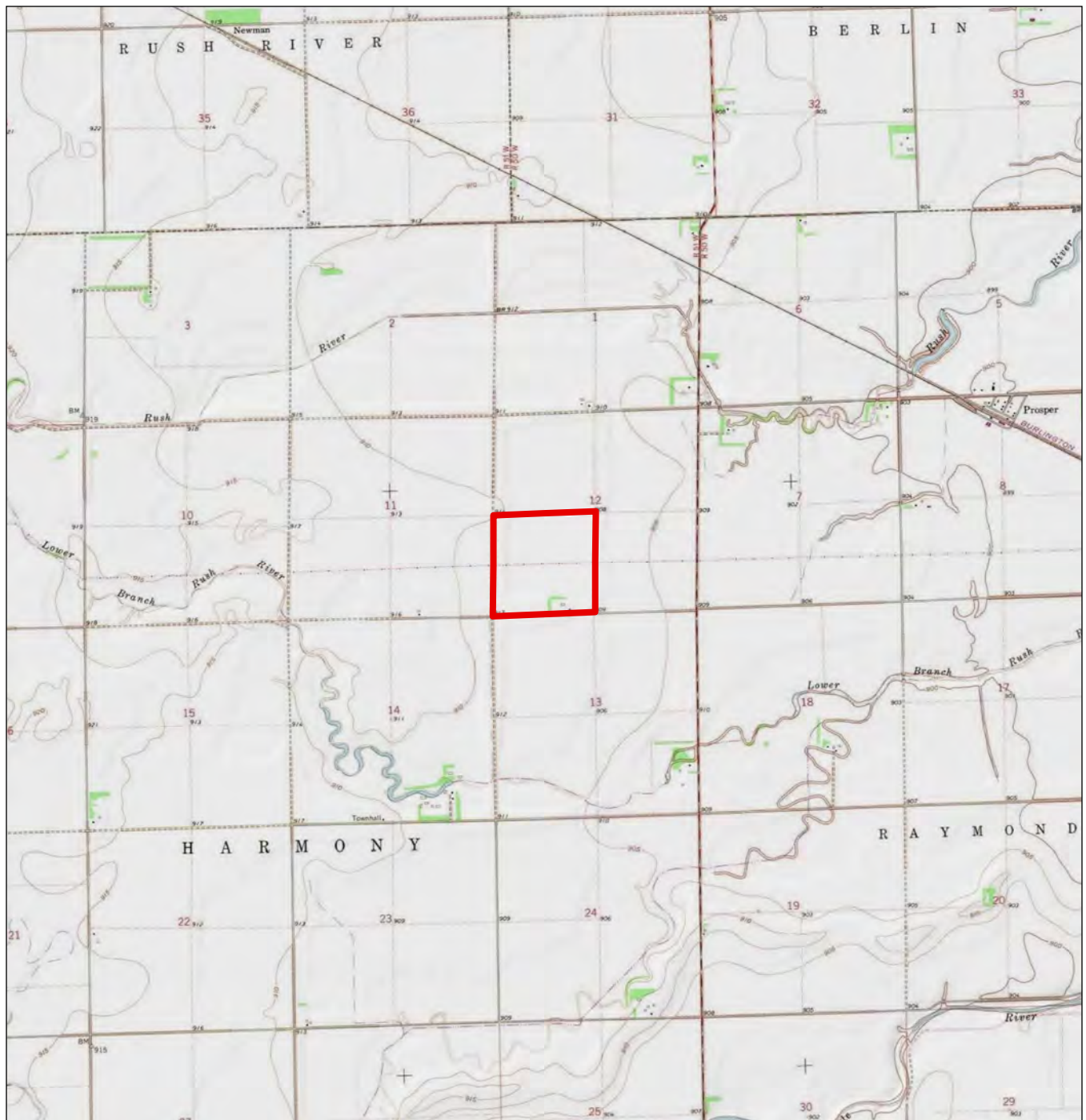
Mathew Billings
Environmental Scientist

Attachment: Attachment A: Project Location Map
Attachment B: USFWS Official Species List (2026-0057639)
Attachment C: Site Photos

Attachment A
Project Location Map



U:\1937193711746\03_data\gis_cad\gisArcPro\Welland_Delin.aprx Revised: 2026-03-02 By: bschafermeyer



Legend
 Project Boundary

0 2,000 4,000 Feet
(At original document size of 8.5x11)
1:48,000



Project Location
T140N, R51W, S14
Harmony, Cass Co., ND

Prepared by BS on 2026-03-02

Client/Project
Harmony Storage, LLC
Threatened and Endangered Species

193711746

Figure No.

1

Title
Project Location & Topography

Attachment B
USFWS Official Species List





United States Department of the Interior

FISH AND WILDLIFE SERVICE
North Dakota Ecological Services Field Office
3425 Miriam Avenue
Bismarck, ND 58501-7926
Phone: (701) 250-4481 Fax: (701) 355-8513



In Reply Refer To:
Project Code: 2026-0057639
Project Name: Harmony Storage

03/03/2026 20:28:53 UTC

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:

Section 7 of the Endangered Species Act

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 Act requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service *if they determine their project and associated actions “may affect” listed species or critical habitat*. If Federal agencies or their non-federal representatives determine their project and associated actions will have “no effect” on listed species, their habitats, or designated critical habitat, consultation is not required. However, if a “no effect” is determined, we recommend that you maintain a written record in support of your conclusion.

Bald and Golden Eagle Protection Act and Migratory Bird Treaty Act

Additionally, while not all are listed as threatened or endangered, eagles and migratory birds

have protections under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA). The BGEPA prohibits take which is defined as, “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb” (50 CFR 22.3). Disturb is defined in regulations as, “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”. The MBTA makes it unlawful without a waiver to pursue, hunt, take, capture, kill, or sell birds listed as migratory birds, including eagles. The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs, and nests.

Service Property Interests

As part of the National Wildlife Refuge System, the Service administers fee title Refuge and Waterfowl Production Areas, as well as wetland and grassland easements, throughout North Dakota. For exact locations of Service interest lands, please contact the appropriate Wetland Management Districts (WMD) for guidance regarding FWS easements.

Northwest ND WMD Complex: Kyle Flanery, (701) 768-2548

Eastern ND WMD Complex: Dave Azure, (701) 285-3341

Central ND WMD Complex (also covers south and west): Todd Luke, (701) 442-5474

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands

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:

North Dakota Ecological Services Field Office

3425 Miriam Avenue

Bismarck, ND 58501-7926

(701) 250-4481

PROJECT SUMMARY

Project Code: 2026-0057639

Project Name: Harmony Storage

Project Type: Battery Energy Storage Systems

Project Description: The project will consist of construction and maintenance of energy storage infrastructure.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@46.95282075,-97.06790344342139,14z>



Counties: Cass County, North Dakota

ENDANGERED SPECIES ACT SPECIES

There is a total of 2 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.

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.

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
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885 General project design guidelines: https://ipac.ecosphere.fws.gov/project/HRTXTQPLVJEQBBMBL67FNQSQQ/documents/generated/9852.pdf	Proposed Endangered

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.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Private Entity

Name: Reed Scott

Address: 3303 Fiechtner Drive, Suite 100

City: Fargo

State: ND

Zip: 58103

Email: reed.scott@stantec.com

Phone: 6053505547

Attachment C

Site Photos



	Date Taken: 10/10/2025 Direction Photo is Taken: W Photo Description: Representative ditch Latitude: 46.9492485 Longitude: -97.0656574
	Date Taken: 10/10/2025 Direction Photo is Taken: E Photo Description: Representative ditch Latitude: 46.9492471 Longitude: -97.0654621
	Date Taken: 10/10/2025 Direction Photo is Taken: N Photo Description: Standing corn Latitude: 46.9492403 Longitude: -97.0646988



Date Taken: 10/10/2025

Direction Photo is Taken: N

Photo Description: Standing corn

Latitude: 46.9496043

Longitude: -97.0632918



Date Taken: 10/10/2025

Direction Photo is Taken: S

Photo Description: Standing corn

Latitude: 46.9496043

Longitude: -97.0632918



Date Taken: 10/10/2025

Direction Photo is Taken: N

Photo Description: Standing corn

Latitude: 46.9504776

Longitude: -97.0631329



Date Taken: 10/10/2025

Direction Photo is Taken: W

Photo Description: Standing corn

Latitude: 46.9534071

Longitude: -97.0647592



Date Taken: 10/10/2025

Direction Photo is Taken: N

Photo Description: Standing corn

Latitude: 46.9551329

Longitude: -97.0708134



Date Taken: 10/10/2025

Direction Photo is Taken: E

Photo Description: Standing corn

Latitude: 46.9551329

Longitude: -97.0708134



Date Taken: 10/10/2025

Direction Photo is Taken: S

Photo Description: Standing corn

Latitude: 46.9551329

Longitude: -97.0708134



Date Taken: 10/10/2025

Direction Photo is Taken: W

Photo Description: Standing corn

Latitude: 46.9551329

Longitude: -97.0708134



Date Taken: 10/10/2025

Direction Photo is Taken: N

Photo Description: Standing corn

Latitude: 46.9551120

Longitude: -97.0726437

 A photograph showing a field of corn plants that appear stressed or dead, standing in a dark, possibly waterlogged or muddy area. The corn stalks are yellow and brittle. A timestamp "2025-10-10 14:01" is visible in the bottom left corner of the photo.	Date Taken: 10/10/2025 Direction Photo is Taken: N Photo Description: Stressed corn within farmed wetland Latitude: 46.9538985 Longitude: -97.0726831
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 A photograph showing a field of corn plants that appear stressed or dead, standing in a dark, possibly waterlogged or muddy area. The corn stalks are yellow and brittle. A timestamp "2025-10-10 14:01" is visible in the bottom left corner of the photo.	Date Taken: 10/10/2025 Direction Photo is Taken: S Photo Description: Stressed corn within farmed wetland Latitude: 46.9538985 Longitude: -97.0726831
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 A photograph showing a ditch filled with tall, green grass and other vegetation. The plants are lush and appear to be in good health. A timestamp "2025-10-10 15:11" is visible in the bottom left corner of the photo.	Date Taken: 10/10/2025 Direction Photo is Taken: E Photo Description: Representative vegetation in ditch Latitude: 46.9492656 Longitude: -97.0733240
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	Date Taken: 10/10/2025 Direction Photo is Taken: E Photo Description: Representative vegetation in ditch Latitude: 46.9492498 Longitude: -97.0728561
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	Date Taken: 10/10/2025 Direction Photo is Taken: W Photo Description: View of ditch wetland feature Latitude: 46.9492758 Longitude: -97.0731010
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	Date Taken: 10/10/2025 Direction Photo is Taken: SE Photo Description: Transmission line structures in corn field Latitude: 46.9527820 Longitude: -97.0655027
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	Date Taken: 10/10/2025 Direction Photo is Taken: N Photo Description: Overview Latitude: 46.9525660 Longitude: -97.0732242
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	Date Taken: 10/10/2025 Direction Photo is Taken: S Photo Description: Overview Latitude: 46.9525660 Longitude: -97.0732242
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