

**Appendix J FEIS Edits Resulting from Reduction in Permit Term  
Length**

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This addendum contains specific modifications and updates to the Fowler Ridge Wind Farm Draft EIS published in March 2013. These revisions were made in response to a reduction in the proposed ITP term length from 22 years to 21 years. As a result of the reduction in ITP term length, the proposed permit term, or life of the project, is now **21 years**. The change in permit term length affects the bird and bat, including Indiana bat, mortality estimates presented in the DEIS. In all cases, the impact is less than that presented in the DEIS, resulting in less take of birds and bats, including Indiana bats. The change in permit term length affects only bird and bat resources and does not affect other resources evaluated in the EIS.

Substantive revisions resulting from the change in permit term length are shown below by FEIS section and page. Where text has been modified or added, the new text appears in red print. Deleted text appears with a ~~strikeout~~ line through the text.

**Section 5.5.3.3 Operation Effects on Bats Not listed Under the ESA, Mortality, No Action Alternative, 2<sup>nd</sup> Paragraph (Page 111)**

The 3<sup>rd</sup> sentence should read:

Over the ~~22~~**21**-year life of the Project, it is estimated that approximately ~~28,173~~ **26,909** bats not listed under the ESA ([1,264 bats x ~~2~~ **1** years] + [1,598 bats x 15 years] + [335 bats x 5 years]) would be killed under the No Action Alternative (Table 5.3).

**Section 5.5.3.3 Operation Effects on Bats Not listed Under the ESA, Table 5.3 (Page 112)**

**Table 5.1 Predicted Fatalities of Bats Not Listed Under the ESA over the ~~22~~ **21**-Year Life of Fowler Ridge Wind Farm by EIS Alternative**

Alternative	Bat Fatalities <sup>1</sup>
No Operational Adjustment Scenario <sup>2</sup>	<del>266,572</del> <b>254,616</b>
No Action Alternative <sup>3</sup>	<del>28,173</del> <b>26,909</b>
3.5m/s Cut-In Speed (Feathered) Alternative	<del>180,776</del> <b>172,668</b>
5.0m/s Cut-In Speed Alternative (Applicant Proposed Action)	<del>147,458</del> <b>139,093</b>
6.5m/s Cut-In Speed Alternative	<del>80,649</del> <b>77,032</b>

<sup>1</sup>Fatalities = (total bats killed per year Phases I - III (355 turbines) x ~~2~~ **1** years) + (total bats killed per year Phases I - IV (449 turbines) x 15 years) + (total bats killed per year Phase IV x 5 years)

<sup>2</sup>No curtailment, no feathering below 3.5 m/s wind speed. Not an alternative under consideration. Included only for comparison purposes

<sup>3</sup>No nightly operation during the fall migration period (August 1-October 15).

**Section 5.5.3.3 Operation Effects on Bats Not listed Under the ESA, Mortality, 3.5 m/s Cut-In Speed (Feathered) Alternative, 2<sup>nd</sup> Paragraph (Page 113)**

The 2<sup>nd</sup> sentence should read:

Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~180,776~~ 172,668 bats not listed under the ESA ([8,108 bats x ~~2~~ 1 years] + [10,255 bats x 15 years] + [2,147 bats x 5 years]) would be killed under the 3.5 m/s Cut-In Speed (Feathered) Alternative (Table 5.3).

**Section 5.5.3.3 Operation Effects on Bats Not listed Under the ESA, Mortality, 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action) Alternative, 2<sup>nd</sup> Paragraph (Page 114)**

The 2<sup>nd</sup> sentence should read:

Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~147,458~~ 139,093 bats not listed under the ESA ([6,614 bats x ~~2~~ 1 years] + [8,365 bats x 15 years] + [1,751 bats x 5 years]) would be killed under the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action) (Table 5.3).

**Section 5.5.3.3 Operation Effects on Bats Not listed Under the ESA, Mortality, 6.5 m/s Cut-In Speed Alternative, 2<sup>nd</sup> Paragraph (Page 114)**

The 2<sup>nd</sup> sentence should read:

Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~80,649~~ 77,030 bats not listed under the ESA ([3,617 bats x ~~2~~ 1 years] + [4,575 bats x 15 years] + [958 bats x 5 years]) would be killed under the 6.5 m/s Cut-In Speed Alternative (Table 5.3).

**Section 5.5.3.3 Operation Effects on Bats Not listed Under the ESA, Population Level Effects of Operation on Bats Not Listed Under ESA (Page 115)**

The 3<sup>rd</sup> sentence should read:

The impact of between ~~28,173~~ 26,909 ( No Action Alternative) and ~~180,776~~ 172,668 (3.5 Cut-In Alternative) primarily tree bat fatalities over the course of ~~22~~ 21 years at FRWF (Table 5.3) is unknown, in part because accurate estimates of most bat populations do not exist.

### Section 5.5.3.4 Operation Effects on Birds, Turbine Related Mortality, 3<sup>rd</sup> Paragraph (Page 117)

The 3<sup>rd</sup> sentence should read:

Over the ~~22~~ 21-year life of the Project, it is estimated that approximately 41,634 ~~39,767~~ birds ([1,867 birds x ~~2~~ 1 years] + [2,362 birds x 15 years] + [494 birds x 5 years]) would be killed.

### Section 5.5.7.2 Birds (Page 124)

The 3<sup>rd</sup> bullet should read:

- Over the ~~22~~ 21-year life of the Project, it is estimated that approximately 41,634 ~~39,767~~ birds ([1,867 birds x ~~2~~ 1 years] + [2,362 birds x 15 years] + [494 birds x 5 years]) would be killed.

### Section 5.5.7.3 Bats Not Listed Under ESA (Page 125)

Bullets 6 – 9 should read:

- Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~28,173~~ 26,909 bats not listed under the ESA ([1,264 bats x ~~2~~ 1 years] + [1,598 bats x 15 years] + [335 bats x 5 years]) would be killed under the **No Action Alternative** (Table 5.3).
- Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~480,776~~ 172,668 bats not listed under the ESA ([8,108 bats x ~~2~~ 1 years] + [10,255 bats x 15 years] + [2,147 bats x 5 years]) would be killed under the **3.5 m/s Cut-In Speed (Feathered) Alternative** (Table 5.3).
- Over the ~~22~~ 21-year life of the Project, it is estimated that approximately 447,458 ~~139,093~~ bats not listed under the ESA ([6,614 bats x ~~2~~ 1 years] + [8,365 bats x 15 years] + [1,751 bats x 5 years]) would be killed under the **5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action)** (Table 5.3).
- Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~80,649~~ 77,030 bats not listed under the ESA ([3,617 bats x ~~2~~ 1 years] + [4,575 bats x 15 years] + [958 bats x 5 years]) would be killed under the **6.5 m/s Cut-In Speed Alternative** (Table 5.3).

**Section 5.6.3.2 Operations Effects, Table 5.5 (Page 130)**

**Table 5.2 Predicted Indiana Bat Fatalities over the 22 21-Year Life of Fowler Ridge Wind Farm by EIS Alternative**

Alternative	Indiana Bat Take <sup>3</sup>
No Operational Adjustment Scenario <sup>1</sup>	<del>384</del> 364
No Action Alternative <sup>2</sup>	0
3.5m/s Cut-In Speed (Feathered) Alternative	<del>245</del> 234
5.0m/s Cut-In Speed Alternative (Applicant Proposed Action)	<del>193</del> 184
6.5m/s Cut-In Speed Alternative	<del>86</del> 82

<sup>1</sup>No curtailment, no feathering below 3.5 m/s wind speed. Not an alternative under consideration. Included only for comparison purposes.

<sup>2</sup>No nightly operation during the fall migration period (August 1-October 15).

<sup>3</sup>Take = (total bats killed per year Phases I - III (355 turbines) x ~~2~~ 1 years) + (total bats killed per year Phases I - IV (449 turbines) x 15 years) + (total bats killed per year Phase IV x 5 years)

**Section 5.6.3.2 Operations Effects, 3.5 m/s Cut-In Speed (Feathered) Alternative (Page 130)**

Paragraphs 2 – 3 should read:

Based on post-construction mortality data collected at FRWF, total Indiana bat take under the 3.5 m/s alternative is predicted to be approximately 10.9 Indiana bats per year when Phases I - III are operating (355 turbines), 13.9 Indiana bats per year when Phases I - IV are operating (449 turbines), and 2.9 Indiana bats per year when only Phase IV is operating (94 turbines) (Table 5.4). Over the ~~22~~ 21-year life of the Project, it is estimated that approximately ~~245~~ 234 Indiana bats would be killed under the 3.5 m/s Cut-In Speed (Feathered) Alternative (Table 5.5).

It is predicted that 75% of the Indiana bats killed at FRWF would be adult females (see Section 4.2 of the HCP); the reproductive capacity of ~~484~~ 176 females taken by the Project is estimated as potentially contributing an additional ~~202~~ 194 bats to the population by Year ~~22~~ 21 of the Project. Thus, the total impact of the taking under this alternative would be ~~447~~ 428 Indiana bats over the life of the Project, or ~~20.34~~ bats per year on average. The loss of ~~20.34~~ Indiana bats per year would represent a loss of 0.007% of the estimated 2011 population of the MRU (305,297 Indiana bats) (USFWS 2012d). The loss to the rangewide population would be 0.005%, based on the 2011 estimated population size of 424,708 Indiana bats (USFWS 2012d). Losses of this magnitude across the range of the Indiana bat or within the MRU would not in itself pose a threat to any population or the species as a whole. How these impacts are distributed among maternity colonies and hibernacula are, however, important to consider.

### **Section 5.6.3.2 Operations Effects, 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action) (Page 132)**

Paragraphs 2 – 3 should read:

Total Indiana bat take under the 5.0 m/s alternative is predicted to be approximately 8.6 Indiana bats per year when Phases I-III are operating (355 turbines), 10.9 Indiana bats per year when Phases I-IV are operating (449 turbines), and 2.3 Indiana bats per year when only Phase IV is operating (94 turbines) Table 5.4). Over the ~~22~~ **21**-year life of the Project, it is estimated that approximately ~~493~~ **184** Indiana bats would be killed under the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action) (Table 5.5). Actual Indiana bat mortality is likely to be lower than these estimates, because they were based on the minimum reductions in mortality that were observed in studies using similar operational adjustments.

It is predicted that 75% of the Indiana bats killed at FRWF would be adult females (see Section 4.2 of the HCP); the reproductive capacity of ~~445~~ **138** females taken by the Project is estimated as potentially contributing an additional ~~460~~ **152** bats to the population by Year ~~22~~ **21** of the Project. Thus, the total impact of the taking under this alternative would be ~~353~~ **336** Indiana bats over the life of the Project, or 16.0 bats per year on average.

### **Section 5.6.3.2 Operations Effects, 6.5 m/s Cut-In Speed Alternative (Page 133)**

Paragraphs 2 – 3 should read:

Based on post-construction mortality data collected at FRWF, total Indiana bat take under the 6.5 m/s alternative is predicted to be approximately 3.9 Indiana bats per year when Phases I - III are operating (355 turbines), 4.9 Indiana bats per year when Phases I - IV are operating (449 turbines), and 1.0 Indiana bats per year when only Phase IV is operating (94 turbines) (Table 5.4). Over the ~~22~~ **21**-year life of the Project, it is estimated that approximately ~~86~~ **82** Indiana bats would be killed under the 6.5 m/s Cut-In Speed Alternative (Table 5.5).

It is predicted that 75% of the Indiana bats killed at FRWF would be adult females (see Section 4.2 of the HCP); the reproductive capacity of ~~65~~ **62** females taken by the Project is estimated as potentially contributing an additional ~~72~~ **68** bats to the population by Year ~~22~~ **21** of the Project. Thus, the total impact of the taking under this alternative would be ~~458~~ **150** Indiana bats over the life of the Project, or ~~7.2~~ **7.1** bats per year on average.

### **Section 5.6.3.5 Mitigation for Take of Indiana Bats (Page 134)**

The 1<sup>st</sup> paragraph should read:

Mitigation would not occur under the No Action Alternative. Mitigation for Indiana bats is described below for the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action). Mitigation under the 3.5 m/s Cut-In Speed (Feathered) Alternative and the 6.5 m/s Cut-In Speed Alternative would be qualitatively similar to that described for the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action). Mitigation proposed by the HCP is designed to compensate for the ~~353~~ **336** total Indiana bats expected to be lost from the population (from

direct take and consequent reproductive loss) as a result of Project operation. It is expected that the summer habitat mitigation, described below, would be sufficient to mitigate the take of ~~434~~ **114** Indiana bats (~~37~~ **34**% of the total affected bats) and that the winter habitat mitigation would be sufficient to mitigate the take of the remaining 222 Indiana bats (~~63~~ **66**% of the total affected bats).

### **Section 5.6.3.5 Mitigation for Take of Indiana Bats, Summer Habitat Mitigation (Page 135)**

The 2<sup>nd</sup> paragraph should read:

Mitigation Bank Option. FRWF has the option to utilize any mitigation bank that has been set up and approved by the USFWS for mitigation of Indiana bats in the MRU that includes lands within Indiana provided such a bank is operational at the time FRWF must meet its mitigation obligations. FRWF may have the option to contribute to the mitigation bank at a level sufficient to offset the impacts of taking ~~434~~ **114**<sup>59</sup> Indiana bats.

### **Section 5.6.3.5 Mitigation for Take of Indiana Bats (Page 135)**

Footnote 59 should read:

<sup>59</sup> Under the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action), a total of ~~353~~ **336** Indiana bats would need to be mitigated for (i.e., impact of taking). The ~~434~~ **114** bats equates to ~~37~~ **34**% of that impact, which is the amount accounted for by summer mitigation. The other 222 bats (~~63~~ **66**%) would be mitigated for by the Wyandotte Cave gating.

### **Section 5.6.4 Summary of Effects to Rare, Threatened and Endangered Species (Page 137)**

Bullets 6 – 8 should read:

- Over the ~~22~~ **21**-year life of the Project, it is estimated that approximately ~~245~~ **234** Indiana bats would be killed under the **3.5 m/s Cut-In Speed (Feathered) Alternative** (Table 5.5). The total impact of the taking (females + pups) would be ~~447~~ **428** Indiana bats over the life of the Project, or ~~20.34~~ **20.34** bats per year on average.
- Over the ~~22~~ **21**-year life of the Project, it is estimated that approximately ~~193~~ **184** Indiana bats would be killed under the **5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action)** (Table 5.5). The total impact of the taking (females + pups) would be ~~353~~ **336** Indiana bats over the life of the Project, or 16.0 bats per year on average.
- Over the ~~22~~ **21**-year life of the Project, it is estimated that approximately ~~86~~ **82** Indiana bats would be killed under the **6.5 m/s Cut-In Speed Alternative** (Table 5.5). The total impact of the taking (females + pups) would be ~~458~~ **150** Indiana bats over the life of the Project, or ~~7.21~~ **7.21** bats per year on average.

### Section 5.15.3.2 Wind Energy Development, PIF Region 31 (Page 172)

The 3<sup>rd</sup> paragraph should read:

Applying the current regional average bird mortality rate to the expected level of build-out in ~~22~~ **21** years results in an estimated 213,288 total birds killed annually at other wind energy facilities across PIF Region 31 at the end of the life of the Project. Although the rate at which wind energy development would occur over the next ~~22~~ **21** years is difficult to predict, averaging the expected maximum rate of bird mortality (213,288 birds/year at the ~~22~~ **21**-year maximum build-out capacity) with the current rate of bird mortality (5,858 birds/year at the currently-installed capacity) indicates that an average of 109,573 total birds may be killed in PIF Region 31 each year for the next ~~22~~ **21** years, for an overall total of ~~2,440,606~~ **2,301,033** birds killed in PIF Region 31 during the life of FRWF. In addition to this mortality, FRWF will contribute over its lifespan a total of approximately ~~41,634~~ **39,767** birds, entailing an increase of 1.73% to the overall mortality of birds at wind energy facilities over the next ~~22~~ **21** years in PIF Region 31. Compared to other anthropogenic sources of avian mortality (see Section 5.15.3.3 below), the effect of avian mortality at wind energy facilities in PIF Region 31 is expected to be minor and unlikely to cause population level effects.

### Section 5.15.4.1 Wind Energy Development, Bats Not Listed Under the ESA (Pages 176 – 177)

Paragraphs 2 – 4 should read:

Applying the current regional average bat mortality rate to the expected level of build-out in ~~22~~ **21** years results in an estimated 4,902,000 total bats killed annually at other wind energy facilities across the region at the end of the life of the Project. Although the rate at which wind energy development will occur over the next ~~22~~ **21** years is difficult to predict, averaging the expected maximum rate of bat mortality (4,902,000 bats/year at the ~~22~~ **21**-year maximum build-out capacity) with the current rate of bat mortality (131,736 bats/year at the currently-installed capacity) indicates that an average of 2,516,870 total bats may be killed in the region each year for the next ~~22~~ **21** years, for an overall total of ~~55,371,440~~ **52,854,270** bats killed in Region 3 during the life of FRWF. In addition to this mortality, FRWF would contribute over its lifespan a total of ~~480,776~~ **172,668** bats under the 3.5 m/s Cut-In Speed (Feathered) Alternative, ~~447,458~~ **139,093** total bats under the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action), ~~80,649~~ **77,032** bats under the 6.5 m/s Cut-In Speed Alternative, and ~~28,173~~ **26,909** bats under the No Action Alternative. FRWF's mortality contribution would entail an increase of 0.33%, ~~0.27~~ **0.26**%, 0.15%, or 0.05%, under the Project Alternatives, respectively, to the overall mortality of bats not listed under the ESA over the next ~~22~~ **21** years in Region 3. Therefore, mortality of bat species not listed under the ESA at FRWF is not expected to be a significant addition to the overall level of bat mortality at wind energy facilities in Region 3, particularly under the adjustment alternatives.

The actual level of bat mortality across the region may be lower, as many wind energy facilities in Region 3 now implement at least some degree of modified turbine operations during the fall bat migration season, although several older facilities in the region remain unregulated under ESA or state laws. Additionally, a growing body of research and improved understanding of the factors affecting bat mortality risk at wind energy facilities is likely to increase the effectiveness

of future turbine operational protocols at reducing bat mortality. If all wind energy facilities in the region implemented modified turbine operations that reduced bat mortality by 50%, the cumulative impacts of wind energy development on bat species not listed under the ESA in Region 3 would be greatly reduced. Predicted bat mortality would decrease to approximately 1,258,435 bats per year on average, or approximately ~~27,685,570~~ **26,427,135** bats killed in Region 3 during the life of the FRWF. FRWF's mortality would contribute an increase of ~~0.66~~ **0.65%**, ~~0.54~~ **0.53%**, ~~0.30~~ **0.29%**, or 0.10%, under the Project alternatives, respectively, to this reduced level of overall mortality of bats not listed under the ESA over the next ~~22~~ **21** years in Region 3. FRWF's mortality contribution would therefore still not entail a significant addition to overall bat mortality in the region.

As discussed above, based on current data, fatalities at industrial wind facilities are heavily skewed toward the three species of migratory tree bats. If the build-out scenarios are implemented and the estimates based on current post-construction monitoring remain more or less the same, millions of tree bats would die at wind facilities in Region 3 alone. Because we do not have good population estimates for most bat species including migratory tree bats, it is unclear how either the cumulative mortality under no curtailment (~~55,371,140~~ **52,854,270** bats), under 50% curtailment (~~27,685,570~~ **26,427,135** bats), or some scenario in-between would impact the various affected bat species. As far as we understand, bat species potentially impacted by wind development in Region 3 have an evolutionary strategy focused on high adult survival and low fecundity. This suggests that a high level of adult loss could be detrimental to the affected populations. The loss of millions of tree bats over the life of the project is unknown but may be unsustainable. Kunz, et al. (2007b) essentially characterized the current state of our understanding in their 2007 article on the ecological impacts of wind development: "Our current knowledge and the projected future development of wind energy facilities in the U.S. suggest the potential for a substantial population impact to bats." Research is ongoing to estimate population levels and the potential impacts of wind facilities focused on migratory tree bats.

#### **Section 5.15.4.1 Wind Energy Development, Indiana Bat (Page 178)**

The 3<sup>rd</sup> paragraph should read:

Applying the recovery unit's current estimated baseline Indiana bat mortality rate to the expected level of build-out in ~~22~~ **21** years (64,920.40 MW) results in an estimated 3,246 total Indiana bats killed annually at wind energy facilities across the recovery unit at the end of the life of the Project. Although the rate at which wind energy development would occur over the next ~~22~~ **21** years is difficult to predict, averaging the expected maximum rate of Indiana bat mortality (3,246 Indiana bats/year at the ~~22~~ **21**-year maximum build-out capacity) with the current rate of Indiana bat mortality (41 Indiana bats/year at the currently-installed capacity) indicates that an average of 1,644 Indiana bats may be killed in the recovery unit each year for the next ~~22~~ **21** years, representing 0.54% of the MRU's 2011 population. At this rate, a total of ~~36,168~~ **34,524** Indiana bats would be killed in the MRU during the life of FRWF, assuming no operational adjustments are implemented. In addition to this mortality, FRWF would contribute over its lifespan a total of ~~245~~ **234** Indiana bat fatalities under the 3.5 m/s Cut-In Speed (Feathered) Alternative, ~~493~~ **184** Indiana bat fatalities under the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action), ~~86~~ **82** Indiana bat fatalities under the 6.5 m/s Cut-In Speed Alternative, and zero (0) Indiana bat fatalities under the No Action Alternative. FRWF's mortality contribution would entail an increase of 0.68%, 0.53%, 0.24%, or 0.00%, under the

Project alternatives, respectively, to the overall mortality of Indiana bats over the next ~~22~~ **21** years in the MRU. However, mitigation measures designed to fully compensate for the level of expected take and the associated loss in reproduction would be implemented as a part of the HCP under the 3.5 m/s Cut-In Speed (Feathered) Alternative, the 5.0 m/s Cut-In Speed Alternative (Applicant Proposed Action), and the 6.5 m/s Cut-In Speed Alternative. Therefore, mortality of Indiana bats at FRWF is not expected to be a significant addition to the overall level of Indiana bat mortality at wind energy facilities in the MRU. The loss of 1,644 Indiana bats each year during the ~~22~~ **21** year life of the Project would be distributed across many maternity colonies and hibernacula. In the absence of other major threats, we would not expect this level of impact to negatively affect either the MRU population or specific maternity or hibernating populations. We do not yet fully understand the impacts of WNS on the MRU; however, this may alter the dynamics of the MRU population (see Section 5.15.4.2 for a discussion of WNS).

#### **Section 5.15.4.5 Summary of Cumulative Effects to Bats, Indiana Bats (Page 183)**

The 2<sup>nd</sup> paragraph should read:

To understand the implications of cumulative bat mortality requires knowledge of baseline populations. Unfortunately, there is little information on current population estimates for most bat species in North America at local, regional, or continental scales (O'Shea et al. 2004, Kunz et al. 2007a). We have a better understanding of past and current population levels for Indiana bats than for any other species, which is largely an artifact of their long-standing endangered status and the ability to monitor populations through hibernacula counts. The total impact of the taking (~~353~~ **336** Indiana bats) over the ~~22~~ **21**-year life of the FRWF sought by the Applicant is roughly 0.1% of the 2011 MRU Indiana bat population. Additionally, the Applicant's strategy for addressing changed circumstances, including population declines associated with WNS, provide further mechanisms for reducing the Project's contribution to cumulative effects to Indiana bats.

#### **Section 5.16.1 No Action Alternative (Page 184)**

Paragraphs 1 – 2 should read:

Construction of Phase IV under the No Action Alternative would result in an irreversible or irretrievable alteration of 78.2 acres of prime and unique farmland. However, turbines would be removed during decommissioning (after a ~~22~~ **21**-year operation life), and the land would be restored to agricultural use.

Operation of the Project under the No Action Alternative would result in the incidental take of 0 Indiana bats over the life of the Project (see Section 5.6.7). Up to ~~41,634~~ **39,767** birds and ~~28,173~~ **26,909** bats not listed under the ESA may be incidentally taken during the life of the Project (see Section 5.5.7).

### **Section 5.16.2 3.5 m/s Cut-in Speed (Feathered) (Page 184)**

The 2<sup>nd</sup> paragraph should read:

Operation of the Project under the 3.5 m/s Cut-in Speed (Feathered) Alternative would result in the incidental take of approximately ~~245~~ 234 Indiana bats over the life of the Project (see Section 5.6.7). Additionally, up to ~~41,634~~ 39,767 birds and ~~180,776~~ 172,668 bats not listed under the ESA may be incidentally taken during the life of the Project (see Section 5.5.7).

### **Section 5.16.3 5.0 m/s Cut-in Speed (Applicant Proposed Action) (Page 184)**

The 2<sup>nd</sup> paragraph should read:

Operation of the Project under the 5.0 m/s Cut-In Speed Alternative would result in the incidental take of approximately ~~493~~ 184 Indiana bats over the life of the Project (see Section 5.6.7). Additionally up to ~~41,634~~ 39,767 birds and ~~147,458~~ 139,093 bats not listed under the ESA may be incidentally taken during the life of the Project (see Section 5.5.7).

### **Section 5.16.4 6.5 m/s Cut-in Speed (Page 184)**

The 2<sup>nd</sup> paragraph should read:

Operation of the Project under the 6.5 m/s Cut-in Speed Alternative would result in the incidental take of approximately ~~86~~ 82 Indiana bats over the life of the Project (see Section 5.6.7). Additionally, up to ~~41,634~~ 39,767 birds and ~~80,649~~ 77,032 bats not listed under the ESA may be incidentally taken during the life of the Project (see Section 5.5.7).