

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

**Final Report
April – October 2024**



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Hoopeston Wind, LLC**

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EXECUTIVE SUMMARY

Western EcoSystems Technology, Inc., estimated bat fatalities at the Hoopeston Wind Project (Project) in Vermilion County, Illinois, during the active bat season (spring, summer, and fall) of 2024. Methods used to monitor and estimate the number of fatalities were consistent with the Project's Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP) TE54252C-0 for Indiana and northern long-eared bats. The study objectives were to estimate Indiana and northern long-eared bat take and determine if adaptive management was triggered.

Annual monitoring in 2024 consisted of weekly searches of roads and pads at all turbines from April 1 – October 15, 2024, per the HCP. Indiana 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 GenEst (a generalized estimator of fatality), and used to estimate the Species Composition Approach estimates, as agreed upon with US Fish and Wildlife Service. 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. Substantial annual variability in carcass persistence rates occurred during the first three years of intensive monitoring. Therefore, carcass persistence trials were conducted in 2024 per the HCP, in coordination with the USFWS.

No Indiana 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 1.71 Indiana and 1.71 northern long-eared bat, each, were taken during 2024, using the 50% credible bound of the posterior mortality distribution. Take estimates for 2024, using the Species Composition Approach and based on GenEst, were no Indiana bats and one northern long-eared bat.

Within the 3-year adaptive management evaluation period, the estimated fatality rates of Indiana 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 2024 at the Hoopeston Wind Project (Project) operated by Hoopeston Wind, LLC (Hoopeston), in Vermilion County, Illinois. The monitoring was completed in accordance with the Project's Habitat Conservation Plan (HCP) and Incidental Take Permit (ITP) TE54252C-0 for Indiana (*Myotis sodalis*) and northern long-eared bats (*M. septentrionalis*). This was the seventh year of monitoring under the Project's ITP. The study objectives were to estimate Indiana 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 comprised much of the region, and scattered groves of trees and marshes occurred on level uplands. Today, the main land use within the Project is cultivated crops, consisting primarily of corn (*Zea mays*), soybeans (*Glycine max*), and winter wheat (*Triticum* spp.). In addition, there are scattered residences and small areas of hay/pasture, grasslands, and shelterbelts (National Land Cover Database 2019; Figure 1). Fatality monitoring was completed at all turbines, as shown in Figure 1 and as described in the *Methods* section.

The Project is composed of 49 2.0-megawatt (MW) wind turbines capable of generating up to 98 MW (Figure 1). All turbines are V 100 Vestas turbines with a 100-meter (m; 328-foot [ft]) hub height and 49-m (161-ft) blade length.

METHODS

The study contained two field components: standardized carcass searches and carcass persistence trials. Standardized carcass searches were completed in the spring, summer, and fall in accordance with the monitoring methods described for annual monitoring in the HCP (Hoopeston 2017). Carcass persistence trials were completed in the fall. Searcher efficiency and area adjustment estimates were determined using data collected from 2018–2020, when the Project completed intensive monitoring as outlined in the HCP.

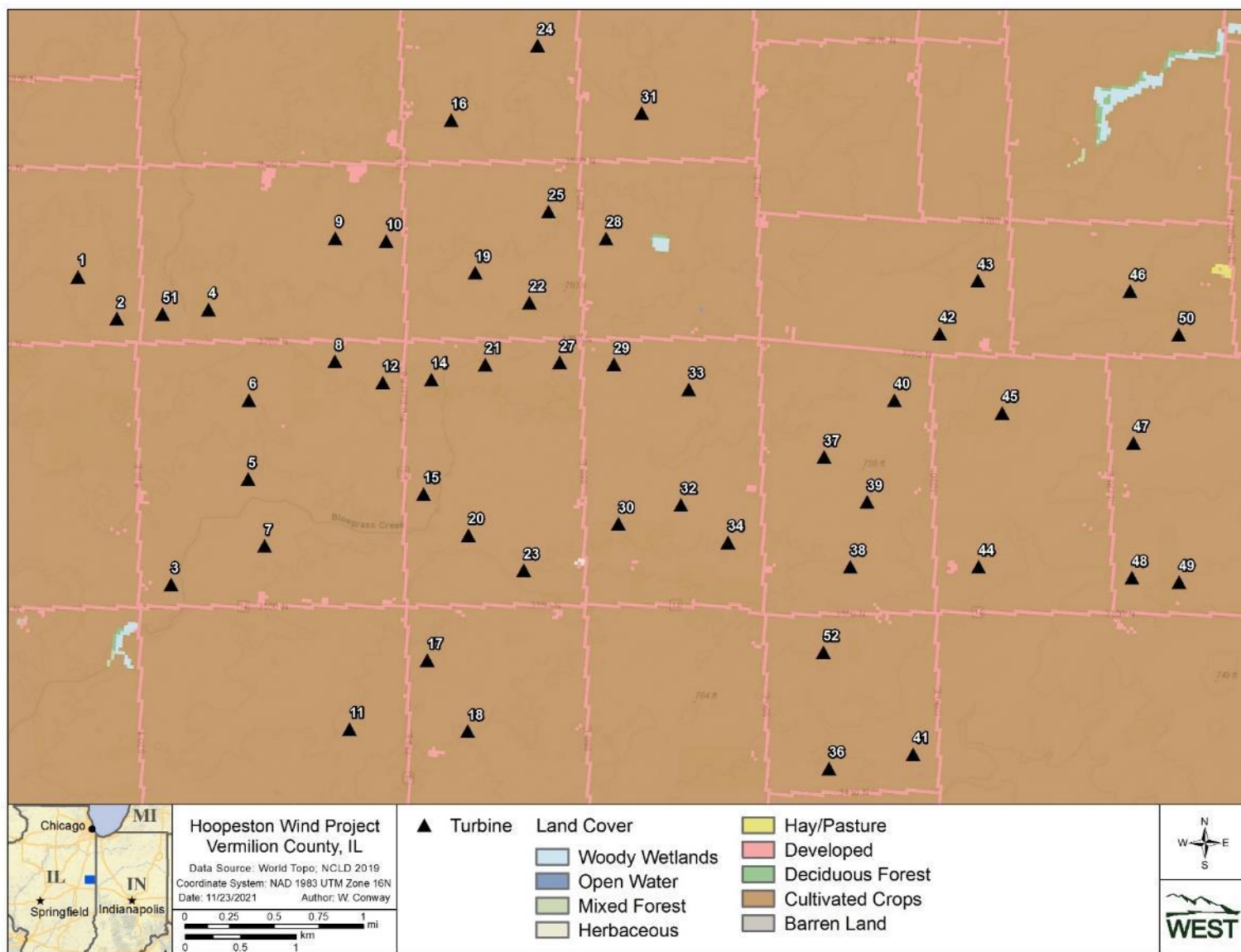


Figure 1. Land cover and turbine layout at the Hoopeston Wind Project, Vermilion County, Illinois.

Field Methods

Standardized Carcass Searches

In all seasons, a technician 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. The technician 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. All carcass searches were conducted by a WEST technician trained to follow the Project's carcass search protocols, including proper handling and reporting of carcasses.

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 all bat carcasses in accordance with WEST's Illinois Department of Natural Resources (IDNR) Scientific Permit (NH24.5223C), WEST's IDNR Endangered and Threatened Species Permits (20000), WEST's US Fish and Wildlife Service (USFWS) Native Endangered and Threatened Species Recovery Permit (ES234121), 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 via photographs by WEST biologists experienced with bird identification.

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.

Each trial carcass was discreetly marked with a black zip-tie and/or a piece of electrical tape around the upper forelimb for identification as a trial carcass. Carcasses were dropped from waist-height or higher and allowed to land in a random posture. The technician monitored the trial carcasses over a 28-day period, checking the carcasses on days 1–4, 7, 10, 14, 21, and 28 after placement. Trial carcasses were monitored until the carcass was completely removed or the trial period ended, whichever occurred first. 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 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 an available 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) were calculated for seasonal and overall estimates using a parametric bootstrap for GenEst (Dalthorp et al. 2018). Bootstrapping is a computer simulation technique that is useful for calculating variances and CIs for complicated test statistics; 1,000 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. Estimates of searcher efficiency were based on data collected from 2018–2020 on roads and pads (Iskali and Pham 2019; Rodriguez et al. 2020, 2021). From 2018–2020, 133 bat carcasses were placed for technicians on roads and pads. 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, or corrected Akaike Information Criterion, 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. Compliance with the ITP 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 and northern long-eared bat fatalities were estimated for the fall using the Species Composition Approach. The Species Composition Approach assumes that Indiana 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 and northern long-eared bats as 0.29% and 0.24%, respectively (Hoopeston 2017). However, Hoopeston 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 and northern long-eared bats was calculated across 2022–2024, using the GenEst estimates reported in 2022, 2023 (Rodriguez et al. 2023, Voorhees and Medina-Garcia 2024), and 2024.

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 carcasses found 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* section).
- 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* section).
- Search area adjustment, based on the estimated carcass-density distribution weighted by the proportion of area searched (see *Area Adjustment* section).
- Detection reduction factor (k), expressed as the fraction to which searcher efficiency was reduced with each successive search (see *Detection Reduction Factor* section). The detection reduction factor 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 2024 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 seven years.

Rolling Average Probability of Detection

The HCP specifies that the fatality rates of Indiana and northern long-eared bats are tested based on a rolling average detection probability, including the most recent three years of monitoring events. At present, that monitoring window includes 2022–2024. Detection probabilities from 2022–2024 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 2022–2024. 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 1-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 the Monte Carlo simulation (see *Projected Mortality for the Remainder of the Project Incidental Take Permit* section).

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 2018–2024 were combined into the cumulative (to date) detection probability, using the per-year g estimates and the relative weights (p) 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 (p), which were all assumed to be one from 2018–2022 because there were no changes in facility operations (such as cut-in speed) that would have resulted in different weights, and 0.96 and 0.98 in 2023 and 2024, respectively, due to a turbine that was non-operational during the fall. 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 (2022–2024). Each of the 10,000 annual take rate samples were applied for the remaining 23 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 was summed over the 23 years, resulting in 10,000 realizations of projected mortality from year 2025 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

From April 1 – October 15, 2024, 1,358 searches of roads and pads were completed at operational turbines. Due to turbine maintenance, site conditions, and weather constraints, 63 searches at operational turbines were missed (4.6%; eight of the missed turbines were at Turbine 1, where maintenance prohibited searches in the majority of the fall) No Indiana or northern long-eared bat

carcasses, or carcasses of other federally or state-listed as threatened or endangered bat or bird species, were identified during the study. Details of all carcasses found during the study are presented in Appendix A.

Overall Fatalities

During scheduled carcass searches, 58 bat carcasses, belonging to six known species or groups were found. Silver-haired bat (*Lasionycteris noctivagans*; n = 28; 48.3%) was the most common species fatality, followed by eastern red bat (*Lasiurus borealis*; n = 19; 32.8%), hoary bat (*Lasiurus cinereus*; n = 6; 10.3%), big brown bat (*Eptesicus fuscus*; n = 3; 5.2%), evening bat (*Nycticeius humeralis*; n = 1; 1.7%) and unidentified non-*Myotis* (n = 1; 1.7%). In addition, seven bird carcasses of seven known species were found during the study (Table 1).

Carcasses for Analysis

During the study period, 56 bat carcasses were found within the search area. Two bat carcasses were found outside of the study area and were excluded from fatality estimates (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 – October 15, 2024.

Species	Included in GenEst Fatality Estimate		Outside Search Area ¹		Total	
	Total	%	Total	%	Total	%
silver-haired bat	27	48.2	1	50	28	48.3
eastern red bat	18	32.1	1	50	19	32.8
hoary bat	6	10.7	0	0	6	10.3
big brown bat	3	5.4	0	0	3	5.2
evening bat	1	1.8	0	0	1	1.7
unidentified non-myotis	1	1.8	0	0	1	1.7
Overall Bats²	56	100	2	100	58	100
brown creeper	0	0	0	0	1	14.3
golden-crowned kinglet	0	0	0	0	1	14.3
mourning dove	0	0	0	0	1	14.3
ruby-crowned kinglet	0	0	0	0	1	14.3
red-eyed vireo	0	0	0	0	1	14.3
ruby-throated hummingbird	0	0	0	0	1	14.3
yellow-billed cuckoo	0	0	0	0	1	14.3
Overall Birds^{2,3}	0	0	0	0	7	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.

GenEst = a generalized estimator of fatality.

Timing and Distribution of Bat Fatalities

The majority of bat carcasses were found between the beginning of August and the end of September (Figure 2; Appendix A). The composition of bat fatalities varied by season, with only silver-haired bats and eastern red bats found in the spring. In the summer big brown bats and hoary bats were found in addition to the species found in the spring. In the fall one additional

species, evening bat, and an unidentified non-*Myotis* were also found in addition to the species found in spring and summer (Table 2).

Table 2. Species composition by season for bat carcasses found at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 – October 15, 2024.

Species	Spring		Summer		Fall	
	# of Carcasses	%	# of Carcasses	%	# of Carcasses	%
big brown bat	0	0	1	20.0	2	4.3
eastern red bat	1	16.7	2	40.0	16	34.0
evening bat	0	0	0	0	1	2.1
hoary bat	0	0	1	20.0	5	10.6
silver-haired bat	5	83.3	1	20.0	22	46.8
unidentified non- <i>Myotis</i>	0	0	0	0	1	2.1
Total¹	6	100	5	100	47	100

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

Bat carcasses were found at 32 of the 49 operational study turbines. Five bat fatalities were recorded at Turbine 49; four bat fatalities were recorded at Turbine 2; three bat carcasses were recorded at Turbine 20; two bats were found at 15 of the turbines and one bat was found at 14 of the turbines. Bat carcasses were recorded at turbines across the Project and there were no apparent spatial patterns to the distribution of carcasses.

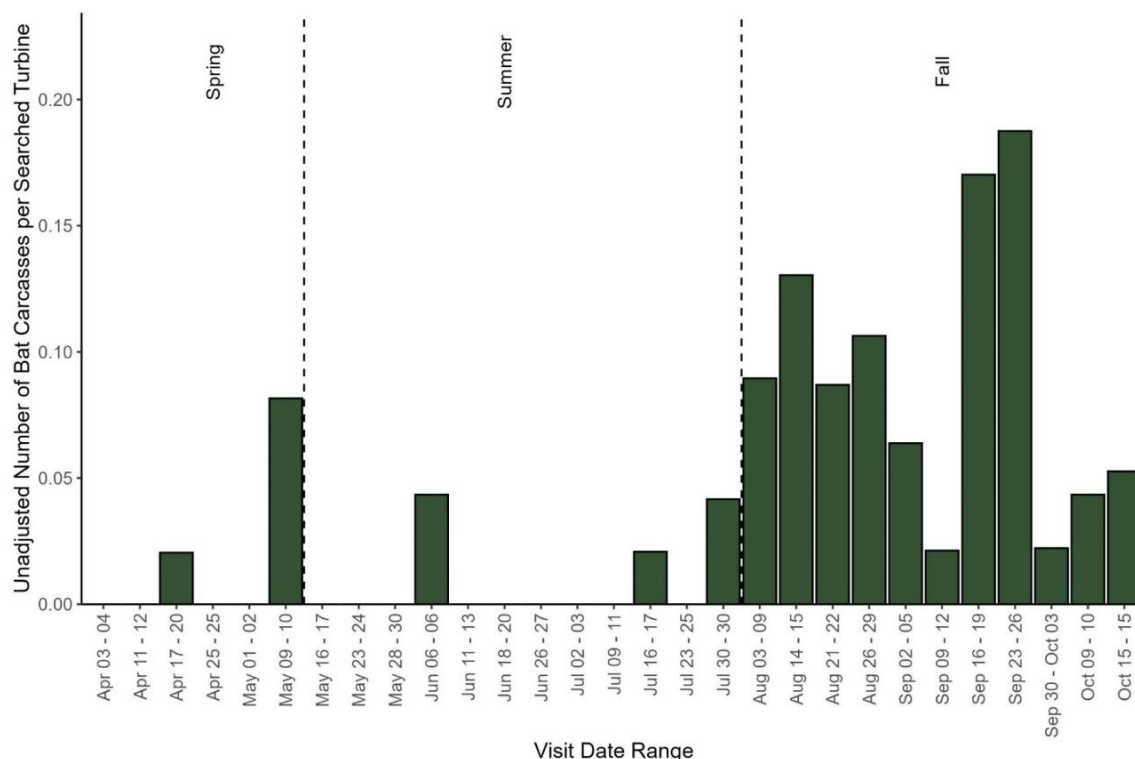


Figure 2. Timing of bat carcasses for carcasses included in the GenEst (a generalized estimator of fatality) estimates at the Hoopeston Wind Project, Vermilion County, Illinois, from April 1 – October 15, 2024.

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; Appendix C).

Carcass Persistence Trials

The best-fit model for carcass persistence, which was used in determining fatality and take estimates, had an exponential distribution (Appendix B2). The estimated median bat carcass persistence time was 17.35 days (Appendix B3). The average probability that a bat carcass persisted through a 7-day search interval was 0.87 (90% CI: 0.80–0.92).

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 10.78 bats per MW (90% CI: 8.44–13.43; 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 – October 15, 2024.

Season	Bat Fatality Estimate per Turbine	90% CI	Bat Fatality Estimate per MW	90% CI
Spring	1.87	0.72–3.38	0.93	0.36–1.69
Summer	1.94	0.77–3.52	0.97	0.38–1.76
Fall	17.54	13.51–22.41	8.77	6.75–11.21
Overall	21.55	16.88–26.86	10.78	8.44–13.43

GenEst = a generalized estimator of fatality; CI = confidence interval.

Indiana Bat and Northern Long-eared Bat Take Estimates

Species Composition Approach

Take estimates for Indiana and northern long-eared bats 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 Table 4 were rounded to whole integers to calculate take estimates. No Indiana bats were estimated to be taken in 2024, based on the updated species composition percentages (Table 4). One northern long-eared bat was estimated to be taken in 2024. The 3-year average of Species Composition take estimates determined that less than one Indiana bat and northern long-eared bat were taken per year (Table 5). The 3-year average take rates for

each species are less than two; 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 – October 15, 2024.

Bat Species	Bats per Megawatt (Fall)	Estimated Total Bats	Species Composition	Bats per Year	Take Estimate
Indiana bat	8.77	859.60	0.0003	0.26	0
northern long-eared bat	8.77	859.60	0.0006	0.52	1

Table 5. The 3-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 2022–2024.

Year	Indiana Bats per Year	Northern Long-eared Bats per Year
2022 ¹	0.09	0.17
2023 ¹	0.23	0.47
2024 ¹	0.26	0.52
Overall Average	0.19	0.38

¹ Species composition estimates from 2022–2024 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.

GenEst = a generalized estimator of fatality.

Probability of Detection

The overall probability of detecting a single bat carcass (g), such as an Indiana or northern long-eared bat, during fall 2024 was 0.05 (95% credible interval [CrI]: 0.050–0.060; Table 6). The rolling average g was 0.05 (95% CrI: 0.040–0.050). The cumulative g (or average g to date) over the past seven years of monitoring was 0.14 (95% CrI 0.120–0.160; 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 p for the Hoopeston Wind Project, Vermilion County, Illinois, from 2018–2024.

Year	B_a^1	B_b^1	p^2	g	95% Credible Interval
2018	181.13	1,208.60	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	1,374.31	26,468.23	1	0.05	0.047–0.052
2022	77.27	1,797.66	1	0.04	0.033–0.051
2023	89.46	2,071.25	0.961	0.04	0.033–0.050
2024	451.45	7,953.41	0.98	0.05	0.050–0.060
Rolling Average (Last 3 Years)	388.77	8,167.37	NA	0.05	0.040–0.050
Cumulative (Average to date)	164.62	1,000.81	NA	0.14	0.120–0.160

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 p 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), estimated that no more than one Indiana bat and one northern long-eared bat fatalities occurred during the 2018–2024 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 Hoopeston Wind Project, Vermilion County, Illinois, from 2018–2024.

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 and northern long-eared bats were calculated based on the g values from the fall seasons of 2022–2024 (Table 6). The estimated annual fatality rates for Indiana and northern long-eared bats were 1.71 bats per year for each species (Table 8), which is below the expected annual take rate of two Indiana and northern long-eared bats each 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% CrI ($\alpha = 0.1$), $\Pr(\lambda > \tau)$ 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 Hoopeston 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	1.71	2	0.47
EoA – northern long-eared bat (50 th credible bound)	0	1.71	2	0.47

EoA= Evidence of Absence.

Projected Mortality for the Remainder of the Project Incidental Take Permit

No Indiana or northern long-eared bat carcasses were found during any year of monitoring at the Project. EoA provides potential estimates of Indiana 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% CrI for both Indiana and northern long-eared bats was 43 Indiana bats and northern long-eared bat fatalities each (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	43
EoA – northern long-eared bat ($\alpha = 0.5$)	0	60	43

EoA= Evidence of Absence.

Summary of Incidental Take Permit Compliance

The estimated median Indiana and northern long-eared bat annual take, based on monitoring studies from 2022–2024, 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 (Tables 5 and 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 2024 (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)	0.19	0.38	No
OR				
Estimated median 3-year fatality rate (λ)	Pr ($\lambda > 2$) >0.9	1.71	1.71	No
AND				
Projected mortality for the remainder of the Project	>60 individuals	43.00	43.00	No
Overall				No

¹ Summary from Tables 5, 8, and 9.

DISCUSSION

The study objectives were to estimate Indiana 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 have been found to date. The estimated level of Indiana 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 or northern long-eared bat carcasses were found during seven years of ITP-monitoring at the Project. The average fatality rates for Indiana and northern long-eared bats are estimated as less than two bats each using both the Species Composition Approach and EoA. 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 Hoopeston Wind Project, Vermilion County, Illinois, during 2024.

Appendix A. Carcasses found at the Hoopeston Wind Project, Vermillion County, Illinois, from April 1 – October 15, 2024.

Date Found	Species	Distance from Turbine (m)	Turbine ID	Search Area Type	Physical Condition	Longitude	Latitude
Bats							
04/20/2024	silver-haired bat	25	49	road and pad	intact	-87.71580	40.38182
05/09/2024	silver-haired bat	52	14	road and pad ¹	scavenged	-87.79617	40.39777
05/09/2024	silver-haired bat	19	20	road and pad	scavenged	-87.79179	40.38536
05/10/2024	eastern red bat	59	33	road and pad	scavenged	-87.76896	40.39739
05/10/2024	silver-haired bat	12	42	road and pad	scavenged	-87.74173	40.40207
05/10/2024	silver-haired bat	35	43	road and pad	scavenged	-87.73755	40.40613
06/06/2024	eastern red bat	59	11	road and pad ¹	intact	-87.80343	40.36991
06/06/2024	eastern red bat	33	12	road and pad	dismembered	-87.80037	40.39773
06/06/2024	silver-haired bat	50	38	road and pad	intact	-87.75125	40.38344
07/16/2024	big brown bat	8	14	road and pad	scavenged	-87.79565	40.39796
07/30/2024	hoary bat	31	2	road and pad	scavenged	-87.82884	40.40254
08/03/2024	eastern red bat	3	43	road and pad	intact	-87.73752	40.40647
08/06/2024	evening bat	23	11	road and pad	scavenged	-87.80402	40.36975
08/06/2024	silver-haired bat	5	23	road and pad	scavenged	-87.78563	40.38263
08/09/2024	hoary bat	14	36	road and pad	scavenged	-87.75297	40.36686
08/09/2024	hoary bat	14	48	road and pad	scavenged	-87.72090	40.38227
08/09/2024	hoary bat	1	49	road and pad	scavenged	-87.71582	40.38209
08/14/2024	eastern red bat	50	12	road and pad	dismembered	-87.80019	40.39773
08/14/2024	eastern red bat	14	14	road and pad	dismembered	-87.79577	40.39804
08/14/2024	eastern red bat	56	6	road and pad	scavenged	-87.81571	40.39621
08/15/2024	eastern red bat	4	41	road and pad	intact	-87.74403	40.36788
08/15/2024	eastern red bat	70	41	road and pad	intact	-87.74486	40.36791
08/15/2024	eastern red bat	5	49	road and pad	intact	-87.71589	40.38208
08/21/2024	eastern red bat	6	4	road and pad	scavenged	-87.81937	40.40355
08/22/2024	big brown bat	17	44	road and pad	scavenged	-87.73719	40.38300
08/22/2024	hoary bat	80	48	road and pad	injured	-87.72083	40.38159
08/22/2024	silver-haired bat	34	52	road and pad	intact	-87.75410	40.37612
08/26/2024	eastern red bat	50	11	road and pad	intact	-87.80386	40.36997
08/26/2024	eastern red bat	59	5	road and pad	scavenged	-87.81577	40.38972
08/29/2024	big brown bat	10	38	road and pad	intact	-87.75096	40.38311
08/29/2024	eastern red bat	5	21	road and pad	scavenged	-87.78989	40.39928
08/29/2024	silver-haired bat	31	47	road and pad	scavenged	-87.72124	40.39332
09/02/2024	silver-haired bat	20	9	road and pad	scavenged	-87.80573	40.40943
09/05/2024	eastern red bat	37	21	road and pad	scavenged	-87.78990	40.39959
09/05/2024	eastern red bat	3	46	road and pad	scavenged	-87.72129	40.4056

Appendix A. Carcasses found at the Hoopeston Wind Project, Vermillion County, Illinois, from April 1 – October 15, 2024.

Date Found	Species	Distance from Turbine (m)	Turbine ID	Search Area Type	Physical Condition	Longitude	Latitude
09/09/2024	eastern red bat	33	20	road and pad	scavenged	-87.79192	40.38537
09/16/2024	silver-haired bat	32	10	road and pad	scavenged	-87.80068	40.40948
09/16/2024	silver-haired bat	41	18	road and pad	intact	-87.79192	40.3695
09/16/2024	silver-haired bat	54	2	road and pad	scavenged	-87.82856	40.40255
09/16/2024	silver-haired bat	33	20	road and pad	scavenged	-87.79193	40.38537
09/16/2024	silver-haired bat	52	31	road and pad	scavenged	-87.77412	40.41977
09/16/2024	silver-haired bat	24	7	road and pad	scavenged	-87.81348	40.38435
09/19/2024	eastern red bat	51	45	road and pad	scavenged	-87.73545	40.39569
09/19/2024	silver-haired bat	38	33	road and pad	scavenged	-87.76865	40.39739
09/23/2024	hoary bat	9	2	road and pad	scavenged	-87.82921	40.40264
09/23/2024	silver-haired bat	27	2	road and pad	intact	-87.82892	40.40252
09/26/2024	silver-haired bat	1	27	road and pad	intact	-87.78203	40.39947
09/26/2024	silver-haired bat	3	39	road and pad	scavenged	-87.74916	40.38833
09/26/2024	silver-haired bat	3	39	road and pad	scavenged	-87.74909	40.38840
09/26/2024	silver-haired bat	1	45	road and pad	intact	-87.73487	40.39572
09/26/2024	silver-haired bat	25	46	road and pad	intact	-87.72132	40.40545
09/26/2024	silver-haired bat	9	49	road and pad	scavenged	-87.71580	40.38197
09/26/2024	unidentified non-myotis	5	49	road and pad	injured	-87.71585	40.38200
09/30/2024	silver-haired bat	4	4	road and pad	scavenged	-87.81941	40.40345
10/09/2024	silver-haired bat	0	24	road and pad	injured	-87.78462	40.42521
10/09/2024	silver-haired bat	6	9	road and pad	scavenged	-87.80591	40.40943
10/15/2024	eastern red bat	4	17	road and pad	intact	-87.79569	40.37517
10/15/2024	silver-haired bat	0	24	road and pad	scavenged	-87.78461	40.42518
Birds							
06/20/2024	yellow-billed cuckoo	81	27	road and pad	dismembered	-87.78200	40.40022
09/05/2024	ruby-throated hummingbird	3	37	road and pad	scavenged	-87.75378	40.39201
09/19/2024	red-eyed vireo	44	41	road and pad	scavenged	-87.74455	40.36792
10/03/2024	ruby-crowned kinglet	38	38	road and pad	scavenged	-87.75124	40.38293
10/10/2024	mourning dove	4	21	road and pad	intact	-87.78988	40.39929
10/15/2024	brown creeper	86	42	road and pad	scavenged	-87.74185	40.40125
10/15/2024	golden-crowned kinglet	66	43	road and pad	scavenged	-87.73755	40.40578

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 Hoopeston Wind Project, Vermilion County, Illinois.**

Appendix B1. Searcher efficiency models for bats from the Hoopeston Wind Project, Vermilion County, Illinois, from spring, summer, and fall (April 1 – 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 Criterion; k = detection reduction factor.

Appendix B2. Carcass persistence models with covariates and distributions for bats at the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024 (n = 15).

Location Covariates	Scale Covariates	Distribution	AICc	Delta AICc
No Covariates	–	exponential	67.35	0*
No Covariates	No Covariates	Weibull	69.18	1.83
No Covariates	No Covariates	loglogistic	69.26	1.91
No Covariates	No Covariates	lognormal	69.47	2.12

* Selected model.

AICc = corrected Akaike Information Criterion.

Appendix B3. Carcass persistence top models with covariates, distributions, and model parameters for the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024.

Distribution	Estimated Median Removal Times (days)	Parameter 1	Parameter 2
exponential ¹	17.35	rate = 0.04	–

¹. The distribution follows base R parameterization.

**Appendix C. Inputs Used to Calculate Bat Fatality Rates at the Hoopeston Wind Project,
Vermilion County, Illinois, Using GenEst (a Generalized Estimator of Fatality).**

Appendix C. Estimated bat fatality rates and adjustment factors, with 90% confidence intervals (CIs) at the Hoopeston Wind Project, Vermillion County, Illinois, from April 1 – October 15, 2024.

	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	0.87	0.80–0.92	0.87	0.80–0.92	0.87	0.80–0.92
Probability of Available and Detected	0.85	0.77–0.91	0.85	0.77–0.91	0.85	0.77–0.91
Estimated Fatality Rates (Fatalities/Turbine/Season(s))	1.87	0.72–3.38	1.94	0.77–3.52	17.54	13.51–22.41
Estimated Fatality Rates (Fatalities/Megawatt/Season(s))	0.93	0.36–1.69	0.97	0.38–1.76	8.77	6.75–11.21

**Appendix D. Inputs and Results for the Single Class Module in Evidence of Absence for
the Hoopeston Wind Project, Vermilion County, Illinois.**

Appendix D1. Inputs needed to run Evidence of Absence: Single Class Module for the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024.

Season	Search Area Type ¹	Search Interval (I)	# of Searches ²	Spatial Coverage (a)	Temporal Coverage (v)	Searcher Efficiency ³		Carcass Persistence ³			
						Carcasses Available	Carcasses Found	Shape (α)	Scale (β)	Scale Lower Limit (β)	Scale Upper Limit (β)
Fall 1	95-m roads and pads	7	12	0.064	1	129	122	Null	25.03	13.46	46.57

$k = 0.8$; m = meter.

1. Scheduled searches at Turbine 1 were missed for the majority of the fall (eight searches), so a sub-season (fall 2; n = 1) was added to account for the missed searches. Turbines included in fall 2 (n = 48) were regularly searched.
2. 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. Weights used for the Evidence of Absence Multiple Class Module to combine detection probability distributions across strata within the fall season for the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024.

Season	Search Area Type	MW	Seasonal Arrival Proportion	Relative Operation of Turbines	Risk Turbine Weight	Sampling Weight	Weight (DWP) ¹
Fall	road and pad	2.00	1.00	1.00	1.00	1	1

1. The density-weighted proportion (DWP) is the fraction of carcasses expected within the stratum.

MW = megawatt.

Appendix D3. Inputs for the Evidence of Absence Multiple Class Module used to combine detection probability distributions across strata within fall for the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024.

Season	Search Area Type	MW	# of Turbines	Weight (DWP) ¹	Ba ²	Bb ²	g (95% CrI) ³
Fall	road and pad	2.00	48	1	451.45	7953.41	0.05 (0.05–0.06)

1. The density-weighted proportion (DWP) is the fraction of carcasses expected within the stratum.
2. Ba and Bb are the α and β parameters of a beta distribution describing the detection probability distribution.
3. CrI = credible interval.

MW = megawatt.

To combine sub-season detection probabilities within fall, seasonal arrival proportion, relative operation of turbines, risk turbine weight, and re-scaled season weight were all set to 1.00.

Appendix D4. Inputs for the Evidence of Absence Multiple Class Module used to combine detection probability distributions across sub-seasons within seasons for the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024.

Season	Weight (DWP) ¹	Ba ²	Bb ²	g (95% CrI) ³
Fall	1.00	451.42	7953.41	0.05 (0.05–0.06)

¹. The density-weighted proportion (DWP) is the fraction of carcasses expected within the stratum.

². Ba and Bb are the α and β parameters of a beta distribution describing the detection probability distribution.

³. CrI = credible interval.

Appendix D5. Results from the Evidence of Absence: Single Class Module for the Hoopeston Wind Project, Vermilion County, Illinois, from August 1 – October 15, 2024.

Year	g	95% Confidence Interval	Ba ¹	Bb ¹
2024	0.05	0.050–0.060	451.42	7953.41

g = the probability of detection.

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