



EXHIBIT 20A
Supplemental Federal Threatened and Endangered Species Effects Review
Tanner Road Solar Project
Kane County, Illinois

USFWS IPaC Project Code: 2026-0065413

Date: August 2026

Purpose

This memorandum is provided to clarify the relationship between the Illinois Department of Natural Resources EcoCAT review and the U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) review submitted for the Tanner Road Solar Project.

The two reviews address different regulatory programs and therefore provide different types of information.

The **EcoCAT review** evaluates resources contained in the Illinois Natural Heritage Database, including State-listed threatened and endangered species and protected natural areas.

The **USFWS IPaC review** is a federal screening tool used to identify federally listed, proposed, candidate, or experimental-population species that may occur within a project's broader geographic area and therefore should be considered in a project-specific effects analysis. Inclusion of a species on an IPaC Official Species List does **not** mean that the species occurs on the project site or that the project will affect the species.

EcoCAT Review

The Illinois EcoCAT consultation determined that the Illinois Natural Heritage Database contains no records of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the proposed project. The EcoCAT consultation was therefore terminated without additional consultation requirements.

USFWS IPaC Review

An Official Species List was obtained from the U.S. Fish and Wildlife Service through IPaC under Project Code **2026-0065413**.

The IPaC report identified three species for consideration:

- **Whooping Crane (*Grus americana*)** – Eastern Migratory Nonessential Experimental Population
- **Monarch Butterfly (*Danaus plexippus*)** – Proposed Threatened
- **Western Regal Fritillary (*Argynnis idalia occidentalis*)** – Proposed Threatened



The IPaC report also expressly states that **there are no federally designated or proposed critical habitats within the project area under the jurisdiction of the U.S. Fish and Wildlife Service.**

The Official Species List is a screening document rather than an effects determination. A project-specific review of the three identified species is provided below.

Existing Site Conditions

The Tanner Road Solar Project is proposed primarily on land that has historically been and continues to be used for agricultural production. The solar development will involve installation of photovoltaic modules on driven-pile racking, underground electrical collection facilities, electrical equipment, access improvements, fencing, and related infrastructure.

Construction activities will occur predominantly within previously disturbed agricultural land. The project does not involve conversion of an intact native prairie or a known protected natural area.

Following construction, substantial areas beneath and between the solar arrays will remain vegetated rather than being converted to impervious development.

Species Effects Analysis

1. Whooping Crane

The whooping crane appearing on the IPaC list is the **Eastern Migratory Population**, which has been designated by USFWS as a nonessential experimental population. This population migrates through portions of the Midwest, including Illinois.

The project site is actively managed agricultural land and does not contain known whooping crane nesting habitat. The proposed solar facility will not affect designated critical habitat; none occurs within the project area.

The project is not expected to interfere with reproduction, nesting, or established roosting habitat for the species. Construction effects will be localized and temporary, and the project does not involve wind turbines or similar elevated rotating structures presenting an aerial collision hazard.

Based on the nature of the site, the proposed project activities, and the absence of critical habitat within the project area, **no adverse effect to the whooping crane is anticipated.**

2. Monarch Butterfly

The monarch butterfly is presently **proposed for listing as threatened** under the federal Endangered Species Act. As of August 2026, a final federal listing rule has not taken effect.

USFWS proposed critical habitat for the monarch is confined to overwintering locations in coastal California. The Tanner Road Solar Project does not overlap proposed monarch critical habitat.



The project is located on historically cultivated agricultural land rather than an intact native habitat preserve. Construction disturbance will be temporary, and the completed solar facility will maintain vegetated areas beneath and around the photovoltaic array.

The project therefore is not expected to eliminate habitat essential to the conservation of the monarch or materially interfere with the species' migration or reproduction.

Based upon these conditions, **no adverse effect to the monarch butterfly is anticipated.**

Where practicable, use of pollinator-compatible vegetation within the solar facility may provide additional habitat value following construction.

3. Western Regal Fritillary

The western regal fritillary is presently **proposed for listing as threatened** under the Endangered Species Act.

USFWS describes the species as strongly associated with native prairie and large grassland habitats containing the specific combination of violet larval host plants, nectar-producing plants, and native warm-season bunchgrasses necessary to support its life cycle. The species is generally uncommon outside native prairie remnants.

The Tanner Road Solar development area consists primarily of historically cultivated agricultural land and is not an intact native prairie. Development of the solar facility therefore will not involve conversion of a known native prairie ecosystem supporting the habitat characteristics normally associated with western regal fritillary populations.

No critical habitat for the western regal fritillary has been designated within the project area.

Based upon the existing agricultural land use, absence of known native prairie habitat within the development footprint, and nature of the proposed construction, **no adverse effect to the western regal fritillary is anticipated.**

Conclusion

The EcoCAT and IPaC results are not contradictory.

EcoCAT determined that the Illinois Natural Heritage Database contains no records of State-listed threatened or endangered species or protected natural areas in the vicinity of the project.

The federal IPaC report separately identified three species that should be considered because their broader geographic ranges potentially encompass the project area. IPaC did not determine that these species are present on the Tanner Road Solar site and did not determine that the project would adversely affect them.

A project-specific review of the three species indicates:



Species	Federal Status	Project Finding
Whooping Crane	Eastern Migratory Nonessential Experimental Population	No adverse effect anticipated
Monarch Butterfly	Proposed Threatened	No adverse effect anticipated
Western Regal Fritillary	Proposed Threatened	No adverse effect anticipated

In addition, the USFWS IPaC report confirms that **no federally designated or proposed critical habitat occurs within the project area.**

Accordingly, based on currently available information and the existing conditions of the project site, the Tanner Road Solar Project is **not anticipated to adversely affect any of the species identified by the IPaC screening review.**

Because USFWS recommends verification of an Official Species List after 90 days, Catfish Renewable Energy LLC will obtain or verify an updated IPaC species list prior to construction and will reevaluate this determination if the species list, project footprint, or site conditions materially change.