

Exhibit R

**United States Fish and Wildlife Service and
Ohio Department of Natural Resources Correspondence**

From: [Ohio, FW3](#)
To: [Dohoney, Courtney](#)
Cc: nathan.reardon@dnr.state.oh.us; [Parsons, Kate](#); [mcarney](#)
Subject: Scioto Farms Solar Project with 1,070 acres of land in Pickaway County, Ohio
Date: Monday, July 19, 2021 1:26:48 PM
Attachments: [image.png](#)
[image.png](#)
[Scioto Farms Solar and Bald eagle nest.pdf](#)
[Ohio Solar Site Pollinator Habitat Planning and Assessment Form v.9 FINAL 5_3_2018.pdf](#)



UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994



TAILS# 03E15000-2021-TA-1718

Dear Ms. Dohoney,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥ 3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Should the proposed site contain trees ≥ 3 inches dbh, we recommend that trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. **The Service requests additional information on the extent of tree clearing proposed so that we may evaluate the potential for the project to effect the Indiana and northern long-eared bat and recommend appropriate minimization measures. Please provide estimated acreages of forest clearing as well as maps indicating areas to be cleared.**

The proposed project is in the range of several federally-listed freshwater mussels including **clubshell (*Pleurobema clava*, endangered)**, **northern riffleshell (*Epioblasma torulosa rangiana*, endangered)**, **rayed bean (*Villosa fabalis*, endangered)**, and **round hickory nut (*Obovaria subrotunda*, proposed threatened)**. These mussels are known from the Scioto River in Pickaway County, Ohio. Should the proposed project directly or indirectly impact the Ohio River or its naturally vegetated riparian zone, we recommend that a survey be conducted to determine the presence or probable absence of these mussels in the vicinity of the proposed site. Any survey should be designed and conducted in coordination with the Ohio Field Office. Surveyors must have valid Federal and State permits to survey for federally listed mussels in Ohio.

Bald Eagle: The project lies within the range of the bald eagle (*Haliaeetus leucocephalus*). Bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d, BGEPA), which prohibits, among other things, the killing and disturbance of eagles. To evaluate your project's potential to affect bald eagles, please visit: <https://www.fws.gov/midwest/eagle/permits/baeatake/index.html>.

Our records indicate that a bald eagle nest is located within approximately 0.6 miles of the project area (see attached map for approximate nest location). Our database of nest locations may not be complete because new nests are built each year, and nesting pairs sometimes build multiple nests. Therefore, we recommend that the site and surrounding area be evaluated to determine if any additional eagle nests are present and to validate the actual nest location.

In order to avoid take of bald eagles, we recommend that no tree clearing occur within 660 feet of a bald eagle nest or within any woodlot supporting a nest tree. Further we request that work within 660 feet of a nest or within the direct line-of-site of a nest be restricted from January 15 through July 31. This will prevent disturbance of the eagles from the egg-laying period until the young fledge, which encompasses their most vulnerable times. Once site specific eagle nest information is available, we can work with you to determine the appropriate buffer from the nest(s) relative to your proposed activities.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus it is important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in

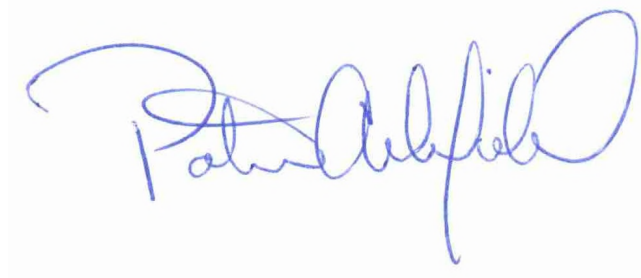
maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrice M. Ashfield". The signature is fluid and cursive, with a large initial "P" and "A".

Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW



Ohio Department of Natural Resources

MIKE DeWINE, GOVERNOR

MARY MERTZ, DIRECTOR

Office of Real Estate

John Kessler, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6621
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September 1, 2021

Courtney Dohoney
Stantec Consulting Services, Inc.
3001 Washington Blvd, Suite 500
Arlington, VA 22201

Re: 21-0688; Scioto Farms Solar Project

Project: The proposed project will include solar modules, a racking system, inverters, meteorological towers, perimeter fencing, internal access roads, an operation and maintenance facility, and a Project substation.

Location: The proposed project is located near Circleville, Pickaway County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Natural Heritage Database: The Natural Heritage Database has the following data at or within a one mile radius of the project area:

Pale umbrella-sedge (*Cyperus acuminatus*), P
Burhead (*Echinodorus berteri*), T
Elktoe (*Alasmodonta marginata*), SC
Purple wartyback (*Cyclonaias tuberculata*), SC
Fanshell (*Cyprogenia stegaria*), E, FE
Northern riffleshell (*Epioblasma rangiana*), E, FE
Snuffbox (*Epioblasma triquetra*), E, FE
Pocketbook (*Lampsilis ovata*), E
Black sandshell (*Ligumia recta*), T
Threehorn wartyback (*Obliquaria reflexa*), T
Clubshell (*Pleurobema clava*), E, FE
Ohio pigtoe (*Pleurobema cordata*), E
Kidneyshell (*Ptychobranhus fasciolaris*), SC
Fawnsfoot (*Truncilla donaciformis*), T
Western creek chubsucker (*Erimyzon claviformis*), SC
Least darter (*Etheostoma microperca*), SC

Tippecanoe darter (*Etheostoma tippecanoe*), T
Shovelnose sturgeon (*Scaphirhynchus platyrhynchus*), E
Davenport Pond Conservation Site
Circleville Canal Wildlife Area – ODNR Division of Wildlife
Marsha Gunder Schneider Preserve – Appalachia Ohio Alliance

The review was performed on the project area specified in the request as well as an additional one mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity. Additional comments on some of the features may be found in pertinent sections below.

A Conservation Site is an area deemed by the Natural Heritage Database to be a high quality natural area not currently under formal protection. It may, for example, harbor one or more rare species, be an outstanding example of a plant community or have geologically significant features, etc. These sites may be in private ownership and our listing of them does not imply permission for access.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; U = state status under review; X = presumed extirpated in Ohio; FE = federal endangered, and FT = federal threatened.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that Best Management Practices be utilized to minimize erosion and sedimentation.

The Division of Wildlife is working closely with our partners at Ohio Pollinator Habitat Initiative (OPHI) to create and enhance pollinator habitat at solar power installations. The OPHI Solar Pollinator Program Advisory Team has developed the Ohio Solar Site Pollinator Habitat Planning and Assessment Form and is available for your use. The form can be found at the following: <http://nebula.wsimg.com/7cf0240c398d5819e3e6ff011f0ba456?AccessKeyId=570E4FC7FCD2ED2F0C1A&disposition=0&alloworigin=1>. We recommend that the areas between and around the solar panels be planted with legumes and wildflowers (i.e. forbs) that are beneficial to pollinators and other wildlife and reduce use of non-native grass and gravel. The recommended legumes and forbs listed below are low-growing so as not to cast shadows on the solar panels and would only require one to two mowings a year for maintenance, which should minimize maintenance costs. For other areas of the installation where vegetation does not have to be low-growing, alternative pollinator mixes are available with a more diverse array of flowering plants. This perennial vegetation will provide beneficial foraging habitat to songbirds and pollinators while reducing storm water runoff, standing water, and erosion. Please contact the Ohio Pollinator Habitat Initiative <http://www.ophi.info/>, and specifically Mike Retterer mretterer@pheasantsforever.org for further information on solar power facility pollinator plantings.

Recommended low-growing grasses and forbs may include:

Little Bluestem	<i>Schizachyrium scoparium</i>
Sideoats Grama	<i>Bouteloua curtipendula</i>
Alfalfa	<i>Medicago spp.</i>
Alsike Clover	<i>Trifolium hybridum</i>
Brown-eyed Susan	<i>Rudbeckia triloba</i>
Butterfly Milkweed	<i>Asclepias tuberosa</i>
Lanceleaf Coreopsis	<i>Coreopsis lanceolata</i>
Partridge Pea	<i>Chamaecrista fasciculata</i>
Timothy	<i>Phleum pratense</i>
Orchardgrass	<i>Dactylis glomerata</i>
Crimson Clover	<i>Trifolium incarnatum</i>
Ladino or White Clover	<i>Trifolium repens</i>

The project is within the vicinity of records for the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species.. Because presence of state endangered bat species has been established in the area, summer tree cutting is not recommended, and additional summer surveys would not constitute presence/absence in the area. However, limited summer tree cutting inside this buffer may be acceptable after further consultation with DOW (contact Erin Hazelton at Erin.hazelton@dnr.ohio.gov).

In addition, the entire state of Ohio is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species, the northern long-eared bat (*Myotis septentrionalis*), a state endangered and federally threatened species, the little brown bat (*Myotis lucifugus*), a state endangered species, and the tricolored bat (*Perimyotis subflavus*), a state endangered species. During the spring and summer (April 1 through September 30), these bat species predominately roost in trees behind loose, exfoliating bark, in crevices and cavities, or in the leaves. However, these species are also dependent on the forest structure surrounding roost trees. The DOW recommends tree cutting only occur from October 1 through March 31, conserving trees with loose, shaggy bark and/or crevices, holes, or cavities, as well as trees with DBH ≥ 20 if possible.

The DOW also recommends that a desktop habitat assessment is conducted, followed by a field assessment if needed, to determine if a potential hibernaculum is present within the project area. Direction on how to conduct habitat assessments can be found in the current USFWS “Range-wide Indiana Bat Survey Guidelines.” If a habitat assessment finds that a potential hibernaculum is present within 0.25 miles of the project area, please send this information to Erin Hazelton for project recommendations. If a potential or known hibernaculum is found, the DOW recommends a 0.25-mile tree cutting and subsurface disturbance buffer around the hibernaculum entrance, however, limited summer or winter tree cutting may be acceptable after consultation with the DOW. If no tree cutting or subsurface impacts to a hibernaculum are proposed, this project is not likely to impact these species.

The project is within the range of the following listed mussel species.

Federally Endangered

clubshell (*Pleurobema clava*)

fanshell (*Cyprogenia stegaria*)
northern riffleshell (*Epioblasma torulosa rangiana*)
purple cat's paw (*Epioblasma o. obliquata*)
rayed bean (*Villosa fabalis*)
snuffbox (*Epioblasma triquetra*)

Federally Threatened

rabbitsfoot (*Quadrula cylindrica cylindrica*)

State Endangered

butterfly (*Ellipsaria lineolata*)
ebonyshell (*Fusconaia ebenus*)
elephant-ear (*Elliptio crassidens*)
long-solid (*Fusconaia maculata maculata*)
Ohio pigtoe (*Pleurobema cordatum*)
pyramid pigtoe (*Pleurobema rubrum*)
sharp-ridged pocketbook (*Lampsilis ovata*)
washboard (*Megaloniais nervosa*)

State Threatened

black sandshell (*Ligumia recta*)
fawnsfoot (*Truncilla donaciformis*)
pondhorn (*Unio merus tetralasmus*)
threehorn wartyback (*Obliquaria reflexa*)

Due to the location, and that there is no in-water work proposed in a perennial stream of sufficient size, this project is not likely to impact these species.

The project is within the range of the following listed fish species.

Federally Endangered

Scioto madtom (*Noturus trautmani*)

State Endangered

bigeye shiner (*Notropis boops*)
goldeye (*Hiodon alosoides*)
northern brook lamprey (*Ichthyomyzon fossor*)
northern madtom (*Noturus stigmosus*)
shortnose gar (*Lepisosteus platostomus*)
spotted darter (*Etheostoma maculatum*)
shovelnose sturgeon (*Scaphirhynchus platyrhynchus*)

State Threatened

blue sucker (*Cycleptus elongatus*)
lake chubsucker (*Erimyzon sucetta*)
paddlefish (*Polyodon spathula*)
Tippecanoe darter (*Etheostoma tippecanoe*)

The DOW recommends no in-water work in perennial streams from March 15 through June 30 to reduce impacts to indigenous aquatic species and their habitat. If no in-water work is proposed in a perennial stream, this project is not likely to impact these or other aquatic species.

The project is within the range of the lark sparrow (*Chondestes grammacus*), a state endangered bird. This sparrow nests in grassland habitats with scattered shrub layers, disturbed open areas, as well as patches of bare soil. In the Oak Openings area west of Toledo, lark sparrows occupy open grass and shrubby fields along sandy beach ridges. These summer residents normally migrate out of Ohio shortly after their young fledge or leave the nest. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the least bittern (*Ixobrychus exilis*), a state threatened bird. This secretive marsh species prefers dense emergent wetlands with thick stands of cattails, sedges, sawgrass or other semiaquatic vegetation interspersed with woody vegetation and open water. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the northern harrier (*Circus hudsonis*), a state endangered bird. This is a common migrant and winter species. Nesters are much rarer, although they occasionally breed in large marshes and grasslands. Harriers often nest in loose colonies. The female builds a nest out of sticks on the ground, often on top of a mound. Harriers hunt over grasslands. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this habitat will not be impacted, this project is not likely to impact this species.

The project is within the range of the sandhill crane (*Grus canadensis*), a state threatened species. Sandhill cranes are primarily a wetland-dependent species. On their wintering grounds, they will utilize agricultural fields; however, they roost in shallow, standing water or moist bottomlands. On breeding grounds they require a rather large tract of wet meadow, shallow marsh, or bog for nesting. If grassland, prairie, or wetland habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 1 through August 31. If this habitat will not be impacted, this project is not likely to have an impact on this species.

The project is within the range of the upland sandpiper (*Bartramia longicauda*), a state endangered bird. Nesting upland sandpipers utilize dry grasslands including native grasslands, seeded grasslands, grazed and ungrazed pasture, hayfields, and grasslands established through the Conservation Reserve Program (CRP). If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of April 15 through July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

Geological Survey: The Division of Geological Survey has the following comments.

Physiographic Region

The proposed project area is in Wayne Township, Pickaway County. This area is in the Columbus Lowland physiographic region. This region is characterized by lowland terrain surrounded by relative uplands. There is a broad slope towards the Scioto Valley and many large streams throughout the region. The geology of the region consists of loamy Wisconsinan-age till and extensive outwash in the Scioto Valley covering underlying bedrock (Ohio Department of Natural Resources, Division of Geological Survey, 1998).

Surficial/Glacial Geology

The project area lies within the glaciated margin of the state and includes several Wisconsinan-age glacial features. Most of the project area is covered by a ground moraine feature that consists of flat to gently undulating terrain and a loam till with a thin loess cover. A small portion of the project area in the northwest corner is covered by an end moraine deposit which is similar to the adjacent ground moraine deposit but consists of hummocky ridges and more variable terrain. The eastern boundary of the project area overlies alluvium and alluvial terrace deposits consisting of fine to coarse sand, gravel and cobbles in areas of shallow bedrock (Pavey et al, 1999). Glacial drift throughout most of the study area is between 78 and 186 feet thick. Drift is thinnest in the north and thickest in the south (Powers and Swinford, 2004).

Bedrock Geology

The uppermost bedrock unit in the project area is the Ohio and Olentangy Shales Undivided. This unit is Devonian-age and consists of greenish gray to gray shale. The unit is clayey and often contains disseminated pyrite. Locally this unit may contain lenses or nodules of limestone as well as thin beds of brownish-black shale in the upper portion. This unit underlies the entire project area. Bedrock may be exposed in outcrops and roadcuts within the boundary of the project area (Slucher et al, 2006).

Oil, Gas and Mining

ODNR has record of 12 oil and gas wells within one mile of the proposed project area. Most of these wells are listed as dry, plugged or expired permit (never drilled) (Ohio Department of Natural Resources, Division of Oil and Gas, Ohio Oil and Gas Wells Locator).

ODNR does not have record of any mining operations within the project area. The nearest mine to the project area is operated by Severson Environmental Services, Inc. This mine is a topsoil and clay extraction and is located approximately 0.3 miles from the site boundary (Ohio Department of Natural Resources, Division of Mineral Resources, Mines of Ohio).

Seismic Activity

Several small earthquakes have historically been recorded in the region. The three events closest to the site are listed in the chart below (Ohio Department of Natural Resources, Division of Geological Survey, Ohio Earthquake Epicenters):

Date	Magnitude	Distance to Site Boundary	County	Township
Jan. 16, 1870	2.9	8.9 miles	Pickaway	Jackson
Nov. 12, 1899	3.1	14.3 miles	Ross	Scioto
Oct. 21, 2013	2.0	24.7 miles	Fairfield	Berne

Soils

According to the USDA Web Soil Survey, the project area consists primarily of soils derived from alluvium, glaciofluvial deposits, loess, outwash and till. Miamian, Kokomo and Crosby are the most common soil series found within the boundaries of the project area. Together, these soils make up over 95% of the project area (USDA Web Soil Survey).

There is a low to moderate risk of shrink-swell potential in these soils. Other limiting factors include poor drainage and ponding in some soils. Slope remains relatively flat, with slope seldom exceeding a 6% grade. Slope is steeper along stream banks (USDA Web Soil Survey).

Groundwater

Groundwater resources are limited throughout the project area. Wells developed in bedrock are likely to yield less than five gallons per minute (Schmidt, 1980 and Ohio Department of Natural Resources, Division of Water, Bedrock Aquifer Map, 2000). Wells developed in glacial material are likely to yield 5 to 25 gallons per minute. The Prairie Complex Aquifer underlies the project area. Higher groundwater yields typically reflect larger diameter, properly developed and screened wells (Ohio Department of Natural Resources, Division of Water, Statewide Unconsolidated Aquifer Map, 2000).

ODNR has record of 64 water wells drilled within one mile of the project area. These wells range in depth from 26 to 300 feet deep, with an average depth of 86.1 feet. The most common aquifer listed is sand and gravel. There are nine wells that list a bedrock aquifer of either shale or limestone, the remaining wells have all been developed in unconsolidated glacial material. A sustainable yield of 15 to 100 gallons per minute is expected from wells drilled in this area based on well log records. The average sustainable yield from these records within one mile was 31.7 gallons per minute. This is based on records from six wells within one mile of the project area that contain sustainable yield data (Ohio Department of Natural Resources, Division of Water, Ohio Water Wells).

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Mike Pettegrew at mike.pettegrew@dnr.ohio.gov if you have questions about these comments or need additional information.

Mike Pettegrew
Environmental Services Administrator (Acting)

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

12/13/2021 2:32:38 PM

in

Case No(s). 21-0868-EL-BGN

Summary: Application Exhibit R - United States Fish and Wildlife Service and Ohio
Department of Natural Resources Correspondence electronically filed by Teresa
Orahood on behalf of Sommer Sheely