

Appendix 1. Summary of USFWS Discussions/Coordination re. Eagle Risk at Initial Project Boundary (2012) and ECP for Final Project Layout (2016 – Ongoing)

Coordination	Date	Description
USFWS Assessment of Eagle Risk; USFWS Lansing Field Office Emailed to Project Owner	September 6, 2012	Initial Site Assessment and Site Specific Risk Assessment was provided on the 2012 Project boundary and associated Project layout. The preliminary assessment concluded that given the eagle minutes and survey effort, along with the proposed turbine layout and locations, that the Project was a Category 2 site – high to moderate risk to eagles with opportunities to mitigate impacts, and recommended that an ECP be prepared. The email indicated that the risk assessment could change with additional eagle use information and other changes to the Project.
Meeting with USFWS Region 3 Lansing Field Office	October 19, 2016	Discussion of Project status update. Apple Blossom informed USFWS that the Project boundary had been reduced farther from the 2013/2014 boundary, so that no proposed turbine is within three miles of the Lake shore. Apple Blossom informed USFWS of construction schedule final turbine type and number and the fact that Apple Blossom planned to submit an ECP and apply for an ETP for the Project, even though the risk to eagles appears to be relatively low with the final turbine footprint. The USFWS informed Apple Blossom that they would provide more recent Bald Eagle nest data in the 10-mile buffer of the Project.
Conference call with USFWS Region 3 Lansing Field Office	December 19, 2016	General schedule for ECP development was discussed, along with the proposed ECP outline, which was provided to USFWS ahead of the call. USFWS indicated that if Apple Blossom applied for an ETP under the 2016 Eagle Rule, that a 20-year permit term would be possible. The group also discussed that the new 2016 Eagle Rule will have more formal requirements for surveys, which the Apple Blossom project does not meet (full two years of surveys, etc.) and that some sort of waiver process would be necessary, although the process had not been defined. Apple Blossom informed USFWS that they plan to send a letter of intent regarding their plan to submit an application for an ETP for the Project.

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Conference call with USFWS Region 3 Lansing Field Office	February 8, 2017	<p>The results of WEST's run of the Bayesian risk model were discussed, per the spreadsheet provided to USFWS prior to the call. The group discussed which survey points from the pre-construction surveys were included in the risk model. WEST also clarified that survey data from November 22nd was classified as winter vs. fall, to which USFWS agreed. USFWS indicated that although the details of the formal process for applying and obtaining an ETP under the 2016 Eagle Rule were still being worked out, they do not see a need to delay development of an ECP in the meantime. Apple Blossom stated that they planned to submit under the 2016 Eagle Rule, likely for a 30-year permit term. USFWS indicated that in general they would prefer to receive a relatively complete draft of the ECP, but can review specific issues as needed during development. WEST agreed to provide raw survey data to USFWS, and USFWS agreed to provide 2016 Bald Eagle nest data in shapefile format.</p>
Meeting with USFWS Region 3 Lansing Field Office	July 20, 2017	<p>Apple Blossom provided an update on the Project schedule (in construction, with commercial operations expected sometime 4th Quarter 2017). An overall schedule was discussed for the ETP. Apple Blossom intends to submit an ECP draft to USFWS by late August/early September, and submit the ETP application by end of the year 2017.</p> <p>The USFWS indicated that for projects like Apple Blossom where pre-construction surveys had occurred prior to the 2016 Eagle Rule, that the waiver process should be fairly straightforward if not all of the pre-construction surveys followed all of the ECPG criteria. The group discussed potential approaches to voluntary compensation, as well as post-construction monitoring. The USFWS indicated that it should be possible to incorporate eagle fatality monitoring in the post-construction monitoring that Apple Blossom is planning to start at the project in spring 2018, and have the results "count" towards ETP permit compliance, as long as the methodology and analysis approach were agreed to through coordination between Apple Blossom and the USFWS, and the monitoring was conducted by a third-party contractor. Apple Blossom also indicated that the BBCS would be provided to USFWS, which would include information on the proposed approach to the all bird and bat fatality monitoring surveys.</p>

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Meeting with USFWS Region 3 Lansing Field Office (<i>continued</i>)	July 20, 2017	The group discussed the raw survey data that had been provided to the USFWS, and Apple Blossom and WEST committed to providing additional information on each survey effort from 2011/2012 and 2013/2014, along with information on methods, and whether or not WEST proposed to include the data in the Bayesian model. A conference call in late September was proposed to discuss the model further, where the USFWS would have time to run the model, look at the data, and review a draft ECP which would all be provided ahead of the next call.
Conference Call with USFWS Region 3 Lansing Field Office	September 26, 2017	The group discussed the summary memo and details on the survey memo that was provided to the USFWS in August. USFWS stated there were no questions as far as which surveys were used in WEST's risk model (surveys that occurred where 800-m survey radius overlapped a 1-km buffer of final turbines, with exception of breeding bird surveys, which were excluded because they focused on small birds and did not follow most of the survey recommendations from the ECPG). USFWS had run the Bayesian model and results were similar to those in the ECP; the group discussed a couple of minor discrepancies, including hours of daylight per season, and season dates. The output of the USFWS' LAP tool was discussed, and USFWS was going to see what additional information and/or detail should be provided in a cumulative analysis section in the NEPA analysis. The EA process was discussed, and USFWS indicated that it was acceptable for the same consultant to help develop the applicant-prepared EA as the ECP, but that USFWS would prefer separate teams (NEPA and ECP) within that consulting group. USFWS prefers to receive draft EA document in sections versus as a complete draft document; the schedule for ETP and EA development was discussed as occurring in late 2017 and continuing into 2018. USFWS stated that projects that tier to the 2016 PEIS will not be released as a draft EA for public comment.
Conference Call/Webinar with USFWS Region 3 Lansing Field Office	October 13, 2017	The group discussed in greater detail the input and assumptions for the risk model. It was agreed that the lat/long coordinates USFWS used would be used to determine the daylight hours per season in the risk model (USFWS provided coordinates from inside Project boundary). WEST will update model in ECP accordingly. Further, it was agreed that surveys in late November (after November 15) would be treated as Winter season information in the model (this affects one survey date in November 22). USFWS provided 2017 eagle nest survey data and described what the shapefile attributes contained regarding productivity information.

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Conference Call/Webinar with USFWS Region 3 Lansing Field Office	October 26, 2017	The group discussed the results of WEST rerun of the risk model using the same lat/long coordinates USFWS used. Daylight hours were still a bit different than USFWS' last model run, but USFWS would rerun using the same season dates as in the ECP and comparison would occur again. The group discussed USFWS' questions on the proposed PCMM approach, including clarification on the scan method, and commitment to third-party monitoring.
Conference Call with USFWS Region 3 Lansing Field Office	November 21, 2017, with follow up call on November 28	USFWS provided comments on the revised ECP document provided on November 4. USFWS recommended additional information be provided on the transmission line, as well as more clarification in several areas including inputs into the risk model presented in the ECP, approach to what would occur if a new eagle nest is built in the vicinity of the Project, and updated population information. The group also discussed the next steps in the NEPA process and the waiver process.
Conference Call/Webinar with USFWS Region 3 Lansing Field Office	January 24, 2018	The Owner provided information on the proposed approach to bird and bat fatality monitoring in 2018, and it was discussed whether it would make sense for the Owner to also conduct eagle scans in 2018 if it was not certain how the results may be used, either for updating collision risk model or for compliance. USFWS recommended conducting scans if possible, although it may not be usable towards the post-permit compliance, it should be useful information to have to potentially update the collision risk model for take prediction purposes.
Meeting with USFWS Region 3 Lansing Field Office	September 7, 2018	The Owner, WEST and USFWS looked at how to incorporate the Evidence of Absence estimate from the post-construction fatality study (one eagle found in July) in the Apple Blossom ECP. USFWS indicated that it would be valid to update the ECP with the post-construction fatality information, including updating the collision risk priors, since that is relevant information.
Conference Call/Webinar with USFWS Region 3 Lansing Field Office	February 8, 2019	WEST and the Owner talked through the analysis that went into updating the collision risk model with the post-construction fatality study data; an updated post-eagle take permit monitoring plan was also discussed. USFWS stated they will independently review the data and rerun their risk model, and advised the Owner to update the ECP with the proposed post-permit monitoring plan and the updated take prediction numbers.

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Conference Call/Webinar with USFWS Region 3 Lansing Field Office	April 12, 2019	WEST and the Owner talked through the additional data that was found in the database indicating that eagle use surveys were conducted from May – July 2014; the updated collision risk model incorporating that data was also discussed. USFWS stated they agree that the May – July 2014 data should be used in the model since it is available; they will independently review the data and rerun their risk model. The Owner will update the ECP with the proposed post-permit monitoring plan, the updated take prediction numbers, and to provide more clarification on what measures in Section 8 have already occurred.
Conference Call/Webinar with USFWS Region 3 Lansing Field Office and Migratory Bird Permit Office	May 7, 2020	WEST and the Owner discussed that the data package including the full year of PCM data would be provided to USFWS soon. The group discussed the approach to the CRM, and whether and how the pre-construction use data would be used and the full year of post-construction data. The group d discussed that they would talk about the permitted take number once the NEST team had run their analysis.
Conference Call/Webinar with USFWS Region 3 Lansing Field Office and Migratory Bird Permit Office	July 23, 2020	The USFWS discussed the results of NEST’s CRM, and the USFWS’ decision on permitted take levels for bald eagles. Because the pre-construction use data did not fully comply with the 2013 ECPG recommendations, and because the NEST determined that they would not use the post-construction data to update the model, priors-only model results would be used to determine the permitted take in the Apple Blossom ETP. The group discussed next steps for updating the ECP and EA accordingly.
Conference Call/Webinar with USFWS Region 3 Lansing Field Office and Migratory Bird Permit Office	March 17, 2021	USFWS Migratory Birds Permit staff talked through several recommended updates to the PCMM plan and Adaptive Management approach in the ECP. The Owner and WEST discussed approach to obtaining permitted raptors for bias trials; USFWS indicated that regional carcass persistence data may be available at some point. The Owner will update the ECP with the discussed edits to the PCMM and Adaptive management plan. The USFWS indicated that the EA was also in review and edits would be provided to the NEPA team.