



Long Mott Energy, LLC  
221 H. H. Dow Way  
Midland, MI 48674

23 January 2026

2026-PLM-NRC-001

Docket No. 50-0614

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 2055-0001

**Subject: Endangered Species Act Conservation Measures for the Long Mott Generating Station**

References:

- 1) Long Mott Energy, LLC 2025, "Long Mott Generating Station Construction Permit Application," 2025-PLM-NRC-003, March 31, 2025 (ML25090A057)
- 2) U.S. Nuclear Regulatory Commission, 2025, "Acceptance for Docketing of the Long Mott Generating Station Construction Permit Application", May 12, 2025 (ML25115A247)
- 3) U.S. Nuclear Regulatory Commission, 2025, "Long Mott Generating Station Environmental Report Audit Plan", August 28, 2025 (ML25240B607)

Long Mott Energy, LLC (LME) has reviewed the conservation measures and recommendations provided to the Nuclear Regulatory Commission (NRC) by the U.S. Fish and Wildlife Service (USFWS) in their August 14, 2025 Technical Assistance Letter concerning the Long Mott Generating Station (LMGS) project. Under formal oath and affidavit, LME commits to implementing the following species-specific conservation measures in the construction and operation of LMGS:

**Migratory Birds**

- Workers will conduct daily walkdown surveys to avoid nest establishment in or in the immediate vicinity of work areas.
- Vehicle speed limits will be implemented to mitigate vehicle collisions to the extent possible.

**Whooping Cranes (*Grus americana*)**

- Tall structures including buildings, construction equipment 15 feet high or higher, fences over four feet in height, and antennas in the area will be marked/flagged or laid down on the ground at night or when not in use to provide higher visibility and avoid or minimize potential whooping crane collisions.
- Workers will be educated, with approved USFWS materials, to recognize whooping cranes, their habitat, and their federally endangered status. During the construction



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period, a designated observer will have stop-work authority and will stop work if whooping cranes land within 1,000 ft of the active construction area until cranes have moved beyond that distance or left the area and work stoppage can occur safely.

- All sightings of whooping cranes will be documented and reported to the Texas Coastal and Central Plains Ecological Services Field Office in Corpus Christi.
- To the extent practicable, LME will implement the practices set forth in Reducing Avian Collisions with Power Lines: State of the Art in 2012 to shield and mark any required powerlines.

#### **Eastern Black Rail (*Laterallus Jamaicensis Jamicensis*)**

- Disturbance of the small pocket of suitable eastern black rail habitat located within the project area will be avoided to extent practicable. If any disturbance of this area is required, it will occur outside of the sensitive breeding period (March 1 through September 30).

#### **Tricolored Bat (*Perimyotis subflavus*)**

- Any tree clearing required for construction will occur outside of the tricolored bat maternity season (May 1 through July 15). Less than 0.5 acres of marginal quality roost trees will be removed throughout the entirety of the construction period.
- All permanent lighting will be down-shielded and will be pointed away from potential habitat to the extent practicable in accordance with facility security lighting standards.

#### **Monarch Butterfly (*Danaus plexippus*)**

- Temporarily disturbed areas will be seeded and replanted with native grasses, milkweeds, and nectar plants. This commitment has been stated in the submitted Environmental Report (Table 4.6-1)

LME also acknowledges USFWS recommendations to include analyses of flooding and hurricane force winds, contingency plans for hurricane response, drought sensitivity, and sea level rise for the LMGS project. LME has already provided commensurate information to support these analyses in Chapter 2 of the Preliminary Safety Analysis Report and the Environmental Report and does not believe that additional information is required to accommodate these requests.

LME appreciates the opportunity to assist with USFWS coordination and consultation. If there are any questions regarding these commitments, please contact Mark Feltner ([MFeltner@dow.com](mailto:MFeltner@dow.com)).



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Sincerely,

DocuSigned by:  
A handwritten signature in black ink that reads "Charles O'Connor".  
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Charles O'Connor

Sr. Director, Engineering and Projects  
Long Mott Energy, LLC

Cc:

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