

Illinois Department of Natural Resources
CONSERVATION PLAN
(Application for an Incidental Take Authorization)
Per 520 ILCS 10/5.5 and 17 Ill. Adm. Code 1080

150-day minimum required for public review, biological and legal analysis, and permitting

PROJECT APPLICANT: *LTF Construction Company, LLC*
2902 Corporate Place Chanhassen, MN 55317

PROJECT NAME: *Life Time Athletic- Commercial development at 880 Old Rand Road, Lake Zurich, Illinois.*

COUNTY: *Lake*

AREA OF IMPACT: *Authorized fill of a 0.98-acre pond located at 880 Old Rand Road, Lake Zurich, Illinois. The pond is non-jurisdictional under Clean Water Act federal regulations and exempt under the Lake County Watershed Development Ordinance.*

The incidental taking of endangered and threatened species shall be authorized by the Illinois Department of Natural Resources (IDNR) only if an applicant submits a conservation plan to the IDNR Incidental Take Coordinator that meets the following criteria:

In each section, text in italics represents the applicant's response to the IDNR requirements shown verbatim in plain or bold text.

1. A description of the impact likely to result from the proposed taking of the species that would be covered by the authorization, including but not limited to -

A) Identification of the **area to be affected** by the proposed action, include a legal description and a detailed description including street address, map(s), and GIS shapefile. Include an indication of ownership or control of affected property. Attach photos of the project area.

The project site is a 10.5-acre parcel located at 880 Old Rand Road in Lake Zurich, Lake County, Illinois. There is a 0.98-acre pond within the parcel designated as an Isolated Waters of Lake County (IWLC). The development will entirely impact this non-high-quality IWLC. It is part of the Fox River Watershed. The property is owned by LFT Real Estate Company Inc. (PIN 14181400001). The property has been approved for development of a fitness center and associated parking lot. The GIS shapefiles are provided.

LFT Real Estate Company Inc. and LFT Construction Company LLC are affiliated companies with LFT Real Estate Company Inc. being the property owner of record and LFT Construction Company LLC being the applicant for this permit who will be responsible for construction of the facility and implementation of this Conservation Plan.

B) **Biological data** on the affected species including life history needs and habitat characteristics. Attach all biological survey reports.

Banded Killifish (Fundulus diaphanus)

An IDNR EcoCAT response letter dated December 10, 2016 is provided as Attachment A which provided consultation termination with a determination of no adverse effects to any state-listed resources likely.

There is no historic record of banded killifish occurring within or in the local vicinity of Lake Zurich, the nearest lake, per the IDNR (Frank Jakubicek).

The IDNR (Frank Jakubicek) identified the banded killifish (Fundulus diaphanus) during a site survey to identify the fish species present in the subject pond. The site survey was a result of LTF Construction Company LLC's coordination with the IDNR Fisheries Biologist in preparation to perform salvage of aquatic life as required per Illinois Administrative Code, Title 17, Chapter 1, Subchapter B, Part 860.

The banded killifish is a member of the topminnow family, Fundulidae. The species is listed as state-threatened in Illinois (IESPB 2015). The banded killifish is typically found in clear, glacial lakes, streams or rivers. Typical size is approximately 3 inches. It shows an olive-green coloration on the back and upper sides and a silver-white color below. Ten to 20, dark, vertical bars can be seen along the sides. They are non-migratory, and spawning occurs in late spring and early summer. They primarily eat aquatic invertebrates throughout the water column. During the day, the fish are found in shallow water. At night, they move to deeper areas.

Two subspecies have been recognized: the eastern banded killifish (Fundulus diaphanus diaphanus) and the western banded killifish (Fundulus diaphanus menona). In addition, the banded killifish is known to exhibit genetic variation of the two subspecies within and among populations. The western banded killifish is the subspecies that is considered native in northeastern Illinois. The eastern banded killifish has been introduced to the area through various methods. Recent population recovery of the species may be directly attributed to the expansion of the eastern banded killifish or examples with hybrid genetic characteristics.

The IDNR, the Illinois Natural History Survey, and The Field Museum worked collaboratively to collect some specimens from the site for genetic analysis to determine which subspecies was present. The results indicate that they are the western subspecies, which is considered native to northeastern Illinois. This result is somewhat unexpected as this small man-made pond is not considered typical or suitable habitat for this sub-species.

An email and datasheet from Frank Jakubicek, IDNR, is attached (Attachment B) and provides the information on both the initial discovery of the species, and the return to collect specimens for the genetic analysis. Based on this information, it appears that other than an unusually dense population of the banded killifish, there was little other fish diversity present. The lack of predatory fishes may explain the high density of the killifish.

C) Description of project activities that will result in taking of an endangered or threatened species, including practices to be used, a timeline of proposed activities, and any permitting reviews, such as a USFWS biological opinion or USACE wetland review. Please consider all

potential impacts such as noise, vibration, light, predator/prey alterations, habitat alterations, increased traffic, etc.

The presence of the banded killifish was discovered during preparation for a salvage operation. Construction of the site including the filling of the pond (0.98 acre) was approved under permit IWLC-18-147. The IDNR identified/confirmed the unexpected presence of this state-threatened fish species. Therefore, the IDNR has advised that the Illinois Endangered Species Act requires that an ITA be obtained before proceeding further with the project.

Project plans call for the demolition of all existing structures on the property. This will facilitate grading the site and construction of a fitness center, associated pool and deck area, and parking and driveways. The grading will include filling the pond in with earthen material to create a level surface for construction of the parking and pool/deck areas. This will inherently eliminate all aquatic habitat on the site.

Construction is underway on portions of the property that do not affect the pond, and the pond is protected with a silt fence barrier. Once an Incidental Take Authorization is granted, all fish will be removed from the pond. They will be collected using seine nets and other means as directed by IDNR fisheries. It is acknowledged that this species does not respond well to electroshocking. The pond may be drained via pumping to facilitate collection of all fish present.

D) Explanation of the anticipated **adverse effects on listed species**; how will the applicant's proposed actions impact each of the species' life cycle stages.

This pond is not considered typical habitat for this sub-species of fish. To avoid impacts to the species, all of the banded killifish population will be relocated to an appropriate location prior to the filling (elimination) of the ponds. The location will be determined by the IDNR fisheries staff based on their knowledge of the species, its occurrence in other lakes, and their habitat requirements. Thus, the only adverse effects would be if any individuals of this species are missed during the relocation and they remain in the pond during filling operations; or if there is any stress induced mortality during transport. The chances of any of the fish remaining in the pond will be reduced by the small size of the pond, and a careful salvage operation in coordination with the IDNR utilizing multiple methods to ensure capture of all of the fish. The IDNR will assist in ensuring safe transport of the fish to the selected habitat.

2) Measures the applicant will take to minimize and mitigate that impact and the funding that will be available to undertake those measures, including, but not limited to -

A) Plans to **minimize the area affected** by the proposed action, the estimated **number of individuals** of each endangered or threatened species that will be taken, and the **amount of habitat** affected (please provide an estimate of area by habitat type for each species).

This project is very unusual in that it received IDNR EcoCAT a determination of no likelihood of adverse effects to any resources of concern. In preparation for a fish salvage, IDNR fisheries staff discovered/confirmed the presence of this listed species in what is a very atypical pond habitat for the banded killifish. Based on the small size of this pond (0.98 acres) and the fact that this pond is not the typical glacial lake habitat for this species, it is not desirable to minimize the area affected by the proposed project. While it is not known how the fish got into this small pond,

they could reach the pond naturally (duck's feet) or by deliberate introduction by people. In any case, all aquatic habitat (0.98 acres) on the property will be eliminated.

It was estimated that up to 2000 banded killifish may be present in the pond, based on a single 30-foot seine haul by IDNR that resulted in a catch of 93 killifish. While every effort will be made to capture and translocate every individual, it is estimated that up to 5% of them may be missed during the fish salvage operation, or otherwise harmed during capture and transport to a new habitat. This would amount to 100 individual fish as the maximum estimated take.

The fish salvage and translocation to a more suitable habitat as directed by the IDNR will minimize any take or harm to the species. In fact, it is possible and even likely that if these fish remained in this small atypical habitat pond, they would not survive due to temperatures, a lack of prey base, low oxygen, or other factors. Therefore, translocating them out of this 0.98-acre isolated surface water pond to another more suitable habitat is a benefit to the species.

Since the killifish present in this pond have proven to be the native western subspecies through genetic analysis, they will be translocated to a glacial lake in the vicinity that is known to have suitable habitat conditions. The IDNR will consider and advise as to the best location which will also consider conservation genetics when introducing these individuals from an isolated population into an existing native population. This consideration may result in the translocation to multiple lakes.

B) Plans for management of the area affected by the proposed action that will enable continued use of the area by endangered or threatened species by maintaining/re-establishing suitable habitat (for example, native species planting, invasive species control, use of other best management practices, restored hydrology, etc.).

This project is very atypical in this ITA process, and enabling the continued use of this small 0.98 acre pond by this species, which is typically found in glacial lakes, is not a project goal nor is it desirable for the species. The banded killifish will not continue to persist within this small pond as the pond will be filled in and all 0.98 acres of aquatic habitat will be eliminated.

C) Description of all measures to be implemented to avoid, minimize, and mitigate the effects of the proposed action on endangered or threatened species.

- Avoidance measures include working outside the species' habitat.
- Minimization measures include timing work when species are less sensitive or reducing the project footprint.
- Mitigation is additional beneficial actions that will be taken for the species such as needed research, conservation easements, propagation, habitat work, or recovery planning.
- It is the applicant's responsibility to propose mitigation measures. IDNR expects applicants to provide species conservation benefits 5.5 times larger than their adverse impact.

This project had received all relevant permits and approvals, including IDNR EcoCAT signoff, and it was not expected to find a listed fish species when conducting a Village-required salvage of any native or sport fish in this small pond. The pond is not considered typical or appropriate habitat for this species. Therefore, impacts to this 0.98-acre pond with a population of banded killifish will not be avoided. Impacts to the pond habitat will not be minimized – the pond will be filled in to facilitate redevelopment. The pond was not considered jurisdictional under the USACE regulatory program and was considered exempt under the Lake County Watershed Development Ordinance.

Impacts to the species will be minimized, through the translocation described above. This will allow the fish to thrive in a habitat more suitable to their typical life requirements.

LTF Construction Company LLC will contribute \$5200 to the Illinois Wildlife Preservation Fund as mitigation, to bring conservation benefit to this species of fish.

D) Plans for **monitoring** the effects of the proposed actions on endangered or threatened species, such as **species and habitat monitoring** before and after construction, include a plan for follow-up **reporting to IDNR**.

No post-construction monitoring for the species will be conducted at the project site due to the removal of all aquatic habitat. The success of the relocation to more suitable habitat will be reported to the IDNR, though it is anticipated that IDNR fisheries staff will be instrumental in the relocation and will be the ones handling any of the killifish.

E) **Adaptive management practices** that will be used to deal with changed or unforeseen circumstances that effect on endangered or threatened species. Consider environmental variables such as flooding, drought, and species dynamics as well as other catastrophes. Management practices should include contingencies and specific triggers. Note: Not foreseeing any changes does not qualify as an adaptive management plan.

Given the unusual circumstance of this project and the concomitant ITA process, adaptive management will be of limited use. But the fundamentals of the feedback loop from monitoring data to management tasks will be used to the extent practicable in the monitoring and management of the population in the lake they are translocated to.

F) **Verification that adequate funding exists** to support and implement all mitigation activities described in the conservation plan. This may be in the form of bonds, certificates of insurance, escrow accounts or other financial instruments adequate to carry out all aspects of the conservation plan.

LTF Construction Company, LLC will provide support for the fish translocation effort to minimize impacts to the species and contribute \$5200 to the Illinois Wildlife Preservation Fund as mitigation. LTF will make this contribution at such time as directed by the IDNR.

3) A **description of alternative actions the applicant considered** that would reduce take, and the reasons that each of those alternatives was not selected. A **“no-action” alternative** shall be included in this description of alternatives. Please, describe the economic, social, and ecological tradeoffs of each action.

The no-action alternative would leave the existing pond in place and new development would not take place on this property. The property is already in a suburban context and was previously developed. The no-action alternative may result in the demise of this listed fish in this small pond, since it is not typical habitat and not anticipated to provide adequate life cycle requirements. The no-action alternative would not provide any redevelopment of this parcel, a goal for local land planning to reduce impacts from traditional green field development.

Other practicable alternatives do not seem available, as the project had already received all necessary approvals prior to the discovery of this species on the site. Removal and translocation are the only alternative available that allows the approved project to proceed, while minimizing impacts to the species.

4) Data and information to indicate that the proposed taking will not reduce the likelihood of the survival of the endangered or threatened species in the wild within the State of Illinois, the biotic community of which the species is a part, or the habitat essential to the species existence in Illinois.

The banded killifish population in the Midwest and northeastern Illinois has been increasing in recent years. However, it is now thought that this may be partially due to the introduction of the eastern subspecies into Ohio and Pennsylvania from where they've expanded their range. In addition, there are intergrades of the two sub-species being detected at various locations. The native species remains present in several Illinois glacial lakes.

Even with the genetic differentiation, there are numerous other locations that harbor the native glacial lakes subspecies and, therefore, this project will not reduce the likelihood of the survival in the wild in Illinois.

5) An implementing agreement, which shall include, but not be limited to (on a separate piece of paper containing signatures):

- A) The names and signatures of all participants in the execution of the conservation plan;
- B) The obligations and responsibilities of each of the identified participants with schedules and deadlines for completion of activities included in the conservation plan and a schedule for preparation of progress reports to be provided to the IDNR;
- C) Certification that each participant in the execution of the conservation plan has the legal authority to carry out their respective obligations and responsibilities under the conservation plan;
- D) Assurance of compliance with all other federal, State and local regulations pertinent to the proposed action and to execution of the conservation plan;
- E) **Copies of any final federal authorizations for a taking already issued to the applicant, if any.**

See attached Implementing Agreement.

PLEASE SUBMIT TO: Incidental Take Authorization Coordinator, Illinois Department of Natural Resources, Division of Natural Heritage, One Natural Resources Way, Springfield, IL, 62702 OR DNR.ITAcordinator@illinois.gov

Implementation Agreement

Banded Killifish Translocation from 0.98-acre Pond

Lake Zurich, Lake County, Illinois.

- A) The **names and signatures** of all participants in the execution of the conservation plan;

See certification clause below.

- B) The **obligations and responsibilities** of each of the identified participants with schedules and deadlines for completion of activities included in the conservation plan and a **schedule for preparation of progress reports** to be provided to the IDNR;

Applicant/Permittee Responsible:

Chase Norton, Project Manager
LTF Construction Company, LLC
2902 Corporate Place - Chanhassen, MN 55317
952.229.7521

The schedule will be to proceed as soon as possible upon authorization. A progress report will be prepared and submitted to the IDNR upon completion of the pond draining and fish relocation.

- C) Certification that each participant in the execution of the conservation plan has the **legal authority** to carry out their respective obligations and responsibilities under the conservation plan;

See certification clause below.

- D) **Assurance of compliance** with all other federal, State and local regulations pertinent to the proposed action and to execution of the conservation plan;

See certification clause below.

- E) Copies of any final **federal authorizations for a taking** already issued to the applicant, if any.

No federal permits for Take have been requested or issued since no federally listed species are involved.

CERTIFICATION: LTF Construction Company, LLC hereby certifies that it has the authority and funding to complete the project and to address the issues proposed in this Incidental Take Conservation Plan for the state-listed banded killifish. LTF Construction Company, LLC is in charge of the project and will assure that all applicable state, federal, and local laws will be adhered to during the completion of the project.

Chase Porto

DATE:

5/29/2019

Project Number: 19-0155

Hey and Associates, Inc.
Engineering, Ecology and Landscape Architecture

Project Name:
Old Rand Road-Lake Zurich

Attachment Title: Attachment:
IDNR EcoCAT Letter A



Illinois Department of Natural Resources

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

Bruce Rauner, Governor

Wayne Rosenthal, Director

December 17, 2016

Taylor Corbin
Manhard Consulting, Ltd.
116 W Illinois Street, 7th Floor
Chicago, IL 60654

RE: Fitness center development
Project Number(s): 1701693
County: Lake

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.

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.

Natalia Jones
Division of Ecosystems and Environment
217-785-5500

Project Number: 19-0155

Hey and Associates, Inc.
Engineering, Ecology and Landscape Architecture

Project Name:
Old Rand Road-Lake Zurich

Attachment Title: Attachment:
Jakubisek IDNR Email B

Jeff Mengler

From: Jakubicek, Frank <Frank.Jakubicek@Illinois.gov>
Sent: Thursday, May 30, 2019 10:36 AM
To: Jeff Mengler
Subject: Re: Lake Zurich banded killifish
Attachments: Banded killifish 2 Lifetime Fitness Pond 2019.JPG; Banded killifish Lifetime Fitness Pond 2019.JPG

Hi Jeff,

Attached is the datasheet for our seine haul on May 6, 2019 to collect specimens for genetic analysis. The fish species I've either collected or observed in this pond include: Banded killifish, Black bullhead.

On April 25, 2019 my technician and I stopped by the Lifetime Fitness location and used long handle dipnets to collect the first Banded killifish. We dipped three times in shallow water and collected about 6 fish. At that time we observed 2 sunfish in the shallows (probably green sunfish but they were not collected). Those photos are included.

Relative to how many Banded killifish are present in the pond, my guess would be a couple thousand. A single 30 foot seine haul resulted in a catch of 93 killifish. Phil mentioned, following our sampling event that the most killifish he's ever seined up at once was closer to 40 fish so this pond appears to have a "very dense" population of killifish.

Take would include mortality during sampling, transport and those left behind.

No fish have been transported or relocated to other locations (other than the 10 fish Phil and I collected for genetic analysis).

Let me know what else you need to move this forward, FJ

Frank Jakubicek
IDNR - District Fisheries Biologist
8916 Wilmot Road
Spring Grove, IL 60081
Office: 815/675-2319
Work Cell: 815/529-2723

From: Jeff Mengler <jmengler@heyassoc.com>
Sent: Wednesday, May 29, 2019 2:20:45 PM
To: Jakubicek, Frank
Subject: [External] RE: Lake Zurich banded killifish

Also – do you have an estimate as to how many killifish were present in the pond? And based on that, what would be your estimate of take? I'm assuming the causes of take would be any fish we miss during the collection at the pond, and then any that die during transport.

Thanks,

Jeffrey L. Mengler, PWS
Senior Project Scientist

Hey and Associates, Inc.

847-740-8228 (direct)
847-740-0888 x123
815.451.8352 (mobile)



From: Jeff Mengler
Sent: Wednesday, May 29, 2019 12:49 PM
To: Jakubicek, Frank <Frank.Jakubicek@illinois.gov>
Subject: Lake Zurich banded killifish

Frank:

We've gotten some comments back from Jenny on our draft ITA application for the killifish in our little pond in Lake Zurich. And I'll need your help on some things. She's asked for any datasheets from the fish salvage when these killifish were discovered. Do you have anything you can share (so we can submit it back to the IDNR)? I wasn't there so I'll need something from someone who was. She wants to know what species of fish were observed, if any were moved to another body of water, etc. As I recall, you said it was kind of weird in that you didn't see much in the way of other fish, but we'll need something in writing that quantifies it in some way.

There may be some other things as I work through this.

Has there been a decision on where you want these fish moved to?

Thanks,

Jeff

Jeffrey L. Mengler, PWS
Senior Project Scientist

Hey and Associates, Inc.

26575 W. Commerce Drive, Suite 601
Volo, Illinois 60073
847-740-8228 (direct)
847.740.0888 Ext. 123
815.451.8352 (Mobile)
heyassoc.com



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Project Number: 19-0155

Hey and Associates, Inc.
Engineering, Ecology and Landscape Architecture

Project Name:
Old Rand Road-Lake Zurich

Attachment Title:
Public Notice

Attachment:
C

PUBLIC NOTICE

Local Newspaper as required:

Notice to appear once a week for 3 consecutive weeks

TO BE IDENTIFIED by Lifetime.

State Newspaper as Required:

Published once, coinciding with first publication date in the local newspaper:

In most cases, copy must be received by mail three (3) days before the first insertion date.

State Newspaper Contact Information:

Marylee Razar
Breeze Printing Co.
P.O. Box 440
212 South Main Street
Taylorville, IL 62568,

Subscriptions: 217-824-2233

[E-mail Subscriptions](#)

Legal Notices Department Telefax: 217-824-2026

[E-mail Legal Notices Department](#)

Hard Copies to nearest Public Library as Required:

Ela Area Public Library (1.6 miles)
275 Mohawk Trail
Lake Zurich, IL 60047

Must also be sent to:

Executive Director
Illinois Endangered Species Protection Board
One Natural Resources Way
Springfield, IL 62702-1271

NOTICE

Notice is hereby given seeking public comment on an application by LTF Construction Company, LLC for an Incidental Take Authorization for possible impacts to the state-threatened Banded Killifish in unincorporated Lake County.

Applicant Contact Information:
LTF Construction Company, LLC.
2902 Corporate Place
Chanhassen, MN 55317

The applicant has filed a Conservation Plan in accordance with Illinois Administrative Code, Chapter I, Section 1080 which is available for review at the following public library:

Ela Area Public Library
275 Mohawk Trail
Lake Zurich, IL 60047

The Conservation Plan will also be available for review on the Illinois Department of Natural Resource's webpage at:

<https://www.dnr.illinois.gov/conservation/NaturalHeritage/Pages/Incidental-Take-Authorizations.aspx> (reference #204).

Description of Proposed Action

LTF Construction Company, LLC is proposing to redevelop a parcel at the northeast corner of Old Rand Road and Rand Road (Route 12) in Lake Zurich with a state-of-the-art fitness center (see map). This will include a parking lot and other related facilities.

The banded killifish (*Fundulus diaphanus*) is an Illinois threatened species of fish. The presence of the banded killifish was unexpectedly discovered by Illinois Department of Natural Resources (IDNR) during a fish salvage operation of a 0.98-acre pond as required by the Village of Lake Zurich prior to any filling for construction. The habitat is not considered typical or suitable for the banded killifish.

Two subspecies of the banded killifish have been recognized: the eastern banded killifish (*Fundulus diaphanus diaphanus*) and the western banded killifish (*Fundulus diaphanus menona*). The western banded killifish is the subspecies that is considered native in northeastern Illinois. The eastern banded killifish has been introduced to the area through various methods from further east. Genetic testing revealed that the fish in this small (0.98-acre) pond is the western banded killifish. To minimize impacts to the species, the banded killifish in this pond will be relocated to a more suitable habitat (glacial lakes) at the direction of the IDNR given that this pond is not considered suitable habitat.

The applicant proposes required mitigation for any potential incidental impacts to the banded killifish in the form of a contribution of \$5,200 to the Illinois Wildlife Preservation Fund to benefit the conservation of this listed species.

Comments on this Conservation Plan and proposed Incidental Take Authorization should be provided to:

Illinois Department of Natural Resources
Office of Resource Conservation
Incidental Take Authorization Coordinator
One Natural Resources Way
Springfield, IL, 62702
OR
DNR.ITAcoordinator@illinois.gov.

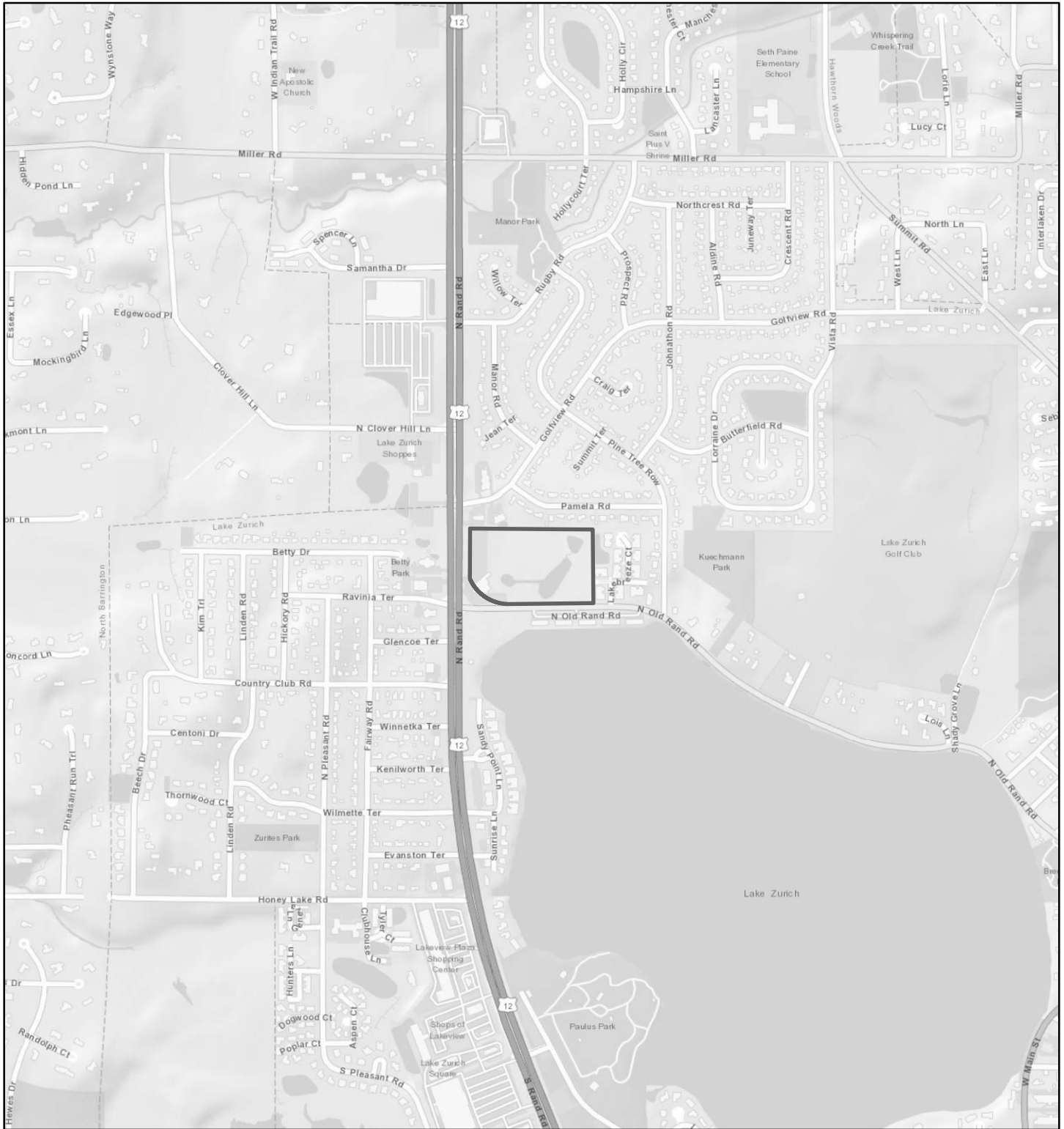
The final date that comments will be accepted regarding this application will be July 27, 2019.

Project Number: 19-0155

Hey and Associates, Inc.
Engineering, Ecology and Landscape Architecture

Project Name:
Old Rand Road-Lake Zurich

Attachment Title: **Site Location Map** Attachment: **D**



Scale:



Project Number: 17-0257

Orientation:



Date: 5/15/2019

Legend:



Project Name:

Old Rand Road-Lake Zurich

Prepared for:

Manhard Consulting, Ltd.

Location Information:

T.43N.-R.10E., Section 18

Prepared by:

Hey and Associates, Inc.
Engineering, Ecology and Landscape Architecture

Exhibit Title:

Project Location

Exhibit:

1