

**Operational Monitoring at the
Hoopeston Wind Project
Vermilion County, Illinois**

April – October 2022



**Prepared for:
Hoopeston Wind, LLC**

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EXECUTIVE SUMMARY

Western EcoSystems Technology, Inc. estimated bat fatalities during the active bat season (spring, summer, and fall) of 2022 at the Hoopeston Wind Project (Project) located in Vermilion County, Illinois. Methods used to monitor and estimate the number of fatalities were consistent with the Hoopeston Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP) TE54252C-0 for Indiana bats and northern long-eared bats. The study objectives were to estimate Indiana bat and northern long-eared bat take and determine if adaptive management was triggered.

Annual monitoring in 2022 consisted of weekly searches of roads and pads at all turbines from April 1 to October 15, 2022, per the HCP. Indiana bat and northern long-eared bat mortality was estimated using the Species Composition Approach and Evidence of Absence (EoA) framework, as described in the HCP. Overall bat fatality estimates for the entire study were calculated using the General Estimator or GenEst and used to estimate the Species Composition Approach estimates, as agreed upon with US Fish and Wildlife Service (USFWS). Searcher efficiency and area adjustment estimates used to determine the overall bat fatality and EoA estimates were calculated from data collected during intensive monitoring in 2018 – 2020, as outlined in the HCP. There was substantial annual variability in carcass persistence rates during the first three years of intensive monitoring; therefore, carcass persistence trials were conducted in 2022 per the HCP and in coordination with USFWS.

No Indiana bats or northern long-eared bats, or any other federally or state-listed bat or bird species, were found during the study or incidentally. The EoA framework estimated that zero Indiana bats and zero northern long-eared bats were taken during 2022, using the 50% credible bound of the posterior mortality distribution. Similarly, take estimates for 2022 using the Species Composition Approach and based on GenEst were zero for both species.

Within the three-year adaptive management evaluation period, the estimated fatality rates of Indiana bat and northern long-eared bat take were below the levels authorized by the ITP, using EoA estimates and/or Species Composition Approach. Similarly, the projected level of take for the remainder of the Project operation is lower than limits authorized in the ITP, assuming similar levels of mortality in future years. Therefore, no adaptive management was triggered to reduce potential take of Indiana or northern long-eared bats.

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INTRODUCTION

Western EcoSystems Technology, Inc. (WEST) completed operational post-construction fatality monitoring during the active bat season (spring, summer, and fall) of 2022 at the Hoopeston Wind Project (Project) in Vermilion County, Illinois. The monitoring was completed in accordance with the Hoopeston Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP) TE54252C-0 for Indiana bats (*Myotis sodalis*) and northern long-eared bats (*M. septentrionalis*). This was the fifth year of monitoring under the Project's ITP. The study objectives were to estimate Indiana bat and northern long-eared bat take using the Species Composition Approach and Evidence of Absence (EoA) framework as outlined in the HCP, and determine if adaptive management was triggered.

PROJECT DESCRIPTION

The Project is in the Central Corn Belt Plains Ecoregion, which encompasses a large portion of central Illinois (Woods et al. 2007). This ecoregion is composed primarily of vast glaciated plains. Tall-grass prairie originally dominated much of the region, and scattered groves of trees and marshes occurred on level uplands. Today, the dominant land use within the Project is tilled agriculture, consisting primarily of corn (*Zea mays*), soybeans (*Glycine max*), and winter wheat (*Triticum* spp.). In addition, there are scattered residences, and small areas of pasture, grasslands, and shelterbelts (Figure 1; National Land Cover Database 2019). Fatality monitoring was completed at 100% of the turbines, as shown in Figure 1 and as described in the *Methods* section below.

The Project is composed of 49 2.0-megawatt (MW) wind turbines capable of generating up to 98 MW. All turbines are V 100 Vestas turbines with a 100-meter (m; 328-foot [ft]) hub height and 49-m (161-ft) blade length.

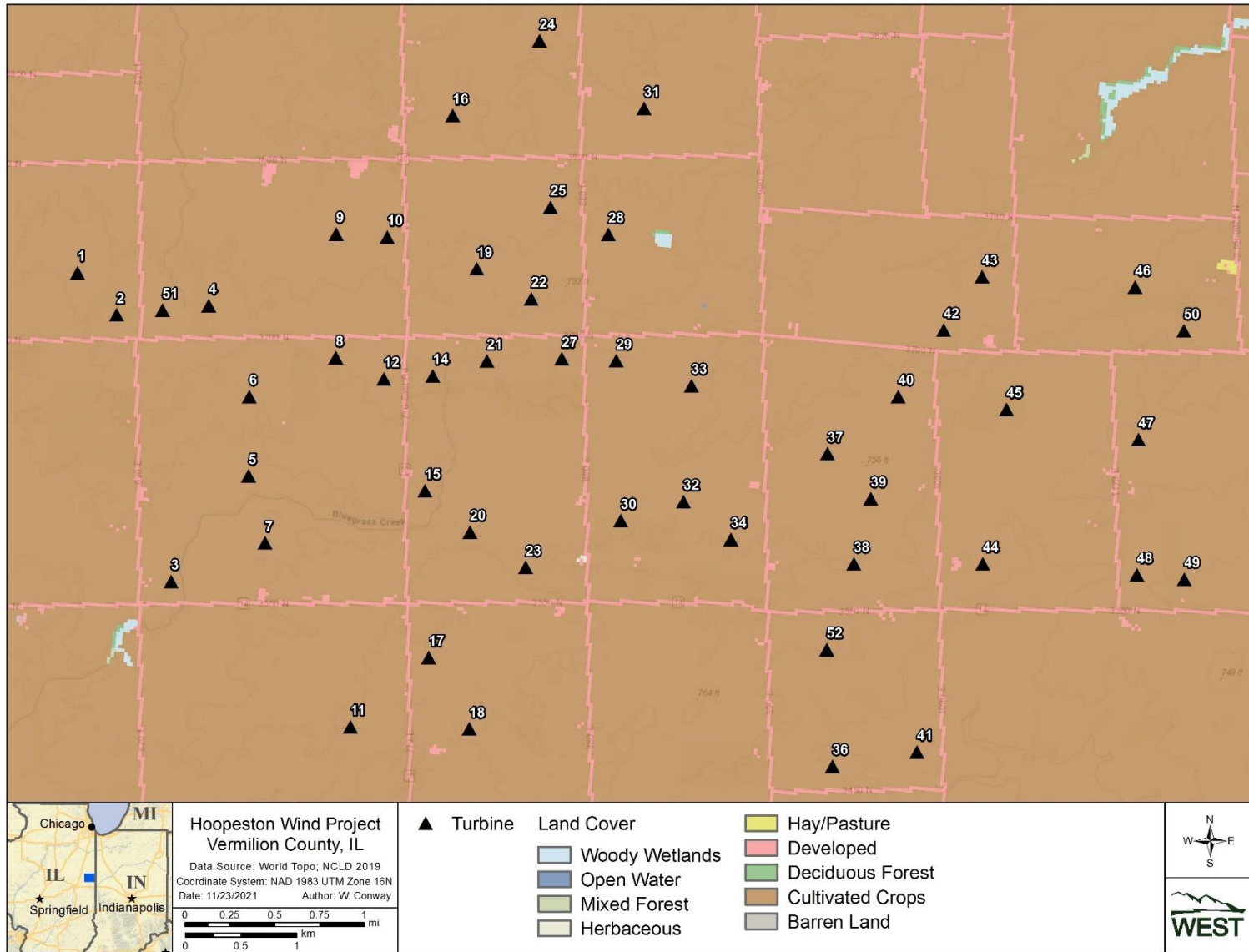


Figure 1. Land cover and turbine layout at the Hoopeston Wind Project in Vermilion County, Illinois.

METHODS

The study contained two field components: standardized carcass searches and carcass persistence trials. Searcher efficiency and area adjustment estimates was determined using data collected from 2018 – 2020, when the Project completed intensive monitoring as outlined in the HCP.

Field Methods

Standardized Carcass Searches

Spring, summer, and fall monitoring was completed in accordance with the monitoring methods described for annual monitoring in the HCP. All carcass searches were conducted by WEST technicians trained to follow the Project's carcass search protocols, including proper handling and reporting of carcasses.

In all seasons, technicians searched the gravel roads and pads at all 49 turbines weekly by starting 95 m (312 ft) from the turbine, walking towards and around the turbine, and then back towards their vehicle. Technicians walked at a rate of approximately 45–60 m (148–197 ft) per minute and scanned the ground out to 2.5 m (8.2 ft) on either side of the transect.

The condition of each carcass found was recorded using the following categories:

- Live/Injured—a live or injured bat or bird
- Intact—a carcass that was completely intact, was not badly decomposed, and showed no sign of being fed upon by a predator or scavenger
- Scavenged—an entire carcass, which showed signs of being fed upon by a predator or scavenger, or a portion(s) of a carcass in one location (e.g., wings, skeletal remains, portion of a carcass), or a carcass that was heavily infested by insects
- Feather Spot (for bird carcasses only)—10 or more feathers (not including down) at one location indicating predation or scavenging

The following information was recorded for each carcass found during standardized surveys:

- Date and time
- Initial species identification
- Sex, and age (if identifiable)
- Geographic coordinate
- Distance and bearing to turbine
- Substrate/ground cover

- Carcass condition (intact, scavenged, injured)
- Estimated time since death (number of days)

Technicians collected bat carcasses in accordance with WEST's Illinois Department of Natural Resources (IDNR) Scientific Permits (2022), WEST's IDNR Endangered and Threatened Species Permits (15131), WEST's US Fish and Wildlife Service (USFWS) Native Endangered and Threatened Species Recovery Permit (TE234121-9), and the Project's ITP (TE54252C-0). All bats were identified in the field and all identifications were confirmed by a permitted bat biologist (ESPER0039249). Bird carcasses were recorded but left in place, and all bird carcasses were verified by WEST biologists experienced with bird identification via photographs.

Carcass Persistence Trials

There was substantial annual variability in carcass persistence rates from 2018 – 2020 (Rodriguez et al. 2022); therefore, carcass persistence trials were conducted to determine carcass persistence rates in roads and pads search areas for the study, per the Project's HCP. Carcass persistence trials were conducted in the fall, the only season with potential risk to Indiana bat and northern long-eared bat per the HCP, to estimate the average probability that a bat carcass remained in the field from the time of collision to the time of search. Fifteen bats were placed as trial carcasses across two dates to incorporate the effects of varying weather conditions on carcass persistence.

Technicians monitored the trial carcasses over a 28-day period, checking the carcasses on days 1-4, 7, 10, 14, 21, and 28 after placement. Carcasses were left at the location until the carcass was completely removed or the trial period ended. Any remaining evidence of the carcass was removed at the end of the 28-day monitoring period.

Statistical Analysis

Quality Assurance and Quality Control

Quality assurance and quality control (QA/QC) measures were implemented at all stages of the study, including in the field, during data entry and analysis, and report writing. Following field surveys, technicians were responsible for inspecting data forms for completeness and accuracy. Potentially erroneous data were identified using a series of database queries. Irregular codes or data suspected as questionable were discussed with the technician and/or Project Manager. Errors, omissions, or problems identified in later stages of analysis were traced back to the raw data forms, and appropriate changes were made in all affected steps.

Data Compilation and Storage

A Microsoft SQL server database was developed to store, organize, and retrieve survey data. Data were entered into the electronic database using a pre-defined format to facilitate subsequent QA/QC and data analysis. All electronic data files were retained for reference.

Fatality Estimates

Overall bat fatality estimates were calculated for bats using GenEst (a generalized estimator of fatality; Dalthorp et al. 2018, Simonis et al. 2018). Fatality estimates were based on:

- Observed number of carcasses found within standardized search plots during the monitoring period.
- Searcher efficiency rates, expressed as the probability that a carcass was found by searchers during searcher efficiency trials.
- Persistence rates, expressed as the estimated average probability a carcass was expected to persist in the search area and be available for detection by the searchers during carcass searches.
- Area adjustment estimates, expressed as the carcass-density weighted proportion of area searched; this adjustment accounts for carcasses that fell outside of the search areas.

Each carcass included in the analysis was adjusted for searcher efficiency, carcass persistence, a detection reduction factor (also referred to as “ k ”; see below), and a search area adjustment to obtain an overall fatality estimate.

Confidence intervals (CIs) surrounding estimates for each season were calculated using a parametric bootstrap for GenEst (Dalthorp et al. 2018) by season and overall. Bootstrapping is a computer simulation technique that is useful for calculating variances and CIs for complicated test statistics. One thousand bootstrap samples were used. The lower 5th and upper 95th percentiles of the 1,000 bootstrap estimates were estimates of the lower limit and upper limit of 90% CIs.

Carcasses Excluded from Fatality Estimation

All carcasses found within the mapped road and pad search area boundaries were included in the fatality rate estimation if they had an estimated time of death within the season when the search area was monitored (i.e., carcasses found outside of search areas or estimated to have died before the beginning of the season were omitted from the analysis).

Estimation of Searcher Efficiency

Searcher efficiency estimated the probability of a carcass being detected by a searcher given the carcass was available to be found. Searcher efficiency estimates were based on data collected from 2018 – 2020 on roads and pads (Iskali and Pham 2019; Rodriguez et al. 2020, 2021). One hundred thirty-three bat carcasses were placed for human technicians on roads and pads from 2018 – 2020. Similar to 2021, a logistic regression model (Dalthorp et al. 2018) was fit to the 2018 – 2020 data and used to obtain an average estimate of searcher efficiency (Rodriguez et al. 2022).

Detection Reduction Factor

The change in searcher efficiency between successive searches was defined by a parameter called the detection reduction factor (k) that ranged from zero to one. When k is estimated or

assumed to be zero, it implies that a carcass missed on the first search would never be found on subsequent searches. A k of one implies searcher efficiency remained constant no matter how many times a carcass was missed. The detection reduction factor was a required parameter for GenEst, and a value of $k = 0.8$ was used, in accordance with the HCP.

Estimation of Carcass Persistence Rates

Estimates of carcass persistence were used to adjust carcass counts for removal bias. The average probability a carcass persisted through the search interval (i.e., the time between scheduled searches) was estimated using an interval-censored survival regression using one of four distributions: exponential, log-logistic, lognormal, or Weibull (Kalbfleisch and Prentice 2002; Dalthorp et al. 2018). The most parsimonious model within two AICc units of the model with the lowest AICc value was selected as the best model.

Area Adjustment

The search area adjustment accounted for carcasses falling outside of search areas. The proportion of carcasses estimated to have fallen within search areas was calculated as the mean of the area adjustment values on 95-m roads and pads from 2018 – 2020 (Iskali and Pham 2019; Rodriguez et al. 2020, 2021). The result was an estimate of the proportion of bat carcasses expected to land within search areas.

Indiana Bat and Northern Long-Eared Bat Take and Detection Probability Estimates

Fall was the only season with potential risk to the species covered under the HCP; therefore, Indiana and northern long-eared bat fatality estimates were based on fall data using the Species Composition Approach and EoA framework, as outlined in the Project's HCP. ITP compliance was assessed using three metrics for each of the covered species: the annual take rate estimate using the Species Composition Approach, the EoA short-term trigger, and the EoA projected mortality estimate. The Species Composition annual take rate and the EoA short-term trigger were based on the three most recent monitoring years. The EoA projected mortality estimate was constructed by taking the EoA estimate of mortality over the ITP term, and adding in projected mortality for the remainder of the Project term. The predicted future mortality was based on the fatality rate from the three most recent monitoring years.

Species Composition Approach

Indiana bat and northern long-eared bat fatalities were estimated for the fall using the Species Composition Approach. The Species Composition Approach assumes that Indiana bat and northern long-eared bat fatalities can be estimated as a proportion of the total number of bat fatalities at the Project. The HCP specified baseline values for fatalities of Indiana bat and northern long-eared bat as 0.29% and 0.24%, respectively (Hoopston Wind, LLC, 2017); however, the Project proposed updated species composition rates of 0.03% for Indiana bats and 0.06% for northern long-eared bats based on updated, publicly available post-construction monitoring data collected after the spread of white-nose syndrome (Rodriguez and Studyvin 2020). The USFWS approved the use of these updated rates on November 6, 2020 (A. Schorg, USFWS, pers comm.). Therefore, species composition rates were estimated using the updated species composition rates of 0.03% for Indiana bats and 0.06% for northern long-eared bats. An average take estimate

for both Indiana bat and northern long-eared bat was calculated across 2020 – 2022 using the GenEst estimates reported in 2020, 2021 (Rodriguez et al. 2020, 2021), and 2022.

Evidence of Absence

The EoA framework (Dalthorp et al. 2014, 2017) uses a Bayesian model to estimate the actual number of fatalities, the estimated mortality rate (λ), and the cumulative 30-year projected mortality based on λ . The inputs to the model are the number of found carcasses and the g distribution, or the site-wide probability that a carcass was available to be found and detected. The estimate for g was based on:

- The monitoring search schedule, expressed as number of searches and the time interval between the searches.
- Searcher efficiency expressed as the proportion of available carcasses found by searchers (see *Estimation of Searcher Efficiency* on page 5).
- Carcass persistence rates expressed as the estimated average probability a carcass was expected to remain in the study area (see *Estimation of Carcass Persistence Rates* on page 6).
- Search area adjustment based on the estimated carcass-density distribution weighted by the proportion of area searched (see *Area Adjustment* on page 6).
- Detection reduction factor (k), expressed as the fraction to which searcher efficiency was reduced with each successive search (see *Detection Reduction Factor* on page 6). The factor k was assumed to equal 0.8, as outlined in the HCP.

The site-wide probability of detection (g) in each year was estimated using the Single Class Module from the EoA software (Dalthorp 2019). Estimates in 2022 included only the fall and a single plot type or single stratum (road and pad areas). Therefore, the Multiple Class Module in EoA was not necessary to combine across strata.

EoA projections of mortality into the future rely on the ITP-to-date estimated total take, plus the annual take rate estimated using the three most recent monitoring years' data. Therefore, two probabilities of detection for EoA were required: the rolling average probability of detection over the past three years of monitoring and the cumulative average probability of detection over the past five years.

Rolling Average Probability of Detection

The HCP specifies that the fatality rate of Indiana bat and northern long-eared bat is tested based on a rolling-average detection probability including the most recent three years of monitoring events. At present, that monitoring window includes 2020 – 2022. Detection probabilities from 2020 – 2022 were combined into the rolling average detection probability using the per-study g estimates and the relative weights (p) for each study (Dalthorp et al. 2017). This detection probability was used to estimate the rolling average take rate based on the monitoring data

available from 2020 – 2022. Beginning in year four of the permit (2021 study) and beyond, the EoA annual take rate trigger was evaluated as a hypothesis test. The hypothesis test evaluates whether the annual take rate exceeded the expected take rate (two bats per year) at 90% confidence (i.e., $\Pr(\lambda > 2) > 0.9$), which equates to a one-sided hypothesis test at $\alpha = 0.1$. EoA generates a posterior distribution for the annual take rate estimate, which was used to test the hypothesis. The full posterior distribution was also used in the EoA mortality projection tool, by drawing samples from the distribution to propagate uncertainty via Monte Carlo simulation (see *Projected Mortality for the Remainder of the Project Incidental Take Permit*, below).

Cumulative Probability of Detection

The HCP does not require estimates of cumulative mortality to date (M^*). However, the EoA mortality projection tool used the posterior distribution of M as the starting point for simulations. Therefore, detection probabilities from 2018 – 2022 were combined into the cumulative (to date) detection probability using the per-year g estimates and the relative weights (ρ) for each year (Dalthorp et al. 2017). This detection probability was used in the EoA mortality projection tool.

Projected Mortality

The Multiple Years Module was used to calculate the annual take rate (λ), the cumulative mortality (M^*), and projected mortality. The Multiple Years Module requires the Beta distribution parameters for detection probability in each year and weights (ρ), which were all assumed to be one because there were no changes in facility operations (such as cut-in speed) that would have resulted in different weights. The rolling average probability of detection was used to estimate the annual take rate. The cumulative probability of detection was used to estimate the cumulative mortality to date.

The EoA Multiple Years Module used a Monte Carlo simulation approach to project future cumulative mortality. Current estimated take was simulated as 10,000 samples from the estimated posterior distribution for cumulative take to date (M from EoA). Future take was simulated using 10,000 samples from the posterior distribution of the annual take rate that was estimated using the previous three years (2020 – 2022). Each of the 10,000 annual take rate samples were applied for the remaining 25 years of the permit term and mortality in each year was sampled from a Poisson distribution with the annual take rate specified as the rate parameter. Simulated mortality in each year were summed over the 25 years, resulting in 10,000 realizations of projected mortality from year 2023 to the end of the permit term. The vector of current take estimate samples and the vector of projected mortality samples were summed element-wise to generate a 10,000 sample distribution of cumulative mortality at the end of the permit term. The median of this distribution was used to evaluate an adaptive management trigger. The EoA mortality projection tool provided projections of actual mortality (i.e., how many fatalities are expected to occur at the Project in each year) and projections of estimated take (i.e., how many fatalities would be estimated by EoA in each year, given a pre-defined detection probability and the projection of actual mortality). Projections of estimated take require inputting detection probabilities for future years and are not relevant for ITP compliance. Therefore, only the projections of actual mortality were used.

RESULTS

Standardized Carcass Searches

A total of 1,339 searches of roads and pads were completed from April 1 to October 15, 2022. Thirty-one searches (2.3%) were missed due to turbine maintenance, site conditions, and weather constraints.

No Indiana bat or northern long-eared bat carcasses, or carcasses of other federally or state-listed as threatened or endangered bat or bird species, were found during the study. Details of all carcasses found during the study are presented in Appendix A.

Overall Fatalities

Twenty-one bat carcasses belonging to four species were found during scheduled carcass searches. Eastern red bat (*Lasiurus borealis*; n = 11, 52.4%) was the most common species fatality, followed by silver-haired bat (*Lasionycteris noctivagans*; n = 6, 28.6%), hoary bat (*Lasiurus cinereus*; n = 3, 14.3%), and big brown bat (*Eptesicus fuscus*; n = 1, 4.8%). In addition, four bird carcasses of three known species and one species group were found during the study (Table 1).

Table 1. Total number of carcasses and percent (%) composition of carcasses discovered at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 to October 15, 2022.

Species	Included in GenEst Fatality Estimate		Outside Search Area ¹		Outside Study Period ¹		Total	
	Total	%	Total	%	Total	%	Total	%
eastern red bat	11	52.4	0	0	0	0	11	52.4
silver-haired bat	6	28.6	0	0	0	0	6	28.6
hoary bat	3	14.3	0	0	0	0	3	14.3
big brown bat	1	4.8	0	0	0	0	1	4.8
Overall Bats²	21	100	0	0	0	0	21	100
American robin	0	0	0	0	0	0	1	25.0
mourning dove	0	0	0	0	0	0	1	25.0
unidentified warbler	0	0	0	0	0	0	1	25.0
house sparrow	0	0	0	0	1	100	1	25.0
Overall Birds^{2,3}	0	0	0	0	1	100	4	100

¹ Carcasses were not included in the analysis.

² Sums may not equal total values shown due to rounding.

³ Birds were not included in the fatality estimates.

Carcasses for Analysis

All bat carcasses were found within the search area and during the study period; therefore, all bat carcasses were included in the analysis.

Timing and Distribution of Bat Fatalities

The majority of bat carcasses were found between the end of July and mid-September (Figure 2; Appendix A). The composition of bat fatalities varied by season; only the silver-haired bat was

found in the spring, two additional species were found in both the summer and fall (eastern red bat and hoary bat), and one additional species was found in fall (big brown bat; Table 2).

Table 2. Species composition by season for bat carcasses found at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 to October 15, 2022.

Species	Spring		Summer		Fall	
	# of Carcasses	%	# of Carcasses	%	# of Carcasses	%
eastern red bat	0	0	6	75	5	41.7
silver-haired bat	1	100	0	0	5	41.7
hoary bat	0	0	2	25	1	8.3
big brown bat	0	0	0	0	1	8.3
Total¹	1	100	8	100	12	100

¹ Sums may not equal total values shown due to rounding.

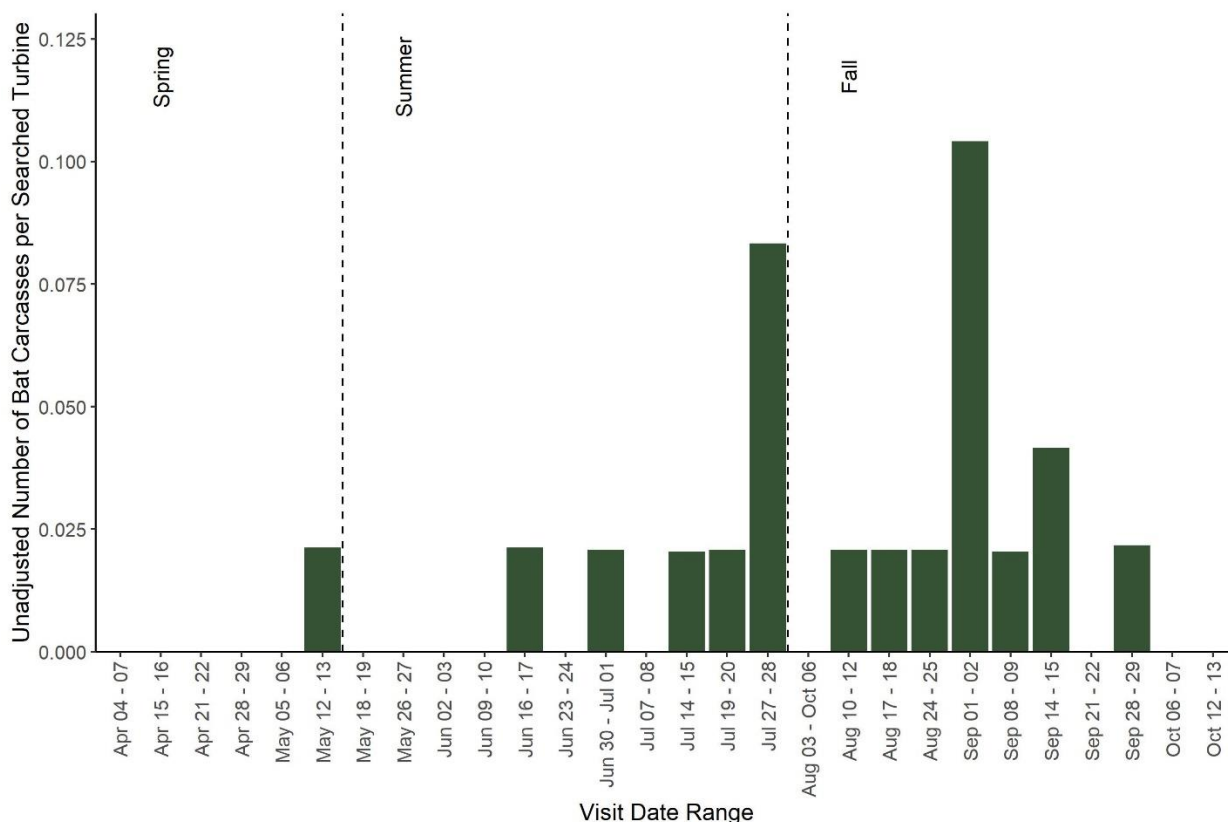


Figure 2. Timing of bat carcasses for carcasses included in the GenEst fatality estimates at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 to October 15, 2022.

Bat carcasses were found at 17 of the 49 study turbines. Two bat fatalities were recorded at turbines 2, 10, 11, and 23, which are all located on the western half of the Project. Thirteen additional turbines had one bat fatality each and were distributed evenly across the Project. The low overall fatality rate makes it difficult to distinguish spatial patterns.

Searcher Efficiency Trials

The estimated searcher efficiency rate from road and pad searches, which was used in determining fatality and take estimates, was 0.95 (90% CI: 0.90–0.97; Rodriguez et al. 2022; Appendix B1).

Carcass Persistence Trials

Fifteen bat carcasses were placed during the fall of 2022 for persistence trials and used to estimate carcass persistence rates. The best-fit model was an exponential distribution (Appendix B1). The estimated median bat carcass persistence time was 5.87 days (Appendix B2). The average probability that a bat carcass persisted through a 7-day search interval was 0.673 (90% CI: 0.56–0.78).

Area Adjustment Using Project-Specific Data

There were no turbines with routinely unsearchable areas. The mean area adjustment from 2018 – 2020 was estimated in 2021 and indicated that approximately 6% of bats fell within the search area of the roads and pads (Rodriguez et al. 2022).

Adjusted Overall Bat Fatality Estimates

Bat fatality estimates were calculated for the year, per the HCP. Fatality estimates were highest in the fall, and the overall estimate for the study was 5.20 bats per MW (90% CI: 3.33–7.64; Table 3). Inputs used to calculate fatality estimates are presented in Appendix C.

Table 3. Seasonal and overall bat fatality rates per turbine and megawatt (MW) using GenEst for studies conducted at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 to October 15, 2022.

Season	Bat Fatality Estimate per Turbine	90% Confidence Interval	Bat Fatality Estimate per MW	90% Confidence Interval
Spring	0.48	NA*	0.24	n/a*
Summer	3.80	1.87–6.85	1.90	0.93–3.43
Fall	5.83	3.30–9.42	2.91	1.65–4.71
Overall	10.41	6.66–15.28	5.20	3.33–7.64

* Confidence interval not calculated because the observed carcass count is less than 5.

Indiana Bat and Northern Long-Eared Bat Take Estimates

Species Composition Approach

Take estimates for Indiana bat and northern long-eared bat were based on fall fatality estimates (Table 4) and the species composition percentages approved by USFWS. Bat fatality rates included fractions of bats; however, a fraction of a bat cannot be taken in a given year. Therefore, the rates calculated in Tables 4 and 5 were rounded to whole integers to calculate take estimates. No Indiana bats or northern long-eared bats were estimated to be taken in 2022, based on the updated species composition percentages (Table 4). The 3-year average of Species Composition take estimates determined that less than one Indiana bat and one northern long-eared bat were taken per year (Table 5). The 3-year average take rates for each species are less than two

(Table 7); therefore the Species Composition Approach did not trigger adaptive management as per the HCP.

Table 4. Indiana bat and northern long-eared bat fatality estimates using the Species Composition Approach for studies conducted at the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 to October 15, 2022.

Bat Species	Bats per Megawatt (Fall)	Estimated Total Bats	Species Composition	Bats per Year	Take Estimate
Indiana bat	2.91	285.58	0.0003	0.09	0
Northern long-eared bat	2.91	285.58	0.0006	0.17	0

Table 5. Three-year average of Indiana bat and northern long-eared bat fatality estimates using the Species Composition Approach for studies conducted at the Hoopeston Wind Project, Vermilion County, Illinois, from 2020 – 2022.

Year	Estimator	Indiana Bats Per Year	Northern Long-Eared Bats Per Year
2020 ¹	GenEst	0.29	0.59
2021 ¹	GenEst	0.26	0.52
2022 ¹	GenEst	0.09	0.17
Overall Average		0.21	0.43

¹ Species composition estimates from 2020 – 2022 were 0.03% for Indiana bat and 0.06% for northern long-eared bat, which were approved by the US Fish and Wildlife Service in October 2020. The estimates were updated with more recent data from post-construction monitoring studies at Hoopeston and other Midwest facilities after the spread of white-nose syndrome.

Probability of Detection

The overall probability of detecting a single bat carcass (g), such as an Indiana bat or northern long-eared bat, during fall 2022 was 0.04 (95% CI: 0.033–0.051; Table 6). The rolling average g was 0.17 (95% CI: 0.16–0.18). The cumulative g over the past five years of monitoring was 0.18 (95% CI 0.15–0.21; Table 6). Variables used to estimate g are presented in Appendix D.

Table 6. Annual, rolling average, and cumulative probabilities of detection (g), B_a , B_b , and ρ for the Hoopeston Wind Project, Vermilion County, Illinois, from 2018 – 2022.

Year	B_a ¹	B_b ¹	ρ ²	g	95% Confidence Interval
2018	181.13	1208.60	1	0.13	0.113–0.149
2019	10.06	29.23	1	0.26	0.134–0.401
2020	645.15	924.52	1	0.41	0.387–0.435
2021	1374.31	26468.23	1	0.05	0.047–0.052
2022	77.27	1797.66	1	0.04	0.033–0.051
Rolling Average (Last 3 Years)	1184.41	5899.62	NA	0.17	0.159-0.176
Cumulative	129.87	601.41	NA	0.18	0.151-0.206

¹ B_a and B_b are the parameters for the beta distribution used to characterize the probability of detection. The g value is the mean of that distribution.

² ρ is the weight in the weighted average that was used to combine the probability of detection distributions across years.

Cumulative Mortality to Date

The EoA cumulative mortality estimates with 50% credibility (which is equivalent to the median value) were that no more than one Indiana bat and one northern long-eared bat fatalities occurred during the 2018 – 2022 study period (Table 7).

Table 7. Cumulative median take estimates to date using Evidence of Absence and Project-specific area correction for studies conducted at the Hoopston Wind Project, Vermilion County, Illinois, from 2018 – 2022.

Estimate Type	Carcass Count	Bat Fatality Estimate	Permitted Take
EoA - Indiana bat (50% credible bound)	0	1	60
EoA - Northern long-eared bat (50% credible bound)	0	1	60

EoA= Evidence of Absence.

Annual Take Rate

Using the Multiple Years Module in the EoA software, the estimated fatality rates (λ) for Indiana bat and northern long-eared bat were calculated based on the g values from the fall seasons of 2020 – 2022 (Table 6). The estimated annual fatality rates for Indiana bat and northern long-eared bat were 0.45 bats per year for either species (Table 8), which is below the expected annual take rate of two Indiana bats and two northern long-eared bats per year reported in the HCP. The short-term trigger assesses the probability that the estimated take rate exceeds the expected take rate, $\Pr(\lambda > \tau)$. At a 90% CI ($\alpha = 0.1$), $\Pr(\lambda > \tau)$ must be greater than or equal to 0.90 for the short-term trigger to fire. The $\Pr(\lambda > \tau)$ was below 0.90, and therefore, the short term-trigger was not met for either species and adaptive management was not triggered (Table 8).

Table 8. Estimated median fatality rate (λ) of Indiana and northern long-eared bats using Evidence of Absence and the Project-specific area correction based on studies conducted at the Hoopston Wind Project, Vermilion County, Illinois, from 2020 – 2022.

Estimate Type	Carcass Count	Estimated Median Fatality Rate (λ)	Expected Take Rate (τ)	$\Pr(\lambda > \tau)$
EoA - Indiana bat (50 th credible bound)	0	0.45	2	0.16
EoA - Northern long-eared bat (50 th credible bound)	0	0.45	2	0.16

EoA= Evidence of Absence.

Projected Mortality for Remainder of the Project Incidental Take Permit

No Indiana bat or northern long-eared bat carcasses occurred during any year of monitoring at the Project. EoA provides potential estimates of Indiana bat and northern long-eared bat mortality based on the level of monitoring and probabilities of detecting a carcass if one occurred. The cumulative median 30-year mortality projection at a 50% credible interval for both Indiana bat and northern long-eared bat was nine Indiana bat and nine northern long-eared bat fatalities (Table 9), which is below the permitted take of 60 individuals of each species described within the Project’s HCP. Therefore, the projected mortality did not trigger adaptive management.

Table 9. Cumulative median 30-year projected bat fatalities using Evidence of Absence for studies conducted at the Hoopeston Wind Project, Vermilion County, Illinois.

Estimate Type	Carcass Count	Permitted Take	Cumulative Median Projected Mortalities (30 years; <i>M</i>)
EoA - Indiana bat ($\alpha = 0.5$)	0	60	9
EoA - Northern long-eared bat ($\alpha = 0.5$)	0	60	9

EoA= Evidence of Absence.

Summary of Incidental Take Permit Compliance

The estimated median Indiana bat and northern long-eared bat annual take based on monitoring studies from 2020 – 2022 were below levels authorized within the ITP, using EoA estimates or the Species Composition Approach and projected mortality over the 30-year life of the Project (Table 5, Table 9). The projected level of take for the remainder of the Project operation is lower than limits authorized by the HCP and ITP; therefore, no adaptive management is required in 2023 (Table 10).

Table 10. Summary of Incidental Take Permit compliance based on projected and estimated Indiana bat and northern long-eared bat fatalities using Species Composition Approach and Evidence of Absence at the Hoopeston Wind Project, Vermilion County, Illinois.

Compliance Metric	Adaptive Management Trigger	Indiana Bat Take Estimate¹	Northern Long-Eared Bat Take Estimate¹	Adaptive Management Required?
3-year average of Species Composition fatality rate	between 2-4 (or > 4)	0.21	0.43	No
OR				
Estimated median 3-year fatality rate (λ)	$\Pr(\lambda > 2) > 0.9$	0.45	0.45	No
AND				
Projected mortality for the remainder of the Project	> 60 individuals	9	9	No
Overall				No

¹ Summary from Tables 5, 8, and 9.

DISCUSSION

The study objectives were to estimate Indiana bat and northern long-eared bat take using the Species Composition Approach and EoA framework as outlined in the HCP, and determine if adaptive management was triggered. No federally or state-listed bats or birds were found during five years of monitoring at the Project. The estimated level of Indiana bat and northern long-eared bat take was below the levels permitted within the Project ITP and described within the HCP.

The purpose of adaptive management is to ensure the Project will not exceed the level of take allowed by the ITP. No Indiana bat or northern long-eared bat carcasses were found during five years of ITP-monitoring at the Project. The average fatality rate for Indiana bat and northern long-eared bat is estimated as less than two bats each using both the Species Composition Approach and EoA, and the projection of future mortalities indicates that cumulative take is not expected to be exceeded; therefore no adaptive management was triggered.

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**Appendix A. Complete List of Carcasses Found at the Hoopston Wind Project
during 2022**

Appendix A. Carcasses found at the Hoopston Wind Project, Vermillion County, Illinois, from April 1 to October 15, 2022.

Date Found	Species	Distance from Turbine (m)	Turbine ID	Search Area Type	Physical Condition
Bats					
05/12/2022	silver-haired bat	46	28	road and pad	intact
06/16/2022	hoary bat	67	10	road and pad	intact
06/30/2022	eastern red bat	20	11	road and pad	intact
07/15/2022	eastern red bat	47	48	road and pad	intact
07/19/2022	eastern red bat	5	23	road and pad	injured
07/27/2022	eastern red bat	30	10	road and pad	intact
07/27/2022	eastern red bat	12	20	road and pad	intact
07/28/2022	eastern red bat	5	1	road and pad	intact
07/28/2022	hoary bat	15	34	road and pad	intact
08/12/2022	eastern red bat	56	50	road and pad	scavenged
08/18/2022	hoary bat	34	46	road and pad	scavenged
08/24/2022	big brown bat	7	11	road and pad	scavenged
09/01/2022	eastern red bat	4	18	road and pad	intact
09/01/2022	silver-haired bat	41	2	road and pad	scavenged
09/01/2022	silver-haired bat	22	23	road and pad	injured
09/01/2022	silver-haired bat	3	7	road and pad	injured
09/02/2022	silver-haired bat	3	36	road and pad	scavenged
09/08/2022	eastern red bat	15	2	road and pad	scavenged
09/14/2022	eastern red bat	7	31	road and pad	scavenged
09/15/2022	eastern red bat	3	43	road and pad	intact
09/29/2022	silver-haired bat	37	42	road and pad	scavenged
Birds					
04/04/2022	house sparrow ¹	7	16	road and pad	intact
07/28/2022	American robin	4	34	road and pad	feather spot
09/08/2022	mourning dove	2	51	road and pad	scavenged
09/21/2022	unidentified warbler	30	10	road and pad	scavenged

¹ Carcass was found outside the search area

ID = identification; m =meters.

**Appendix B. Searcher Efficiency and Carcass Persistence Modeling Estimates
and Results for the Hoopston Wind Project**

Appendix B1. Searcher efficiency models for bats from the Hoopeston Wind Project, Vermilion County, Illinois, from spring, summer, and fall (April 1 to October 15) post-construction monitoring efforts, from 2018 – 2020 (n = 129).

Covariates	k Value	AICc	Delta AICc
Season	k fixed at 0.8	55.90	0
No Covariates	k fixed at 0.8	56.44	0.54*

* Selected model.

AICc = corrected Akaike Information Criteria.

Appendix B2. Carcass persistence models with covariates and distributions for bats at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 to October 15, 2022 (n = 15).

Location Covariates	Scale Covariates	Distribution	AICc	Delta AICc
No Covariates	No Covariates	lognormal	70.55	0
No Covariates	No Covariates	loglogistic	70.74	0.19
No Covariates	-	exponential	70.85	0.30*
No Covariates	No Covariates	Weibull	72.63	2.08

* Selected model.

AICc = corrected Akaike Information Criteria.

Appendix B3. Carcass persistence top models with covariates, distributions, and model parameters for the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 to October 15, 2022.

Size Class	Distribution	Estimated Median Removal Times (days)	Parameter 1	Parameter 2
Bat	exponential ¹	5.87	rate = 0.1181	–

¹ The distribution follows base R parameterization.

**Appendix C. Inputs Used to Calculate Bat Fatality Rates at the Hoopston Wind Project
Using the GenEst Fatality Estimator**

Appendix C. Estimated bat fatality rates and adjustment factors, with 90% confidence intervals (CI) at the Hoopston Wind Project, Vermillion County, Illinois, from April 1 to October 15, 2022.

	Spring		Summer		Fall	
	Estimate	90% CI	Estimate	90% CI	Estimate	90% CI
Search Area Adjustment	0.06	-	0.06	-	0.06	-
Searcher Efficiency	0.95	0.90–0.97	0.95	0.90–0.97	0.95	0.90–0.97
Average Probability of a Carcass Persisting Through the Search Interval	0.67	0.55–0.77	0.67	0.55–0.77	0.67	0.56–0.78
Probability of Available and Detected	0.66	0.51–0.77	0.66	0.51–0.77	0.66	0.51–0.77
Estimated Fatality Rates (Fatalities/Turbine/Season(s))	0.48	NA*	3.80	1.87–6.85	5.83	3.30–9.42
Estimated Fatality Rates (Fatalities/Megawatt/Season(s))	0.24	NA*	1.90	0.93–3.43	2.91	1.65–4.71

* Confidence interval not calculated because the observed carcass count is less than 5.

Appendix D. Inputs and Results for the Single Class Module in Evidence of Absence

Appendix D1. Inputs needed to run Evidence of Absence: Single Class Module for the Hoopston Wind Project, Vermilion County, Illinois, from August 1 to October 15, 2022.

Season	Search Area Type	Search		Spatial Coverage (a)	Temporal Coverage (v)	Searcher Efficiency ³		Carcass Persistence ³			
		Interval (l)	Number of Searches ¹			Carcasses Available	Carcasses Found	Shape (α)	Scale (β)	Scale Lower Limit (β)	Scale Upper Limit (β)
Fall	95-meter roads and pads	7	12	0.064	1	129	122	Null	8.466	4.998	14.354

k = 0.8

¹ Includes one additional search beyond what was conducted in the field to account for the Evidence of Absence graphical user interface assumption that a clearing search is included in the number of searches.

³ An exponential distribution was used for carcass persistence distribution on the roads and pads.

Appendix D2. Results from the Evidence of Absence: Single Class Module for the Hoopston Wind Project, Vermilion County, Illinois, from August 1 to October 15, 2022.

Year	g^1	95% Confidence Interval	Ba^2	Bb^2
2022	0.041	0.033 – 0.051	77.3	1,797.7

¹ g = the probability of detection.

² Ba is the shape 1 parameter for the Beta distribution. Bb is the shape 2 parameter for the Beta distribution.