



**IBERDROLA
RENEWABLES**

Adapting the Avian Protection Plan Model to Wind Energy

Presentation to the Wind Turbine
Guidelines Federal Advisory Committee



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Avian Protection Plan Model—Good Fit for Wind?

Reasons the APP model has been attractive to some utilities:

- Provides a tool for avian risk reduction and compliance with the Migratory Bird Treaty Act (and other wildlife statutes)
- Allows each utility to tailor the plan to its own situation (scaled at utility or operating unit level)
- Provides for a systematic approach for addressing existing high-risk lines over time and plan for new lines
- Provides for self-certification, with reporting to the USFWS

Challenges with the APP model as applied to wind:

- No wind-specific guidelines or examples available
- Easier to address new facilities than existing facilities
- Broader range of avian issues for wind energy than for transmission/distribution
- USFWS also interested in addressing bat issues
- Apply at project or corporate level or both?

Development of IBR Avian and Bat Protection Plan

- Began with “translation” of APP guidelines
- Drafted over 1/2008 to 10/2008 period
- Internal team included development, operations, asset management, EHS, and legal
- USFWS review team included Ecological Services, Law Enforcement, and field staff
- IBR expects to update once USFWS Guidelines are revised; then revisit regularly

Avian Protection Plan Guidelines (APLIC/USFWS 2005): APP Principles

1. Corporate Policy
2. Training
3. Permit Compliance
4. Construction Design Standards
5. Nest Management
6. Avian Reporting System
7. Risk Assessment Methodology
8. Mortality Reduction Measures
9. Avian Enhancement Options
10. Quality Control
11. Public Awareness
12. Key Resources



APP Principles Applied to Wind (IBR Avian and Bat Protection Plan Table of Contents)

1. **Corporate Policy** —commitment to implement ABPP, signed by CEO
2. **Site Suitability Assessment and Project Design**
 1. **Preliminary Site Assessment** —early information-gathering with agencies and NGOs; review of wildlife issues before irretrievable commitment of resources to a project
 2. **Preconstruction Studies** —tailored to the project issues; normally one year of pre-construction monitoring (more or less depending on site and available relevant data)
 3. **Site Design** —BMPs

ABPP Table of Contents (con't.)

3. Wildlife Considerations at Operating Projects
 1. Post-Construction Monitoring —will be done at most projects
 2. Reporting —IBR will pilot-test on-line reporting system with USFWS; annual reporting to USFWS
 3. Impact Assessment —unexpectedly high mortality will be trigger to review causes in discussion with agencies
 4. Nest Management —minor issue for wind projects
4. Mortality Reduction, Mitigation, Research and Other Initiatives
 1. Impact Reduction and Mitigation Measures—commitment to address avian and bat mortality; enumeration of range of tools
 2. Research—support for cooperative research and AWWI
 3. Other Initiatives—guidelines processes, FAC, etc.

ABPP Table of Contents (con't.)

5. **Permit Compliance** —processes to assure permit compliance
6. **Implementation**
 1. **Training** —field staff and management
 2. **Quality Control**—audit of processes; revisions to ABPP
 3. **Key Resources** —key internal staff resources
 4. **Public Awareness** —company preference for transparency
 5. **Implementation Schedule** —will apply to new projects coming on line after 1/2010; existing projects during 2009

ABPP Implementation

1. Goal is to develop project-specific ABPPs for each project during 2009
 - Project ABPPs implement processes of corporate ABPP
 - Scale and complexity matched to project
2. Will add staff to implement ABPP



Conclusions about IBR's ABPP Document

- ABPP includes a commitment to agency and NGO contact at key points in the development process, but there is no “approval process” for project-specific ABPPs.
- ABPP includes a significant commitment to reporting to the USFWS and addressing avian and bat impacts from all projects.
- ABPP provides for consistency of effort and attention across all IBR projects, but also provides for tailoring efforts to project-specific issues.
- The ABPP will increase our costs of development and operations, but promises to reduce avian and bat risk, and our risk, over the long term.

Other Implications

- ABPP is one possible model for Guideline implementation—it does not replace Guidelines
- Could the FAC and USFWS develop an ABPP framework that could provide a mechanism for protection under the MBTA?

