Appendix D

Comments and Responses to Comments (continued)

Appendix D.3

Comment Letters

Comments Received from

Groups, Organizations, and Companies

Continued



Multiagency Avian-Solar Collaborative Working Group: Stakeholder Workshop

Welcome and Overview of Workshop Objectives

Dan Boff
U.S. Department of Energy
SunShot Initiative

May 10-11, 2016
Sacramento, California



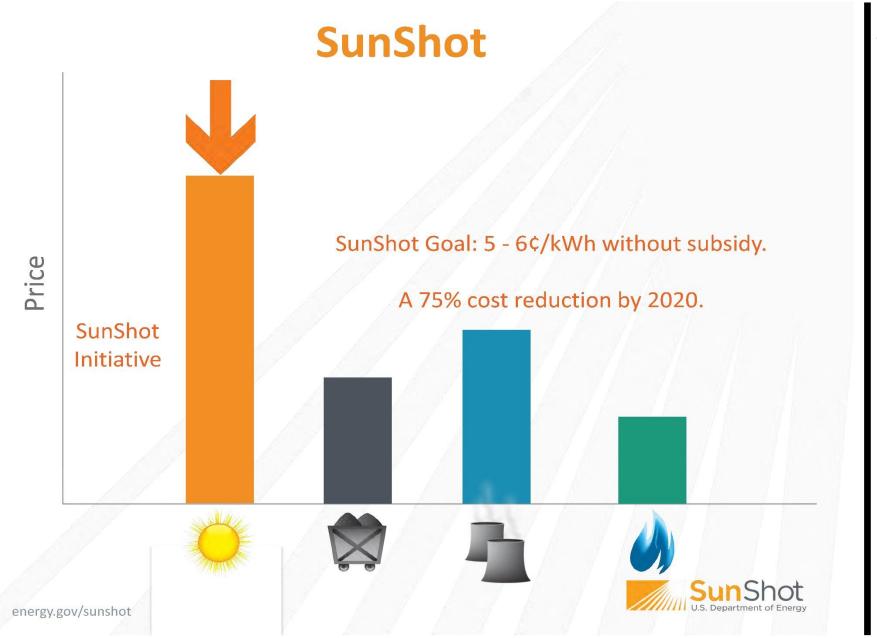








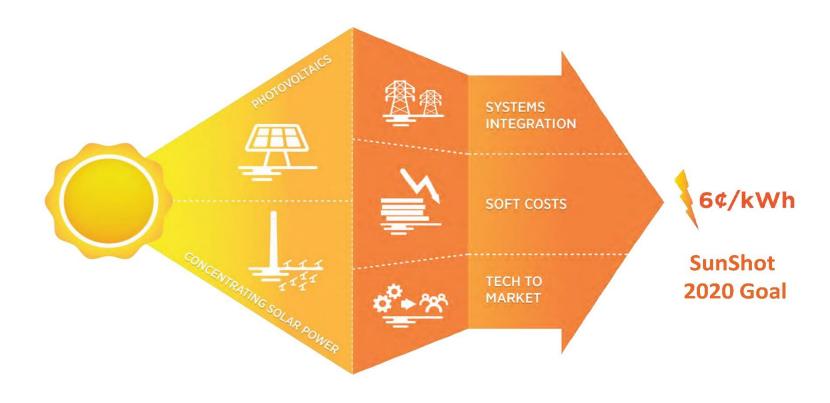
B5-122





SunShot Program Structure

B5-122 cont.



energy.gov/sunshot

B5-122 cont.

Balance of Systems (Soft Costs)



B5-122 cont.

Objectives of this Meeting

Bring together CWG members and stakeholders to:

- Share information about the CWG objectives, scope, activities, and timeline
- Provide a forum for stakeholders to provide comments relevant to the CWG efforts:
 - Concerns about avian-solar issues
 - Relevant existing data and studies
 - Understanding of avian-solar interactions
 - Focus of future research
 - Priorities for research needs
 - Future activities of the CWG

Multiagency CWG Stakeholder Workshop, May 2016

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Agenda - Day 1

Time Slot	Topic
9:30-10:00	Welcome & Workshop Objectives
10:00-10:30	Information About the Multiagency CWG
10:30-10:45	Break
10:45-11:00	Summary of Available Avian-Solar Information
11:00-12:30	Lunch
12:30-2:15	Ongoing Related Initiatives
2:15-2:30	Break
2:30-4:30	Break-out Discussions
4:30-5:00	Wrap Up

Multiagency CWG Stakeholder Workshop, May 2016

Agenda - Day 2

Time Slot	Topic
9:00-9:15	Recap of Day 1
9:15-9:45	Conceptual Framework of Avian-Solar Interactions
9:45-10:15	Agency Management Questions & Related Research Needs
10:15-10:30	Break
10:30-12:30	Break-out Discussions
12:30-1:00	Wrap Up & Next Steps

B5-122 cont.

Multiagency CWG Stakeholder Workshop, May 2016

B5-122 cont.

Logistical Details

- All handouts and presentations will be available on the CWG webpage: http://blmsolar.anl.gov/program/avian-solar/
- If you want to continue to receive information about the CWG efforts, subscribe for email updates
 - Send request to <u>rollins@anl.gov</u>
- Using the microphone ensures everyone can hear you
- Identify yourself and your affiliation when you speak
- Please mute or turn off cell phones

Multiagency CWG Stakeholder Workshop, May 2016

November 2021

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B5-122 cont.

Information About the Multiagency Avian-Solar Collaborative Working Group (CWG)

Greg Helseth Bureau of Land Management

Multiagency CWG Stakeholder Workshop May 10-11, 2016



Background

- Avian-solar concerns that have emerged in the past 2-3 years present potential barriers to utility-scale solar development
- Existing data are inadequate to define the magnitude and extent of potential avian impacts and causal factors
- Research is underway by multiple parties, including federal and state agencies, industry, and academics
- There is a growing consensus regarding the value of collaborating on defining research objectives and data needs, and on allocation of funding

B5-122 cont.

Goal and Objectives

To develop better information to support future agency decisions regarding potential avian impacts at utility-scale solar facilities

OBJECTIVES

- Establish collaborative working group among federal and state agencies
- Develop multiagency avian-solar science plan
 - Document current and planned research activities
 - Identify cost implications and information gaps
 - Identify agency roles in funding and oversight
 - Develop feasible mitigation measures, if warranted
- Prepare education and outreach materials

Multiagency CWG Stakeholder Workshop, May 2016

CWG Members

Representatives of federal and state agencies with relevant missions and/or project authorization responsibilities

Federal Agencies	State Wildlife and Energy Agencies *
DOE Solar Energy Technologies Office	AZ Game and Fish Dept.
Bureau of Land Management	CA Dept. Fish and Wildlife
U.S. Fish and Wildlife Service	CA Energy Commission
U.S. Geological Survey	NV Dept. Wildlife
DOI Solicitor's Office	
U.S. Department of Defense	

^{*} Other state energy agencies have been invited to participate

Multiagency CWG Stakeholder Warkshop, May 2016

B5-122 cont.

Scope and Organization of the CWG

Scope

- Utility-scale solar technologies
 - All technologies
 - All facility components
- Initial geographic focus: Arizona, California, and Nevada

Organization

- CWG is led by a chair and co-chair
- Technical support and facilitation is provided by Argonne National Laboratory and the National Renewable Energy Laboratory

Multiagency CWG Stakeholder Workshop, May 2016

CWG Tasks, Deliverables, and Timeline

Task	Activities	Milestone(s) / Deliverable(s)
1 Establish the CWG and conduct meetings	Formalize CWG. Conduct quarterly CWG and stakeholder meetings.	Establish CWG charter, quarterly CWG meetings, and stakeholder events
2 Develop an Avian-Solar Science Plan	Summarize current activities, information gaps, and research needs; consolidate data and mitigation measures/BMPs. Develop hypothesis-based science plan applicable to all solar technologies and sites.	Avian-solar science plan by end of Oct. 2016
3 Prepare education and outreach materials	Prepare fact sheets or news items to inform the public of CWG activities, avian-solar data, and clarify information.	At least two in FY16: • Fact sheet • News item • Public webinar

Timeline & Progress in 2016

Red - complete; Black - anticipated

March July-Oct February May June January April Recruited Finalized Published 1st Finalized Hold 1st Draft science Revise & workshop public fact sheet plan finalize Charter agency participation agenda workshop science plan Assembled Launched CWG website · Hold public existing Developed Incorporate Held CWG kickoff information CWG MQs stakeholder workshop or meeting input webinar Developed conceptual framework Finalize MOs Release final & research public needs outreach publication

CWG = collaborative working group, MQ = management question

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Avian-Solar Science Plan

Kirk LaGory, Argonne National Laboratory

Purpose: Provide a consistent framework for research and monitoring of avian-solar interactions

Objectives

- Define research questions and future research needs;
- Support development of monitoring protocols, evaluation of avian risk, and development of effective mitigation measures;
- Qualitatively discuss potential associated costs; and
- Define agency roles and processes for implementation.

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Elements of an Avian-Solar Science Plan

Executive Summary

Introduction

- Describe current solar energy development and trends, observed avian-solar interactions
- Describe objectives of the plan, desired outcomes, CWG
- Identify agency-specific management questions

Conceptual Framework of Avian-Solar Interactions

- Provides framework for science plan
- Impacting factors
- Technology-specific impacts
- Direct, indirect, and cumulative effects
- Factors that contribute to risk, including location, seasonality, type of birds
- Local and population-level effects

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B5-122 cont.

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Elements of an Avian-Solar Science Plan (Cont.)

Summary of Existing Information

- High-level summary with focus on published DOE "rapid report" and subsequent findings, technical reports, and communications with researchers
- Which portions of the conceptual model are best understood?

Information Gaps Related to Avian-Solar Interactions

- Identify the information gaps that impede development of effective avoidance, minimization, and mitigation strategies
- Which portions of the conceptual model are poorly understood?

cont.

B5-122

Elements of an Avian-Solar Science Plan (Cont.)

Research and Monitoring Needs

- Based on management questions, conceptual model, and information gaps, identify research and monitoring that is needed to understand avian-solar interactions
- Identify priorities for research and monitoring activities based on relative risk to birds

Program Implementation

- Identify best approaches to research and monitoring
- Agency roles
- Collaboration with ASWG and other stakeholders to ensure consistency and complementary activities
- Role of adaptive management
- Tiering from the plan
- Approximate costs of activities

Stakeholder Engagement

- Agencies are seeking input from stakeholders on all matters relevant to the CWG objectives:
 - Concerns about avian-solar issues
 - Relevant existing data and studies
 - Understanding of avian-solar interactions
 - Focus of future research
 - Priorities for research needs
 - Future activities of the CWG
- Stakeholders can comment during this meeting and/or in writing following the workshop (target due date of June 1, 2016)
- A stakeholder webinar will be hosted to present and take comments on the draft avian-solar science plan (late summer 2016)
- For more information:
 - Subscribe for email updates: send request to rollins@anl.gov
 - CWG webpage: http://blmsolar.anl.gov/program/avian-solar/

cont.

B5-122

B5-122 cont.

QUESTIONS?

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B5-122 cont.

A Review of Avian Monitoring and Mitigation Information at Existing Utility-Scale Solar Facilities

Lee Walston*, Katherine Rollins, Karen Smith, and Kirk LaGory Environmental Science Division Argonne National Laboratory Karin Sinclair, Craig Turchi, Tim Wendelin, and Heidi Souder National Renewable Energy Laboratory











^{*} lwalston@anl.gov

What is Utility-Scale Solar Energy Development?

- Large solar fields 10+ megawatt (MW); requires 5-10 acres per MW
- Three main technologies: 1) photovoltaic (PV) and concentrated solar power (CSP) technologies – 2) parabolic trough and 3) power tower



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What is Utility-Scale Solar Development? (cont'd)

B5-122 cont.



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What is Utility-Scale Solar Development? (cont'd)

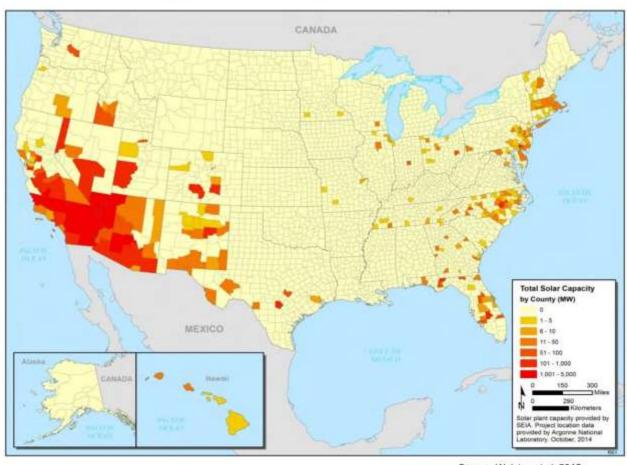




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Utility-Scale Solar Energy Development in the U.S.

- >14 GW utilityscale solar capacity (in operation or under construction)
- >1,200 facilities
 (>1 MW)
- >50% of this electric capacity in southern CA, NV, and AZ.



Source: Walston et al. 2015

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Avian Impacts of Solar Development

2 direct sources of solar-avian fatalities

- Collision-related: documented at solar projects of all technology types.
- Solar flux-related: resulting from the burning/singeing effects of exposure to concentrated sunlight. Observed only at facilities employing power tower technologies.



Photo Credit: Robert Sullivan, Argonne National Laboratory

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Factors that Affect Mortality Risk

- Project location
 - Near aquatic/riparian areas, stopover sites, etc.
- Project size
- Project technology / design
 - PV vs CSP
 - Evaporation ponds
 - Ancillary infrastructure



Copper Mountain PV facility in southern Nevada. Example for the "lake effect" hypothesis. Photo Credit: Robert Sullivan, Argonne National Laboratory

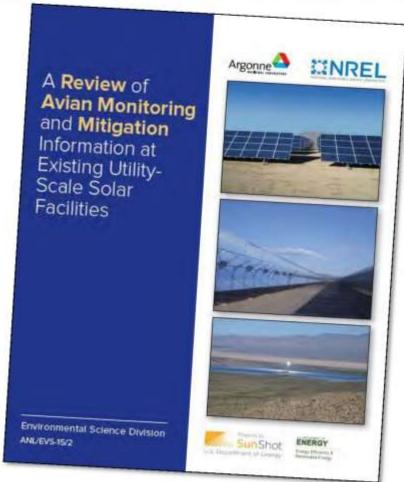
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"A Review of Avian Monitoring and Mitigation Information at Existing Utility-Scale Solar Facilities"

Objectives:

- Summarize avian fatality issues at solar facilities
- Summarize current monitoring and reporting activities
- Evaluate mitigation measures and BMPs used for other industries
- Examine solar technologyspecific aspects of avian fatality
- Identify information gaps and next steps



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Avian Fatality Information at Solar Facilities (updated)

- 16 Facilities with available avian monitoring information.
- Collection of avian fatality information:
 - Incidental or unknown survey effort at 6 facilities
 - Systematic survey effort at 10 facilities

Summary of Current Avian Monitoring Activities at Utility-Scale Solar Facilities as of May 2016

Project Name	Location	Technology Type and MW (in Parentheses)	Current Status	Land Type	Available Avian Monitoring Plan	Known Collection of Avian Fatality Data
Blythe Solar	Riverside County, CA	PV (485)	Under Construction	Public	Yes	Yes – Incidental and systematic
California Solar One	Daggett, CA	CSP – Power Tower (10)	Decommissioned in 1987	Private	NA	Yes – Systematic
California Valley Solar Ranch	San Luis Obispo County, CA	PV (250)	Operational – Oct 2013	Private	Yes	Yes – Systematic
Campo Verde	Imperial County, CA	PV (139)	Operational – Oct 2013	Private	NA	Yes – Incidental
Centinela Solar Energy	Imperial County, CA	PV (170)	Operational – August 2013	Private	Yes	NA
Crescent Dunes	Nye County, NV	CSP – Power Tower (110)	Construction completed	Public	Yes	Yes – Systematic

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B5-122 cont.

Avian Monitoring at Solar Facilities

- Fatality monitoring (and reporting) at very few solar facilities
 - Not required at all facilities
- Differences in monitoring designs and survey effort
 - Affects the ability to compare and integrate data
- Systematic vs. incidental fatality information
 - Systematic information allows hypothesis testing
 - Incidental observations may still be useful in understanding patterns of fatalities



Barn swallow with singed feathers observed at the California Solar One demonstration facility (Source: McCrary et al. 1986).

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Avian Monitoring at Solar Facilities, Cont'd

- Variation in factors influencing mortality rate estimation and evaluation
 - Search effort and searcher efficiency
 - Feather spots
 - Predation and scavenging
 - Potential for predators to influence mortality rates by transporting carcasses to the project footprint from offsite locations
 - Background mortality
 - Mortality estimates at some solar facilities include adjustments for background mortality



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B5-122 cont.

Final EIR

Conclusions & Recommendations

- Avian monitoring
 - Not all utility-scale solar facilities are required to prepare and comply with project-specific avian monitoring protocols
- Existing avian fatality data
 - Standardization is important for integration and comparison
- Flux-related factors (power tower technologies)
 - Various approaches to heliostat standby aiming could significantly reduce flux levels and their impact on avian fatality
- Better collaboration among agencies, industry, and stakeholders to (1) collect scientifically rigorous and comparable data; (2) identify research priorities; and (3) identify appropriate mitigation measures.

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B5-122 cont.

Questions?



Photo Credit: http://cleaneasyenergy.com/

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B5-122 cont.

Presentations on Ongoing Related Initiatives

- 1. Tom Dietsch U.S. Fish and Wildlife Service
- 2. Mona Kahlil U.S. Geological Survey
- 3. Avian Solar Work Group Representatives: Julie Falkner, Defenders of Wildlife and Laura Abram, First Solar
- 4. Tim Wendelin National Renewable Energy Laboratory (NREL)
- 5. Elise DeGeorge NREL





U.S. Fish & Wildlife Service

B5-122 cont.

Update on Solar-Avian Interactions in Southern California

Thomas Dietsch
Migratory Bird Division
US Fish and Wildlife Service
CWG Public Meeting
Sacramento, CA
May 10, 2016



Objectives for Presentation

- Provide a review of solar-avian interactions in Southern California
- Discuss hypotheses for avian interactions
- Provide update on actions being taken

Avian Impacts Direct Effects: Collisions

Collisions with panels are common

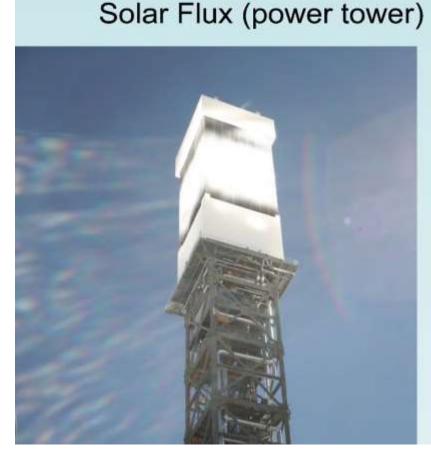






Concentrated Solar Technologies

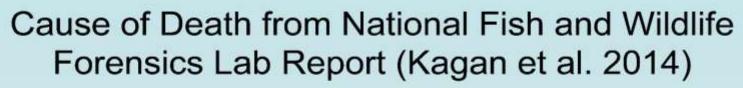
Direct Effects

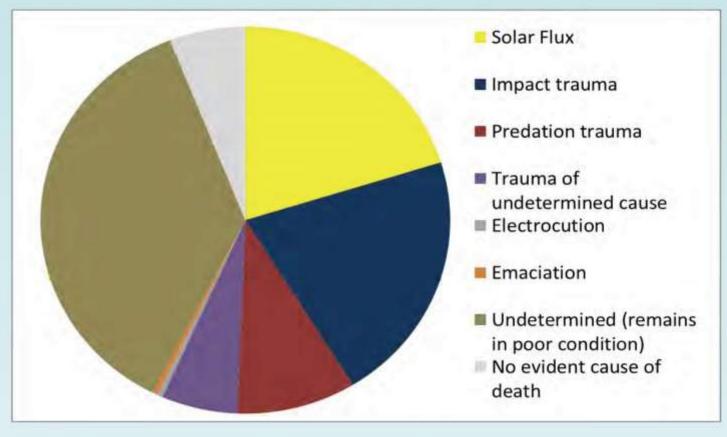




November 2021 D-213 Final EIR







From 3 solar projects, 233 carcasses from 71 species.

Data for Today's Presentation

- Mortality monitoring and reporting is required by lead agencies on many projects.
- Data from 7 projects in Southern California (4 Photovoltaic, 2 Solar Trough, 1 Power Tower)
- Data reported from 2012-April 2016.
- Each species was categorized by habitat, migratory group, and foraging guild.

Caveats on Solar Avian Mortality data

- Data are from a mix of incidental reports and systematic surveys on several projects.
- Magnitude of mortalities are not reported here.
- Only projects in Southern California are included in this presentation.
- Data can provide information on which species or taxonomic groups may be at risk.
- Project features and types of injuries also indicated.

B5-122 cont.

Initial Findings

- National Fish and Wildlife Forensics Lab Report (Kagan et al. 2014)
 - "Significant Bat and Insect Mortality, including Monarch Butterflies".
- 3545 mortalities from 183 species (2012-April 2016)
 - Only mortalities found and reported included, no estimation.
 - Mix of reports from incidental finds and systematic surveys.
 - Many mortalities occur due to dehydration/heat stress after initial injury/stranding.
- Birds of Conservation Concern

Species of Concern

- Federal Endangered/Threatened
 - Yuma Ridgeway's (Clapper) Rail
 - Willow Flycatcher
 - Yellow-billed Cuckoo
- State-listed/Fully Protected
 - Peregrine Falcon
 - Bank Swallow
- 19 Birds of Conservation Concern
 - Western Grebe
 - Horned and Eared Grebes
 - American White Pelican
 - Burrowing Owl
 - Calliope Hummingbird

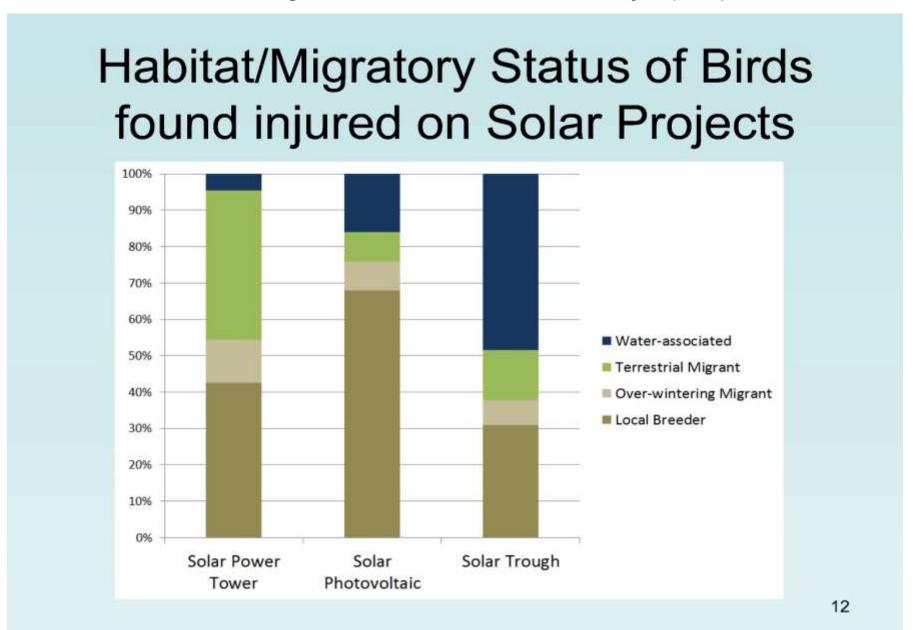


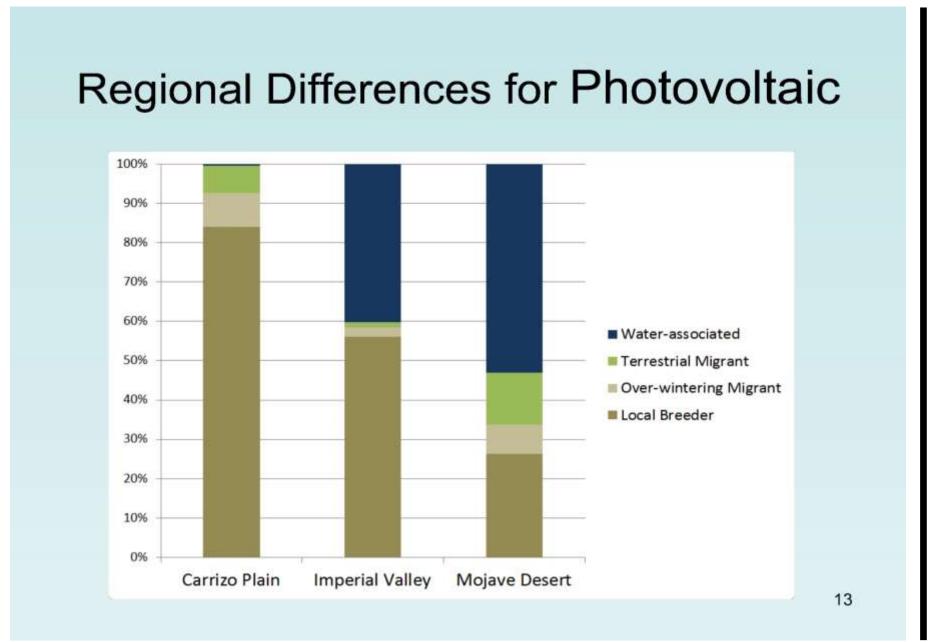
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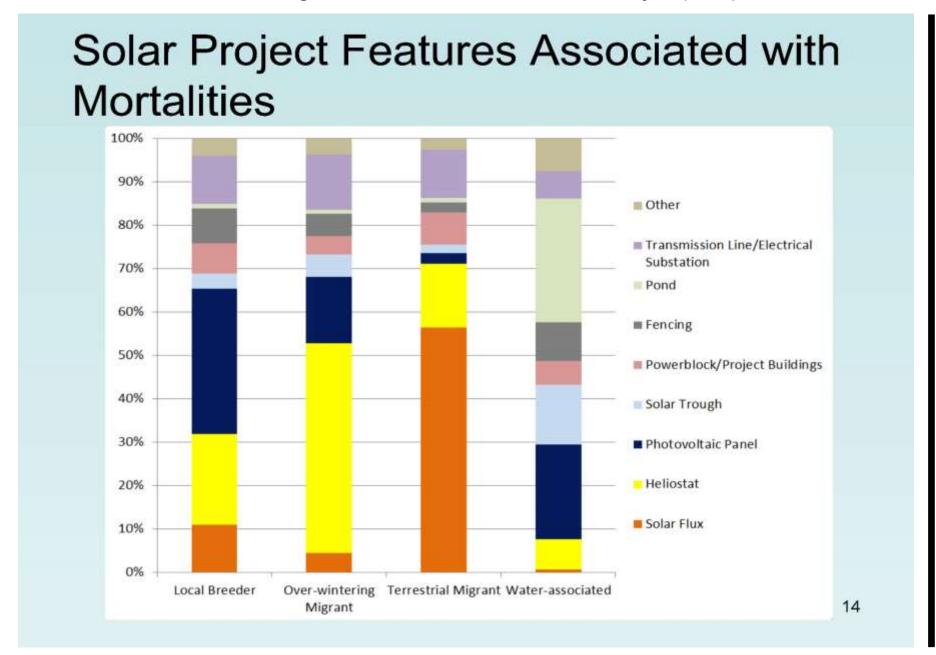
November 2021 D-218 Final EIR

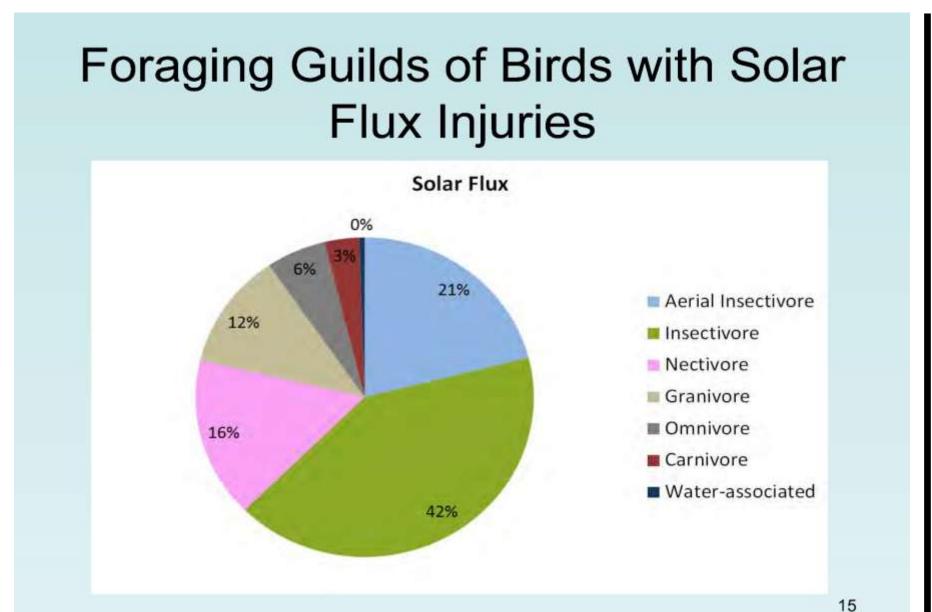
Hypotheses

- Mortalities represent background mortality.
- Mortalities occur during normal bird movements (Anthropogenic, no landscape-scale attraction).
- Polarized light may attract birds and insects to solar projects in the Mojave Desert (Horvath et al. 2009).
- Other resources attract birds to solar projects (Insects and Ponds).









Findings

- There may be a "lake effect" associated with utility-scale solar projects similar to that described by Horvath et al. 2009.
- Many birds of conservation concern may be at risk.
- Regional (and site-specific) differences may affect which species are at risk.
- Insects may be attracting some birds to areas with elevated levels of solar flux.
- Many species affected are long-distance migrants, thus population level effects may be difficult to determine.
- Robust monitoring needed to better understand these phenomena and to support adaptive management.

Mortality Monitoring Objectives

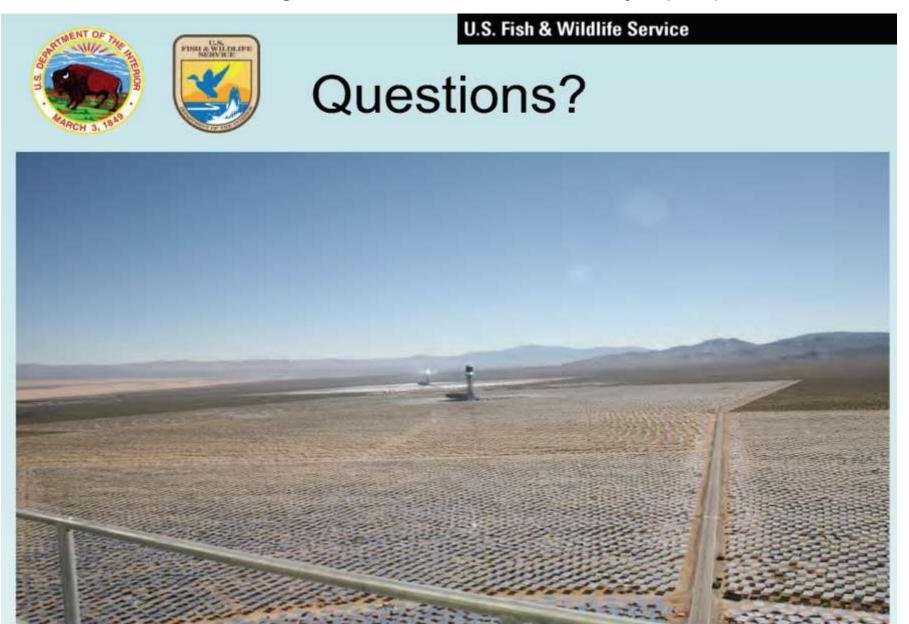
- Estimate the total number of birds and bats killed at a facility within a specified time period.
- Determine whether there are spatial or temporal/ seasonal patterns of total bird fatality.
- Evaluate species composition and which taxonomic groups may be at risk.
- Provide results that allow comparisons with other solar sites and to evaluate changes in fatality due to adaptive management.

Research Needs

- Project-scale information needs
- Mojave and Sonoran Desert Migratory Pathways
- Migratory Connectivity Research to identify populations affected
 - Populations affected may be distant from the source of mortalities
 - Stable Isotopes (USGS)
 - Genotypes (UCLA)
 - Telemetry of appropriate-sized birds
- Avian Behavior related to projects
 - Perception and Settling Response
 - Technological Fixes
- Identify Best Management Practices and Deterrent Methods

Update on actions being taken

- Working with solar industry to implement robust mortality monitoring.
 - Searcher Efficiency and Carcass Persistence Trials.
- Solar Bird and Bat Conservation Strategy Guidelines in development.
 - Public meeting on June 22nd in Sacramento.
- Collaborated with USGS to develop Mortality Monitoring Protocols for Solar
 - Protocols for monitoring at each technology type.
- Coordinating with other agencies to find ways to avoid and minimize avian mortalities.
- Coordinating with Avian Solar Working Group (industry and other stakeholders)
- Supporting ongoing research efforts by USGS and UCLA



cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)



Research to Address Wildlife Interactions with Solar Energy Facilities

Avian-Solar Collaborative Working Group

May 10, 2016

USGS Ecosystems Mission Area



November 2021 D-229 Final EIR

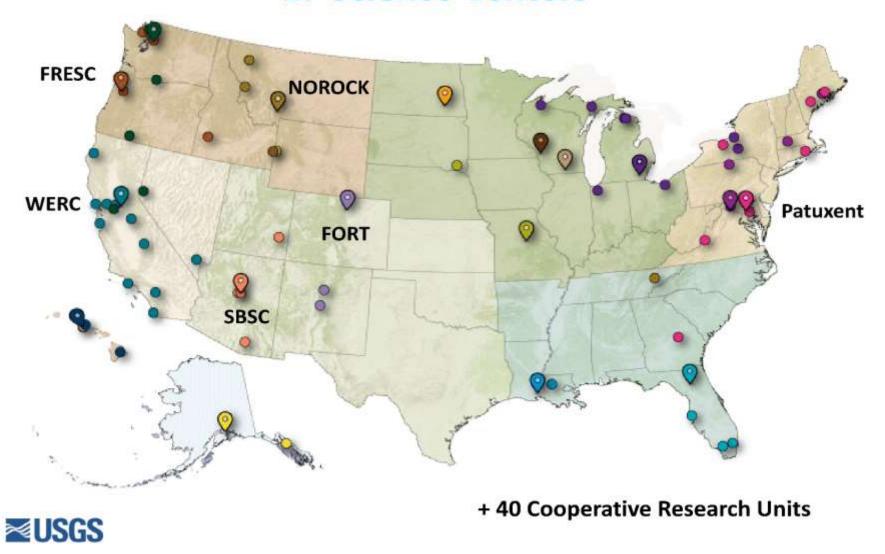
U.S. Geological Survey

Ecosystems

Natural Hazards Energy and Minerals Core Science Systems

Environmental Health Water Climate and Land Use Change

USGS Ecosystems Mission Area 17 Science Centers



Energy and Wildlife Research

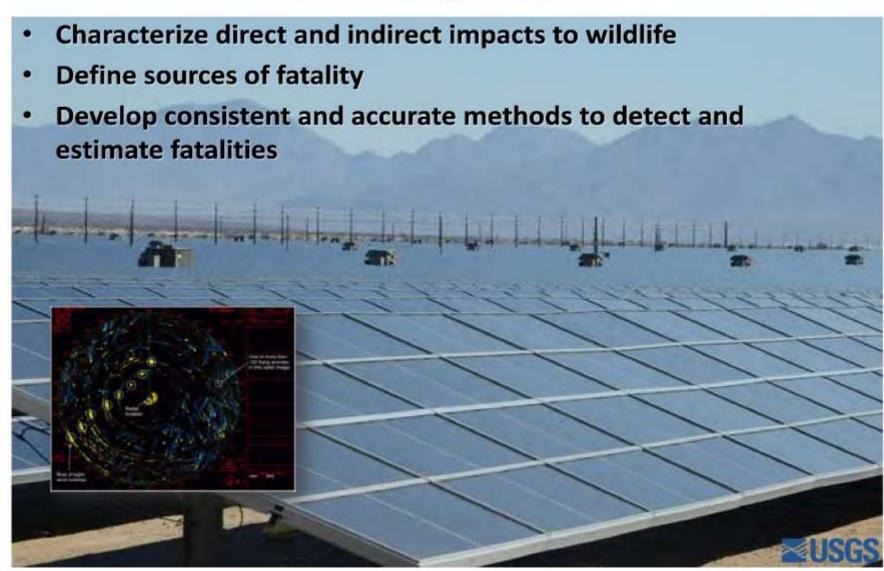
Goals

- Understand risks: when and where wildlife occur and how they use space
- Measure impacts to wildlife, both direct and indirect
- Develop solutions: minimize impacts through technological fixes, management, mitigation





Measuring Impacts



B5-122

cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Efficacy of Wildlife Monitoring Technologies at the Ivanpah Solar Electric Generating System

Objective:

- Evaluate efficacy of monitoring technologies to detect birds, bats, and insects flying in the vicinity of flux fields produced at the ISEGS
- Tested technologies concurrently (portable radar, surveillance video, thermal video). Also performed invertebrate sampling
- Monitoring period covered ~20 days in May and September 2014 during bird migration season
- Developing data handling and analysis software (presence/absence, speed, direction, abundance)

Pls: Robb Diehl (NRMSC), Paul Cryan & Ernie Valdez (FORT)

Status: In review. Full data release will accompany
publication







B5-122 cont.

Monitoring Methodology for Solar Facilities

- No guidance currently exists for addressing wildlife conservation concerns at solar energy facilities
- Published studies have not directly addressed the methodology needed to accurately estimate fatality of birds and bats at solar facilities

Objective:

 Develop monitoring methodology for solar facilities to produce a consistent carcass search methodology

PI: Manuela Huso (FRESC)

Project completion: May 2016



US FWS Pacific Southwest Region



Solar Fatality Estimator and "Evidence of Absence" Software

Need consistent and accurate methods to detect and estimate fatalities from carcass searches at solar facilities

Objective:

- Modify existing software to produce unbiased estimates of fatalities at utilityscale solar facilities and "Evidence of Absence" software for rare species
- Define sources of fatality
- Estimate searcher efficiency and carcass persistence
- Determine when thresholds have likely been exceeded and mitigation might be considered

PI: Manuela Huso (FRESC)

Anticipated completion: April 2017





Ivanpah Solar Electric Generating System



Golden eagle at wind farm in CA. Credit: Jeff Lovich

B5-122

cont.

B5-122

cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Assess Energy Development Impacts to Sensitive Bird and Bat Species and Populations

Need to more accurately estimate fatality rates and effectiveness

of mitigation techniques

Project Objective:

- Estimate geographic scope of species impacted
- Use demographic modeling to assess how fatalities affect population increases or declines
- Determine best practices for conducting risk assessments and predicting mitigation outcomes

PI: Todd Katzner (FRESC)

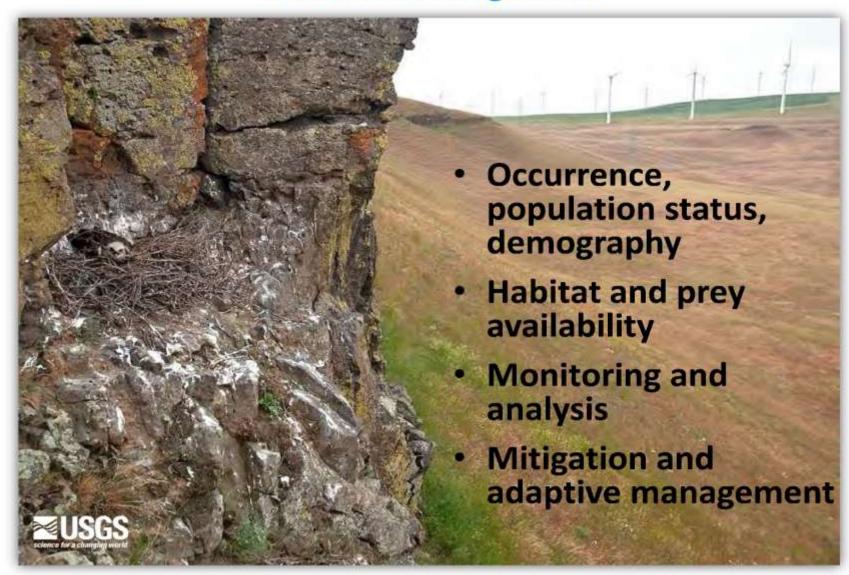
Project period: 2015-2018







Understanding Risks



Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Habitat Modeling to Inform Energy Development

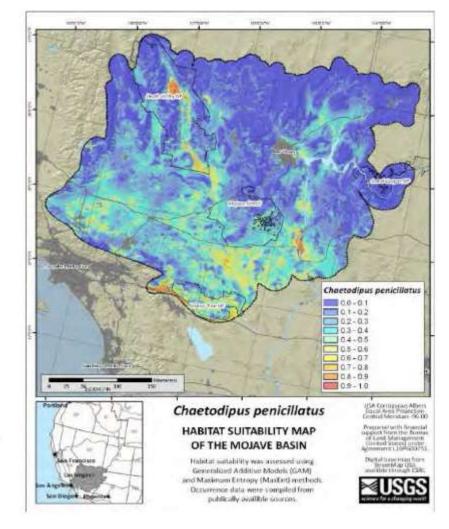
Renewable energy development in the Mojave Ecoregion is creating potential impacts to multiple species of wildlife

USGS Published Research

- Habitat suitability models for over 50 desert plant and animal species can be used to rank potential habitat loss
- Golden eagle status assessments and monitoring protocols

PIs: Todd Esque, Amy Vandergast (WERC)

Publication: Inman, R. D. et al., 2014. Mapping Habitat for Multiple Species in the Desert Southwest. Open File Report 2014-1134.





Linking Habitat and Prey Availability to Golden Eagle Ecology and Solar Energy in the Mojave

Inform energy and land-use planning; assist with delineating conservation and development zones

Objectives:

- Assess food habits, reproductive success and prey availability of nesting golden eagles in the Mojave
- Synthesize and review rabbit distribution and abundance in the Western US
- Develop a regional prey database for rabbit populations across 17 western states

PIs: Kathleen Longshore & Todd Esque (WERC)

Product completion: Spring/Summer 2016







B5-122

cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Surveying and Monitoring Golden Eagles and Other Raptors in the DRECP Area

Effective surveys for eagles and status monitoring and mapping are needed to meet DRECP objectives

Objective:

- Develop survey designs and field procedures to determine the distribution of golden eagles
- Assess their occurrence and nesting success in the DRECP area
- Compile and analyze eagle population data for CA & NV, and the larger context of their full migratory range into a geospatial database

PI: David Wiens (FRESC)

Project Completion: Summer 2016







Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Helping Inform Siting Decisions

What are regional golden eagle nesting and foraging behaviors that may lead to eagle – infrastructure interactions?

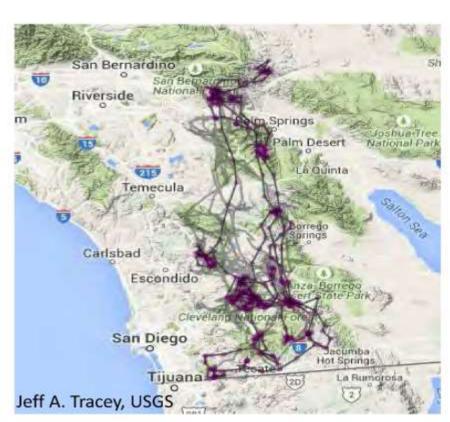
Objectives:

- Population surveys, biotelemetry and genetics
- Focus on occupancy and movement
- Abundance and survival in relation to prey dynamics
- Regional understanding

PIs: Jeff Tracey & Robert Fisher (WERC)

Products: Biotelemetry data for 24 eagles released May 2016





Needs and Future Directions

- Expand research on wildlife interactions with large scale solar power facilities
- Understand direct and indirect effects on species and landscapes
- Expand knowledge of where species are on the landscape
- Continue efforts to develop deterrents to minimize interactions of wildlife with facilities and effective mitigation strategies



B5-122 cont.

USGS Energy and Wildlife Contacts

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Mona Khalil

Energy & Wildlife Specialist Ecosystems Mission Area U.S. Geological Survey (703) 648-6499 mkhalil@usgs.gov



Recent USGS Publications of Relevance to Solar Energy Development

- Braham, M.E., Miller, T.A., Duerr, A., Lanzone, M., Fesnock, A., Lapre, L., Driscoll, D., Katzner, T.E., 2015, Home in the heat- Dramatic seasonal variation in home range of desert golden eagles informs management for renewable energy development. DOI- 10.1016/j.biocon.2015.03.020: Biological Conservation, v. 186, p. 225-232.
- Duerr, A., Miller, T.A., Duerr, K.C., Lanzone, M., Fesnock, A., Katzner, T.E., 2015, Landscape-scale distribution and density of raptor populations wintering in anthropogenic-dominated desert landscapes. DOI- 10.1007/s10531-015-0916-6: Biodiversity and Conservation, v. 24, no. 10, p. 2365-2381.
- Simes, M.T., K.M. Longshore, K.E. Nussear, G.L. Beatty, D.E. Brown, and T.C. Esque, 2015, Black-tailed and white tailed jackrabbits in the American West: History, ecology, significance, and survey methods. Submitted to Western North American Naturalist 75(4):491-521.
 DOI: 10.3398/064.075.0406
- Simes, M.T., K.M. Longshore, K.E. Nussear, G.L. Beatty, D.E. Brown, and T.C. Esque. In Review. An
 annotated bibliography for the black-tailed jackrabbit (Lepus californicus) and white-tailed
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ASWG Mission

The ASWG is a collaborative group of environmental organizations, academics, solar companies, and solar industry representatives that will advance coordinated scientific research to better understand how birds interact with solar facilities. Given the threat that climate change poses to avian species, participants will work with the shared interests of protecting avian species and developing solar projects in an environmentally responsible and a commercially viable manner.

Participants and Roles

- Convener: Large-scale Solar Association
- Facilitation team: Pivot Point
- Decision-making members:
 - Audubon California
 - Defenders of Wildlife
 - Duke Energy
 - First Solar
 - Large-scale Solar Association
 - Natural Resources Defense Counsel
 - NextEra Energy Resources
 - Recurrent Energy
 - SunEdison
 - SunPower

Progress to Date 2016 January February March April ASWG Research ASWG Research panel works meeting with Panel meeting Research independently develops draft Progress Panel (1/13) report ASWG call report on Finalizing Research with research Terms of panel Panel from Reference Science Advisors Multiagency CWG meeting Ongoing Engagement with Multiagency Avian-Solar Collaborative Working Group

ASWG Next Steps 2016 May June July-August ASWG meeting Multiagency ASWG and with research CWG meeting agency (Week of 5/9) panel (6/1-2) observers to meet to discuss Research panel ASWG final report shares draft discussion of Finalize report with priorities **ASWG** priorities after agency input Ongoing Engagement with Multiagency Avian-Solar Collaborative Working Group

Research Panelists

Science Advisors						
Thomas Smith	UCLA	Director, Center for Tropical Research				
Kristen Ruegg	UCLA / UCSC	Institute for the Environment and Sustainability, Center for Tropical Research				
Research Panelists						
Steve Beissinger	UC Berkeley	Professor of Conservation Biology				
Wally Erickson	WEST Consulting	CEO / Senior Statistician				
Vasilis Fthenakis	Brookhaven National Lab	Principal Investigator				
Luke George	Colorado State University	Senior Research Associate				
Rodney Siegel	Institute for Bird Populations	Executive Director				

ASWG Research Questions

I. Siting

- 1) Do avian mortality rates at PV solar power plants differ from background rates at control sites?
- 2) What is the relationship of mortality rates to site characteristics (e.g., panels, fence lines, overhead transmission lines, scale/configuration of installations, proximity to other solar facilities or other natural or human landscape features such as levels of fragmentation and loss of habitat, migratory flyways and stop over sites, etc.)?
- 3) How might siting be optimized to reduce potential impacts on vulnerable bird populations in a cost-effective manner?

B5-122 cont.

ASWG Research Questions

II. Population level effects

- 1) Are solar sites causing avian mortality that is significant at the scale of the population for individual species?
 - a) How should populations be defined in this context?
 - b) What research and data would be required to determine if mortality associated with solar sites is additive or compensatory?
 - c) How do population impacts differ by species, guild, migratory pathway, taxonomic unit and classification (threatened versus non-threatened), etc.?

B5-122 cont.

ASWG Research Questions

III. Lake Effect

- Are water or other birds attracted to solar panels because they perceive them as water bodies (i.e., a "Lake Effect")?
- 2) Is a possible Lake Effect related to geographic and environmental/infrastructure characteristics of sites?
- 3) Do birds show evidence of attraction to large solar arrays (e.g. show changes in flight direction or behavior as they approach arrays)?
- 4) What types of birds are affected?
- 5) Is possible mortality due to stranding, strikes or some other process?
- 6) If the Lake Effect is demonstrated, what cues are causing the birds to mistake the solar array as a water body (e.g., what wavelength of reflected light are they responding to)?
- 7) If a Lake Effect can be demonstrated, how might the threat be mitigated or eliminated?

ASWG Research Questions

IV. Avian attraction/mitigation/deterrents

1) What are the avian risk-reduction options that might lower avian mortality?

V. Feather spots

- 1) What do feather spots represent? Can feather spots be better defined and quantified?
 - a) What methods can be used to identify the species and number of individuals that comprise feather spots? Are feather spots a reliable indicator of avian strikes and/or fatalities.
 - b) Do feather spots from larger carcasses persist in the environment longer than spots from smaller ones?

ASWG Research Questions

VI. Climate change and other broader impacts

- 1) What demographic effects may result from climate change in the absence of large-scale solar development, and how do these compare with the impacts of solar facilities for specific bird populations?
- 2) Using historical and contemporary data on the abundance and distribution of avian species with future climate projections, what are the predictions for the future avian distribution and population trends in California?
 - a) How can this be used to mitigate the impacts of PV facilities?

Achieving Mutual Goals

- Understanding common research interests
- Identifying key priorities
- Identifying funding mechanisms
- Continued collaboration to drive short and long term results



B5-122

View From Above - Full Load - Image Priority Aiming

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Goals

B5-122 cont.

 DOE is funding work to address avian flux hazards

> Develop models and tools to quantify flux (power/unit area) from heliostat aiming strategies

Mitigate impacts of avian (and glare) hazards

 Optimize operational performance

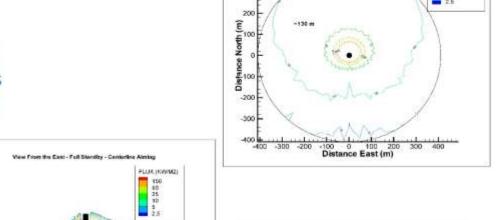






Photo and model of high-flux regions causing solar glare and avian hazards at Ivanpah Solar Electric Generating System

-100 0 100 Distance North (m)

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View From Above - Full Louit - Image Priority Aiming

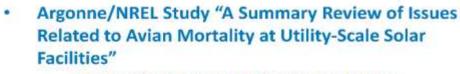
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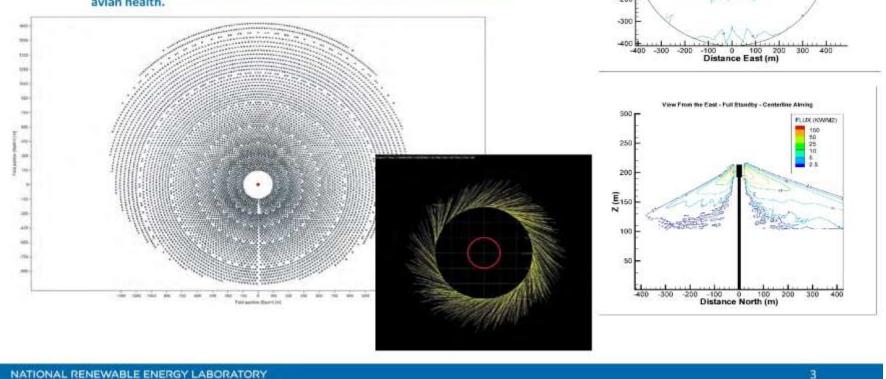
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Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Previous Work



- Preliminary results compare well with previous analyses
- Various approaches to standby aiming can significantly reduce flux levels and their impact on avian mortality.
- Future work recommended to determine the impact of alternative aiming strategies which simultaneously minimize impacts to plant operations and avian health.



Approach

B5-122 cont.

- Identify metrics for safe solar flux levels
- Develop tools to model solar flux in air space around power tower
 - Case studies: Ivanpah and NSTTF at Sandia (for validation)
- Compare alternative heliostat standbyaiming strategies
 - Minimize solar flux according to metrics in (1) above
 - Minimize impact on plant operations
- 4. Develop user friendly assessment tool for agencies/stakeholders



Ivanpah Solar Electric Generating System



National Solar Thermal Test Facility (NSTTF)



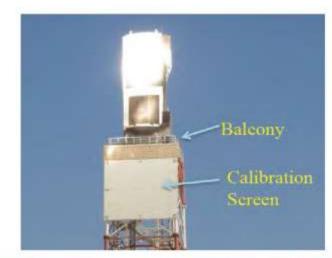
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Solar Energy Development Center (Negev Desert, Southern Israel)

B5-122 cont.

- Tests conducted with bird carcasses exposed to different flux levels (Santolo, 2012)
 - "no observable effects on feathers or tissue were found in test birds where solar flux was below 50 kW/m² with exposure times of up to 30 seconds."
 - California Energy Commission analytical study found that "a threshold of safe exposure does not exist above a solar flux density of 4 kW/m² for a one-minute exposure"

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Final EIR

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Crescent Dunes (SolarReserve)

(Tonopah, Nevada)

- 110 MW_e molten-salt power tower
- In January 2015, 3,000 heliostats were aimed at standby points above receiver
 - 115 bird deaths in 4 hours
 - SolarReserve spread the aim points to reduce peak flux to < 4 kW/m²
 - Reported zero bird fatalities in months following change





Images from http://cleantechnica.com

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Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Ivanpah Solar Electric Generating System

(Ivanpah, California)

- 390 MW, direct steam powertower plant (3 towers)
- Kagan et al. (2014) found 141 bird fatalities Oct 21 - 24, 2013
 - 33% caused by solar flux
 - 67% caused by collisions or predation
- H.T. Harvey and Associates found 703 bird fatalities in first year at ISEGS
 - Study estimated 3500 bird fatalities accounting for search efficiency and scavengers removing carcasses
- ISEGS has since implemented new heliostat aiming strategies and bird deterrents



Cause	Number of Detections					
	Winter	Spring	Summer	Fall	Total	
Singed	27	100	42	147	316	
Collision	14	15	10	45	84	
Other*	5	5	2	3	15	
Unknown	51	82	61	94	288	
Total	97	202	115	289	703	

* Includes detections in ACC buildings without evidence of singeing or collision effects.

H.T. Harvey and Associates, 2013 - 2014

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Gemasolar Thermosolar Plant

(Andalusia, Spain)

- 20 MW_e molten-salt power tower plant
- 14-month study revealed no avian fatalities in vicinity of tower (Dept. of Zoology, U. Granada)



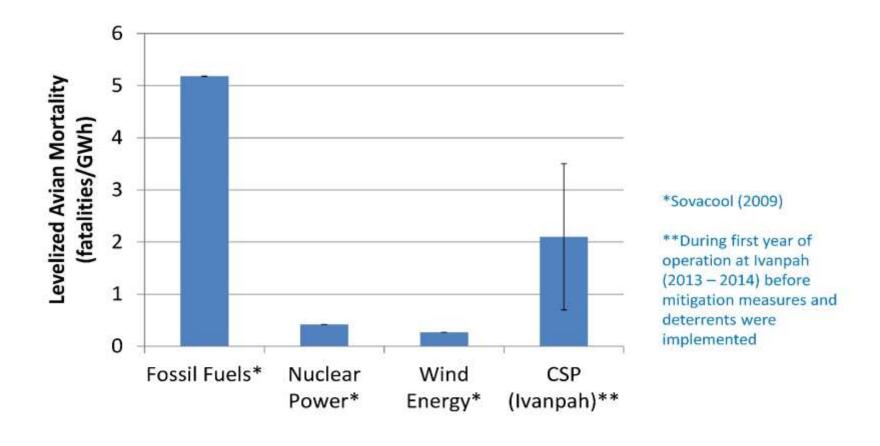
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Levelized Avian Mortality for Energy (LAME)

B5-122 cont.



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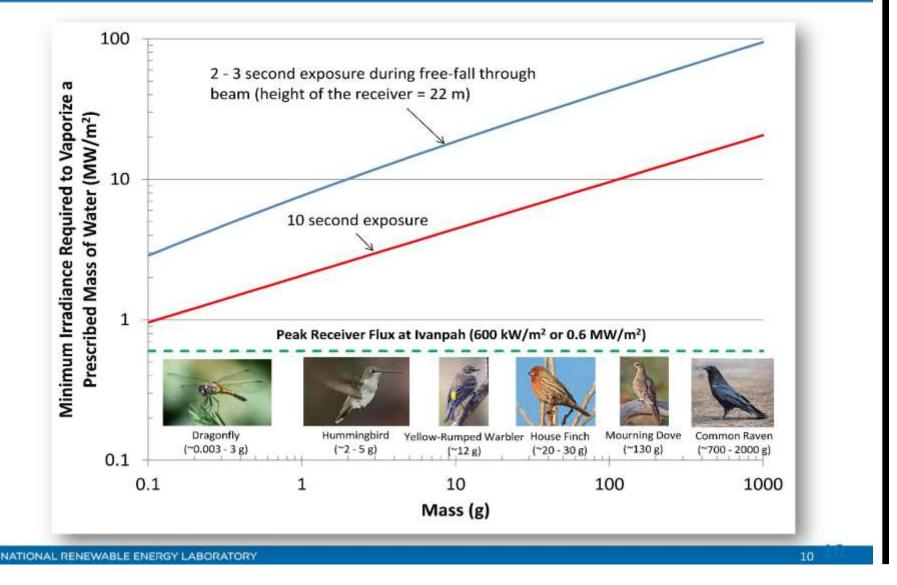
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Feasibility of Bird Vaporization



Final EIR



Deterrents

B5-122 cont.

- Acoustic
 - Painful or predatory sounds
- Visual
 - Intense lights and decoys
- Tactile
 - Bird spikes, anti-perching devices
- Chemosensory
 - Grape-flavored powder drinks (methyl anthranilate)



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Conclusions from prior studies

- The large number of "streamers," or smoke plumes, observed and attributed to vaporization of birds is likely caused by insects flying into the concentrated flux
- Complete vaporization of birds flying into concentrated solar flux is highly improbable
- Safe irradiance levels for birds have been reported to range from 4 kW/m² to 50 kW/m²
- Mitigation measures and bird deterrents can and are being used

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B5-122

cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Flux Hazard Analysis

 Create computer model of baseline power tower design (Ivanpah Unit #2) in

SolarPILOT / SolTrace.

- Heliostat geometry, positions and tower height from NRG.
- Create computer model of National Solar Thermal Test Facility in SolarPILOT / SolTrace.
 - Validate model using flux measurement tools



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Flux Hazard Analysis

cont.

B5-122

- Obtain/establish relevant information/parametric data from industry/stakeholder workshop
 - Baseline/novel aiming strategies.
 - Heliostat control capabilities (slew rates, aiming algorithms/capabilities)
 - Metrics for safe solar flux levels (I_{haz}, V > I_{haz})
 - Performance metrics



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November 2021

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Flux Hazard Analysis

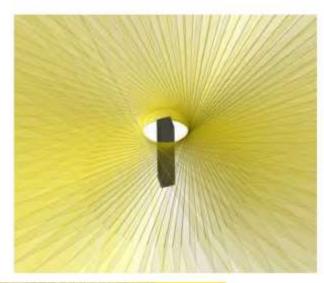
B5-122 cont.

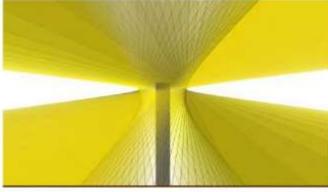
- Apply methodology to Ivanpah and NSTTF fields for analyzing baseline and alternative cases for standby conditions.
 - Generate volumetric flux maps for standby aim-point strategies for representative times and days of the year.
 - For representative flight paths through the volume, perform worse case thermal analysis to determine whether surface (feather) temperature exceeds 160° C along given flight path.
 - Consider number of flight paths exceeding 160°C or the total time of exceedance as metrics to determine the effectiveness of different stand-by aiming strategies.

Flux Hazard Analysis

B5-122 cont.

- Evaluate successful aiming strategies for impact on annual performance
 - Quantify time from standby to operational for representative days of the year and for both baseline and alternative standby aiming strategies.
 - Quantify annual performance impact of alternative vs baseline cases with the goal of achieving zero loss of annual energy delivered.
- Provide both input and output data from methodology for validation of the enhanced Tower Illuminance Model (TIM)





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Wind Energy/Wildlife Interactions: Overview of the Challenges and **Current Efforts to Address Them** Elise DeGeorge, NREL May 11, 2016 NREL is a national laboratory of the U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, operated by the Alliance for Sustainable Energy, LLC

Outline

B5-122 cont.

- Historical overview and statutory authority
- Challenges to wildlife
- Key species habitat distribution
- Research
- Collaboratives
- Conclusions



Red-tailed hawk eating a rabbit.

Photo by Dennis Schroeder, NREL 22325

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Outline

B5-122 cont.

- Historical overview and statutory authority
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Photo by J. Lucas, Purdue University

Wind Installed Capacity over Time



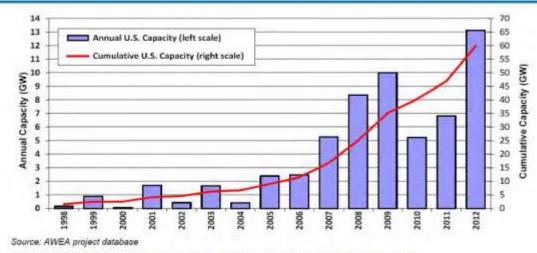


Figure 1. Annual and Cumulative Growth in U.S. Wind Power Capacity

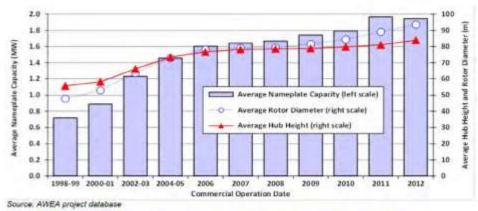
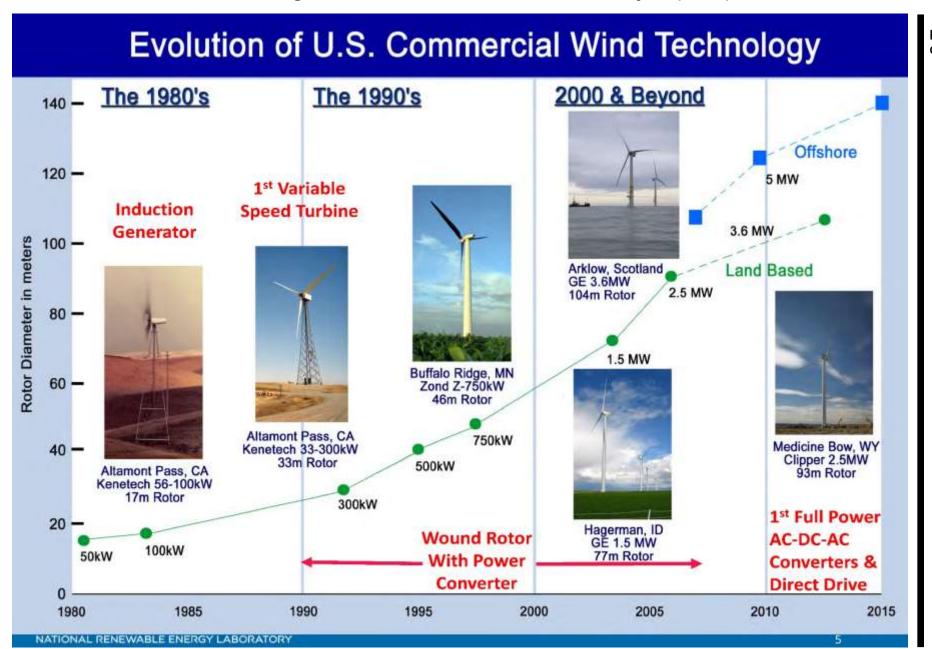


Figure 15. Average Turbine Nameplate Capacity, Rotor Diameter, and Hub Height Installed during Period (only turbines larger than 100 kW)

Source: 2012 Wind Technologies Market Report

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Wind Turbines May Impact Wildlife & Habitats

B5-122 cont.

The discussion of wind turbine impact on wildlife began at the Altamont Wind Resource Area, California, in the late 1980s and early 1990s





Junction Hill Top Wind Farm, Iowa. Five GE 1.6-megawatt (MW) turbines. Photo by Tom Wind, NREL 26494

Altamont Pass Wind Resource Area, California. Kenetech 56-100 kilowatt (kW) turbines. Photo by Shawn Smallwood, NREL 17329

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Real or Perceived Wildlife Impacts can be a Challenge for Development

B5-122 cont.

- Misinformation on potential of impacts is rampant
- Impacts are species- and habitatspecific
- Impacts are site-specific; micrositing is critical to reducing these impacts.

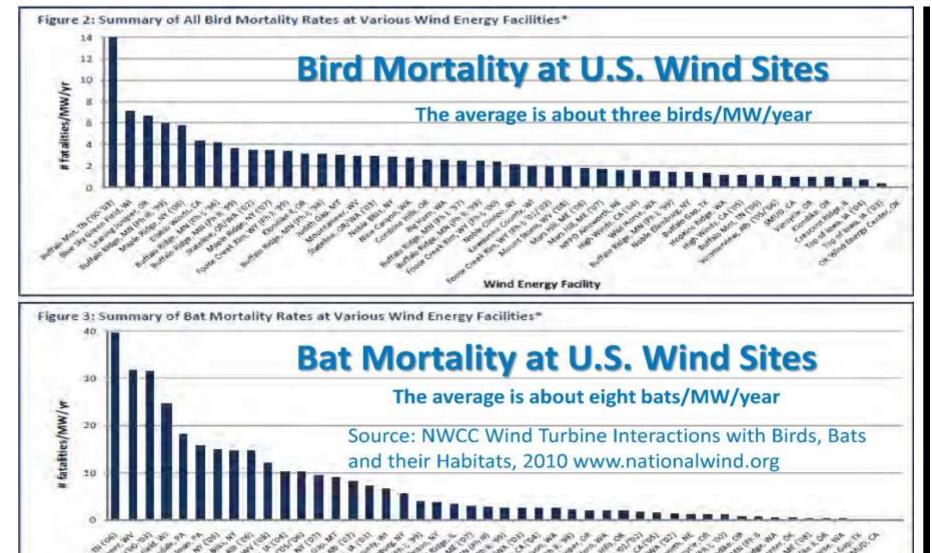


Combination of 221 Mitsubishi Heavy Industries 1-MW turbines and 53 GE 1.5-MW turbines at the Cedar Creek Wind Farm in Grover, Colorado. Photo by Dennis Schroeder, NREL 30593



Eight Nordex N60, 1,300-kW wind turbines in Garrett, Pennsylvania. Photo by Green Mountain Energy Company, NREL 09699

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B5-122 cont.

Wind Energy Facility

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U.S. Fish and Wildlife Service Statutory Authority for Wind Permitting Guidelines

B5-122 cont.

Endangered Species Act:

- Directs the Service to identify and protect threatened and endangered species and their critical habitat
- Must provide a means to protect the species' ecosystems.



- Based on a strict liability statute
- Does not require proof of intent, knowledge, or negligence to be deemed a violation
- Does include actions resulting in the 'taking' or possession of a protected species, in the absence of a USFWS permit or regulatory authorization, is deemed a violation.

Bald and Golden Eagle Protection Act:

 Provides additional legal protection for bald and golden eagles. First enacted in 1940/ golden eagle added in 1962



Whooping Crane. Photo by Karin Sinclair, NREL 27961



Bald Eagle, NREL 01101

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Outline

- Historical overview and statutory authority
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- Conclusions

B5-122

Challenges to Wildlife Related to Wind Energy

B5-122 cont.

Wildlife challenges include:

- Habitat and species that are likely to be impacted vary by
 - Climate
 - Topography
 - Location
- No single solution
- Impacts expected to increase as more turbines are installed across the country—but these can be managed.

Ways of addressing the challenges:

- Identify-near-term research needs
- Use a multipronged approach
- Involve multiple stakeholders
- Garner support for collaborative field research, methods/metrics refinement, tools, mitigation strategies, and deterrent development/testing
- Disseminate information.

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1.

Challenges: Key Issues Being Addressed

Impacts of wind turbines on wildlife include:

- Bats (mortality)
- Raptors (mortality)
- Nocturnal migration (mortality)
- Prairie birds (habitat displacement; genetic diversity)
- Cumulative (population impacts).

Tools to avoid problematic sites:

- Federal (e.g. Wind Energy Guidelines)
- State guidelines
- Pre versus post construction validation
- Mapping of migratory pathways
- Presiting assessments
- Risk assessments
- Literature archive
- Peer review (promote transparency)



Sage Grouse. NREL 20649

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November 2021

1.

B5-122 cont.

Avian Strike Probability Versus Turbine Size

B5-122 cont.

Altamont Scale



15-meter (m) diameter RSA and 100 kW

Next-Generation Scale



93-m diameter RSA and 2.5 MW

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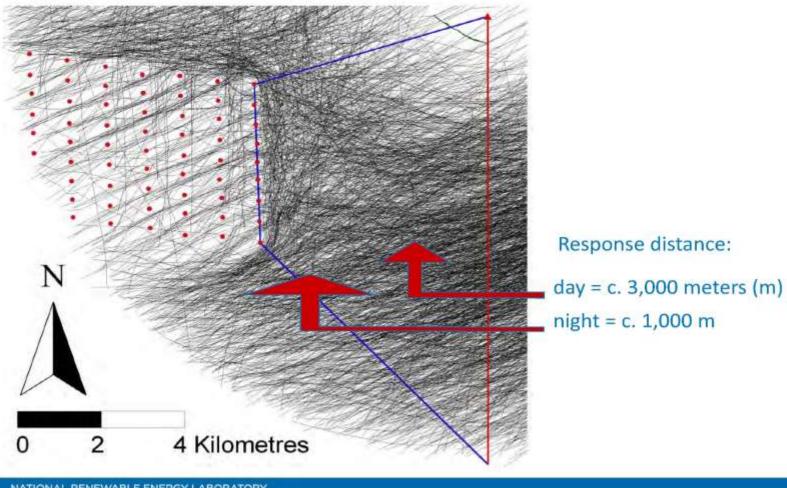
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D-285 Final EIR

Avoidance Behavior can be Significant

B5-122 cont.

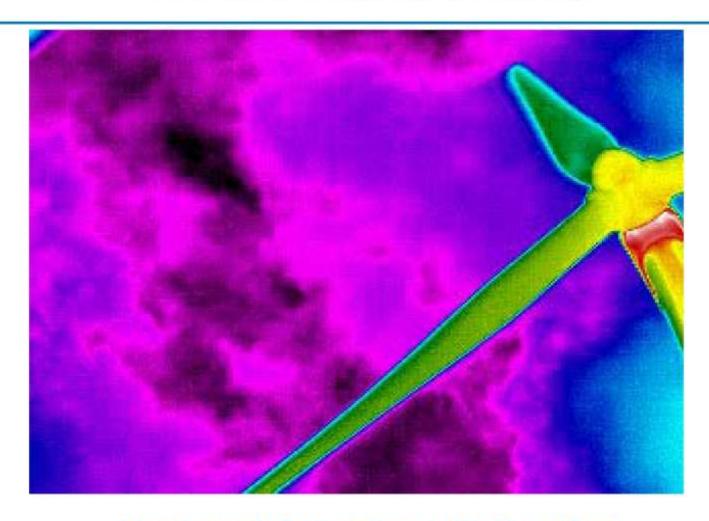
Radar tracks of migrating birds through the Nysted Offshore Windfarm for operation in 2003



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Bats Interactions: Curiosity?

B5-122 cont.



Infrared Image of a Bat Flying Through a Wind Turbine Rotor

Video by Jason Horn, Boston University

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Outline

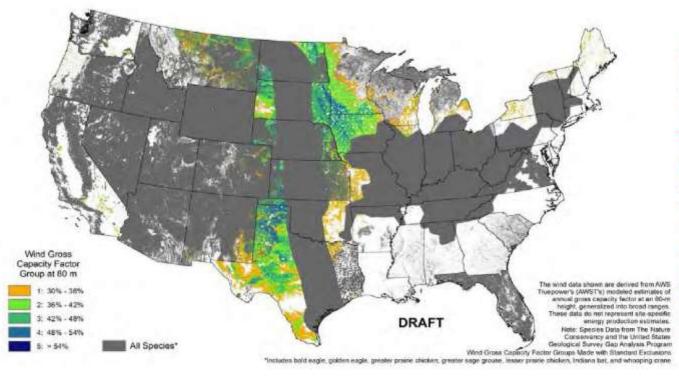
B5-122 cont.

- Historical overview and statutory authority
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Key Species Habitat Distribution: Seven Species

B5-122 cont.



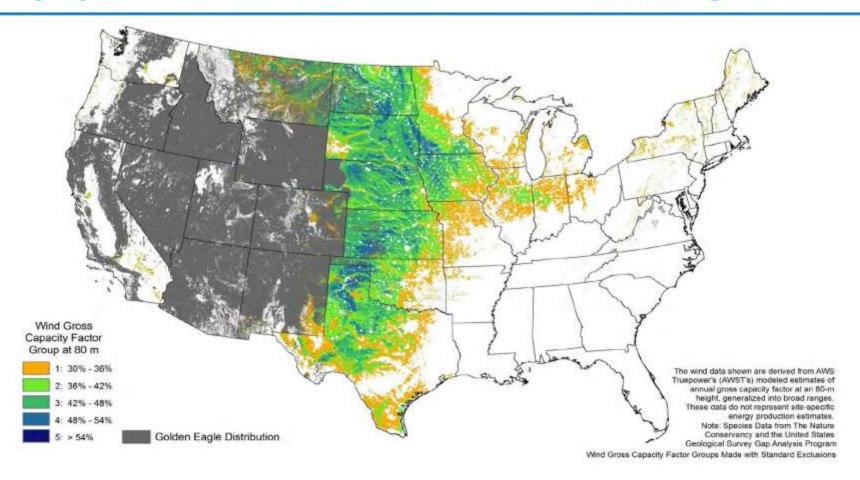
Areas in grey indicate where wildlife species live, breed, and migrate. These areas are not no-build zones, but are of special concern for developers that could increase costs and time, or lead to project delays or cancellation.

Wildlife distribution can impact local areas very differently. On a national scale, 44%-53% of land could be affected.

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Key Species Habitat Distribution: Golden Eagles





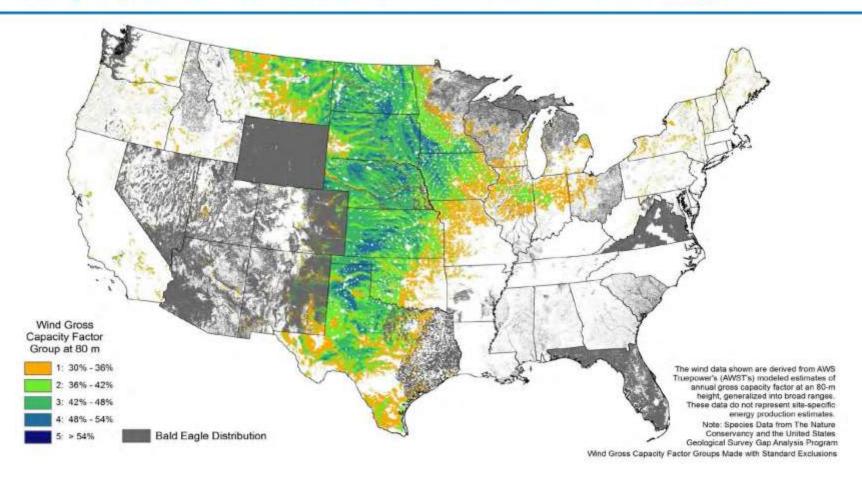
Golden eagle habitat: areas requiring additional consideration

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November 2021

Key Species Habitat Distribution: Bald Eagles



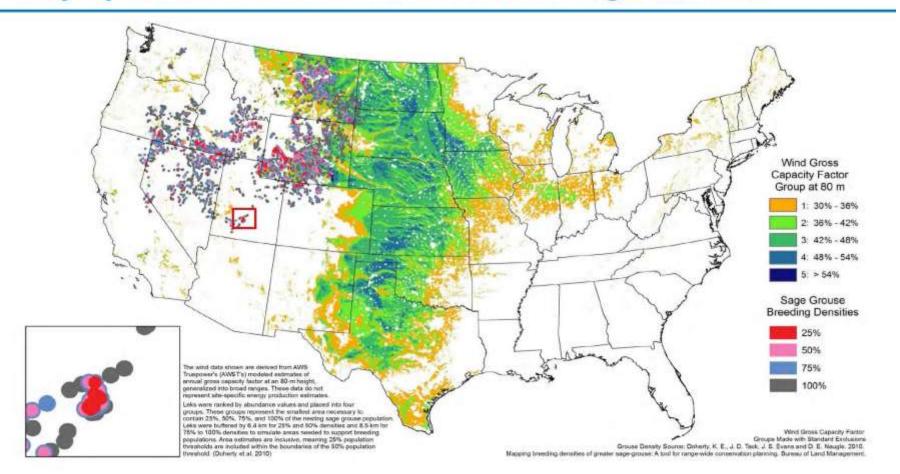


Bald eagle habitat: areas requiring additional consideration

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Key Species Habitat Distribution: Sage Grouse



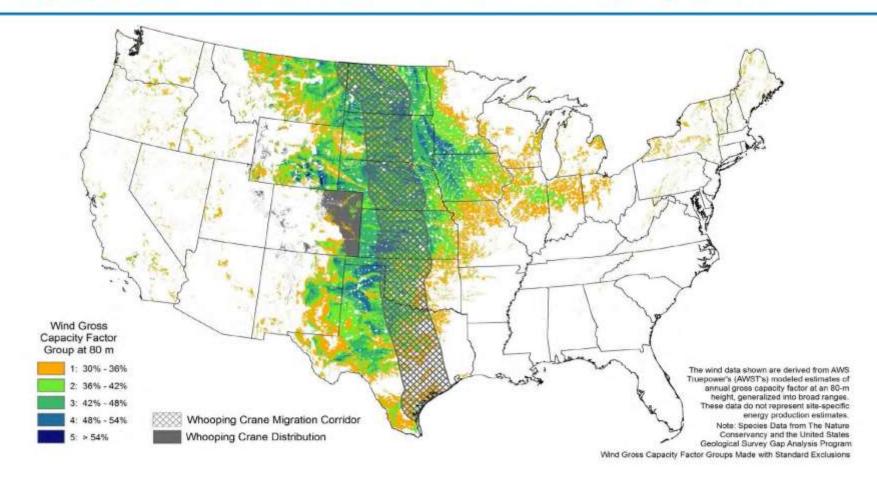


Sage grouse habitat and breeding sites: areas requiring additional consideration

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Key Species Habitat Distribution: Whooping Crane



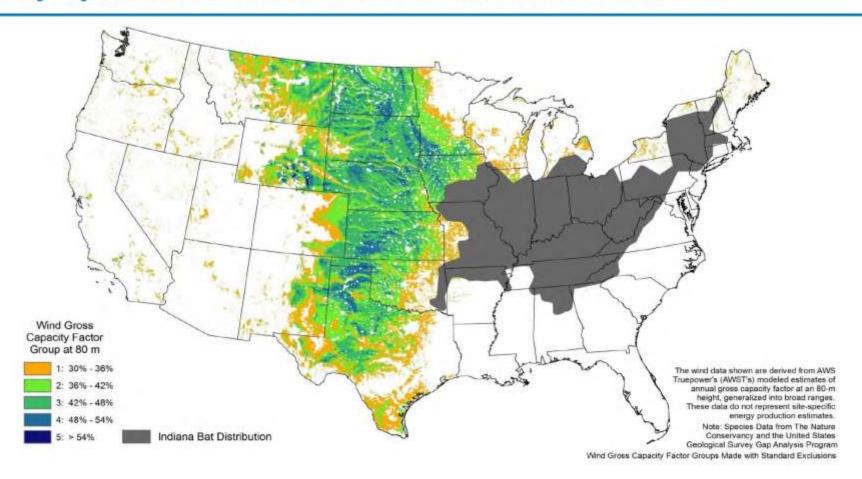


Whooping crane habitat and migratory corridor: areas requiring additional consideration

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Key Species Habitat Distribution: Indiana Bat



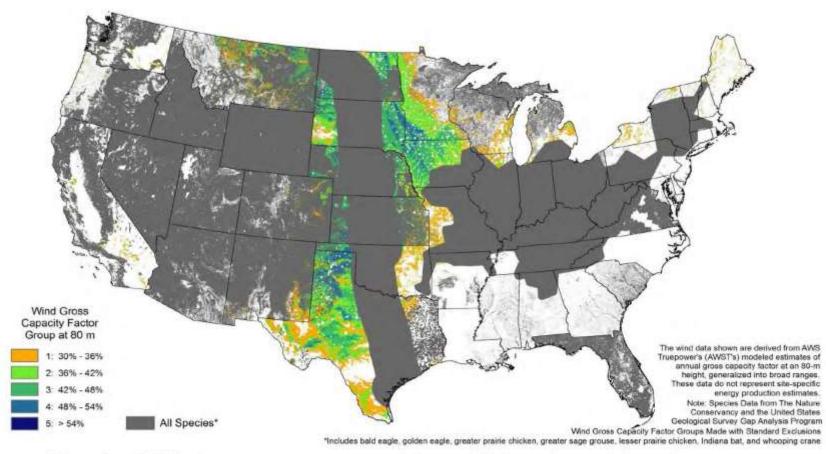


Indiana bat habitat distribution: areas requiring additional consideration

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Key Species Habitat Distribution: Combined

B5-122 cont.



Combined wildlife impacts: areas requiring additional consideration

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Outline

B5-122 cont.

- Historical overview and statutory authority
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D-296

Mitigation Research

Mitigation research focuses on:

- Deterrent development
- Correlating wind speed to utilization
- Correlating weather patterns to fatality patterns
- Offsite compensation
- Micrositing
- Turbine size
- Blade visibility
- Seasonal shutdowns
- Habitat manipulation
- Artificial roosts.



Greater Prairie Chicken. Photo by Mark Herse, Kansas State University, NREL 27970

B5-122

cont.

Technology/Model Research

B5-122 cont.

Technology/modeling research is focused on:

- Radar validation
- Thermal imaging cameras
- Near-infrared cameras
- Stable isotopes
- Predictive models.



Infrared camera. Photo by Dennis Schroeder, NREL 20338

D-298

Testing Detection Systems at the NWTC

B5-122 cont.



Houdini in flight during FY15. GPS data logger can be seen on his right foot and UHF tracker can be seen on his left.



Testing of detection systems using Auburn University's golden and bald eagles

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Importance of Convening Interdisciplinary Panel of Experts for Prioritizing Research

B5-122 cont.

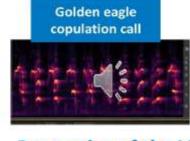


- Bringing people of different focus areas/expertise to the table to understand and prioritize solutions
- Outcome as it relates to wind energy and eagle impacts: need to understand fundamental behavior and physiology of species of concern

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Recommendations from Physiology and Behavior Specialists

- Understand: population and habitat associations, threats, annual cycle, demography, flight behavior, diet, etc..
- Risk is when turbines intersect with a species basic needs (e.g. with eagles it is food, updraft and nesting sites)



For auditory deterrent research, one expert recommends the following:

- Measure the auditory system of these birds
- Use this information to build a library of sounds that might be stressful (annoying)
- Use heart monitors to give us an index of stress (estimated by an increase in heart rate)
- Give a variety of different sounds to estimate stress induced by the sounds

Test birds over different time intervals (hours to weeks) to estimate the rate of adaptation to these sounds

Properties of the Vocal System Provide Clues about Properties of the Auditory System

Source: As presented by Jeff Lucas, Purdue University at Eagle Detection and Deterrent Technology Research Gaps and Solutions Workshop, December 2015



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Photo provided by T. Katzner

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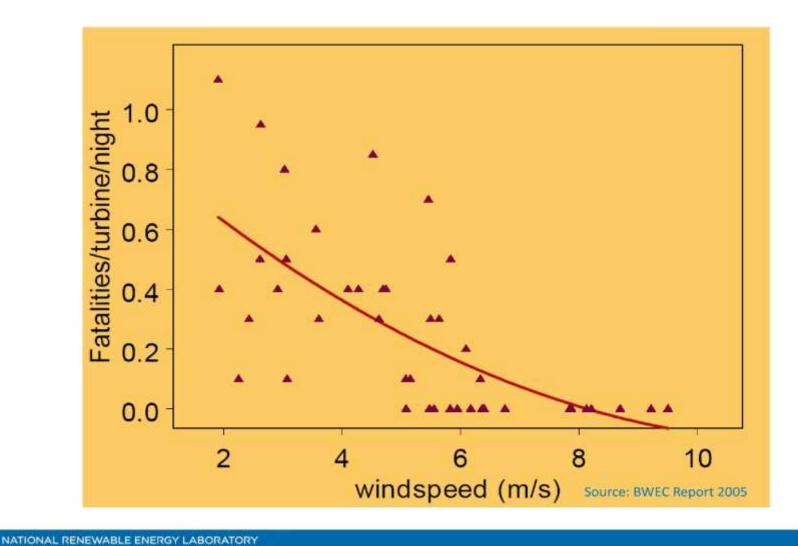
November 2021 D-301 Final EIR

B5-122 cont.

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BWEC Study Results

B5-122 cont.



B5-122 cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Research Conducted from Settlement Agreements

Duke Energy at Top of the World Windfarm in Casper, Wyoming

- Onsite wildlife specialists during daylight hours
- Working with FWS on an eagle trapping and tracking project
- GPS help to understand eagle migration movements
- Advancing IdentiFlight camera system
- Opportunities for R&D when faced with unsupported requirements



An aerial view of Duke's Top of the World wind farm, located in Casper, Wyo.

Source: http://nawindpower.com/online/issues/NAW1604/FEAT_01_Duke-s-Avian-Mitigation-Techniques-Take-Flight-What-s-Working-And-Why.html

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Outline

B5-122 cont.

- Historical overview and statutory authority
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- Conclusions

-

Collaboratives are Often Beneficial for Advancing the Knowledge Base

B5-122 cont.

Benefits of collaboratives include:

- Access to third party, unbiased research
- Accepted experts within collaborative
- Agreement on study design
- The ability to develop relationships (trust)
- A safe forum for discussion
- The ability to engage early and often
- Transparency/credibility
- Leveraging of funds
- Project access
- Access to interim results
- Accepted results
- A model for future interactions.



705-MW project in Tehachapi Pass Wind Resource Area, California.

Photo by David Hicks, NREL 18455

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B5-122 cont.

Current collaboratives

Current collaboratives include:

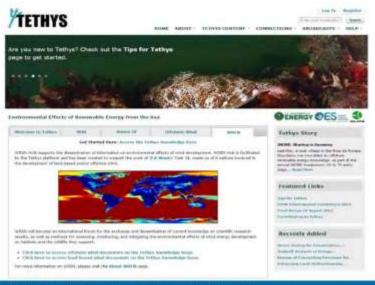
- The National Wind Coordinating Collaborative (NWCC).
 Includes federal, state, utilities, nongovernmental organizations (NGOs), and wind industry
 - Grassland Shrub Steppe Species Collaborative. Includes federal, state,
 NGOs, and wind industry
 - Sage Grouse Collaborative. Includes federal, state, NGOs, and wind industry
- Bats and Wind Energy Cooperative (BWEC). Includes federal, state, NGOs, and wind industry
- American Wind Wildlife Institute (AWWI). Includes industry and NGOs
- International Energy Agency Wind Task 34. Includes nine member countries.

More on International Energy Agency Wind Task 34

 Working Together to Resolve Environmental Effects of Wind Energy, known as WREN

- October 2012–2016; extension under discussion
- Current member countries: Ireland,
 Netherlands, Norway, Spain, Switzerland,
 United Kingdom, United States, France, and
 Sweden.





WREN Hub/Tethys (http://tethys.pnnl.gov/)

- White papers: Adaptive management, individual impacts to population effects, green versus green, cumulative impacts, transboundary issues
- Webinars: on land/offshore, birds/bats/marine mammals, tools http://tethys.pnnl.gov/environmental-webinars?content=wind

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B5-122 cont.

Outline

B5-122 cont.

- Historical overview and statutory authority
- Challenges to wildlife
- Key species habitat distribution
- Research
- Collaboratives
- Conclusions

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Conclusions

B5-122 cont.

- Wind-wildlife impact concerns are complicated
- Micrositing is key to avoiding, minimizing, and mitigating impacts; some locations may just not be appropriate for wind development
- Research and development of tools is ongoing and benefits from interdisciplinary approaches
- Collaboratives provide opportunities to leverage resources to find solutions for common challenges.

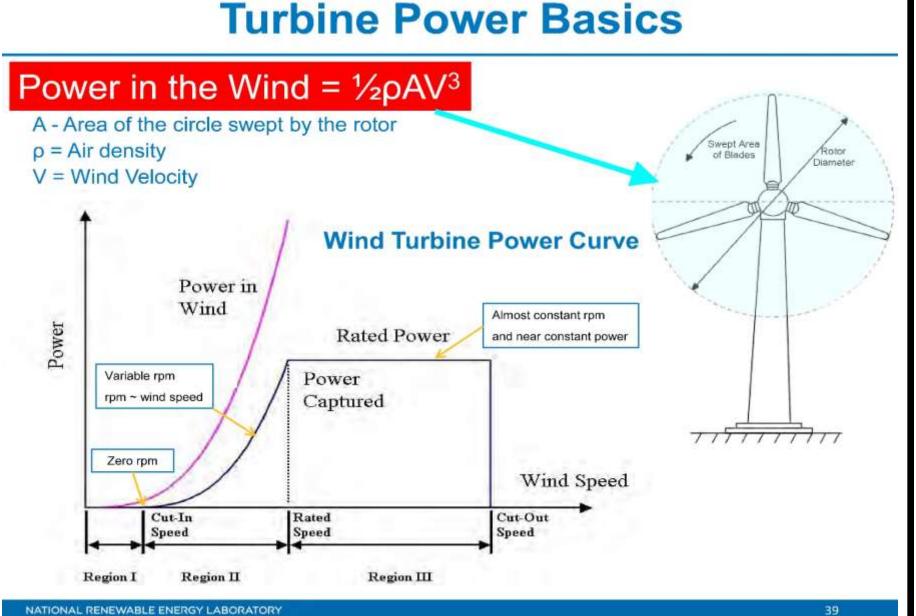


Grand Ridge Wind Energy Center. GE 1.5-MW turbines in Lasalle County, Illinois. Photo by Invenergy, LLC, NREL 16040.

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B5-122 cont.



NWCC

B5-122 cont.

Formed in 1994, founding members included NREL and DOE, the American Wind Energy Association, National Audubon Society, Electric Power Research Institute, and Union of Concerned Scientists.

Membership currently exceeds 1,500 people.

Major features of the NWCC include:

- Multistakeholder
- Facilitated; ground rules for engagement
- Coordinated field research
- Information dissemination (e.g., website; coordination of report preparation and publication; presentations at meetings)
- Biennial Research Meeting (X in December 2014)

Recent research activities were initiated under the Grassland Shrub Steppe Species Collaborative, and include:

- Grassland Community Collaborative (Prairie-Chicken research)
- Sage Grouse Collaborative (Sage Grouse research)

http://www.nationalwind.org/

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BWEC

Formed in 2004, founding members included the American Wind Energy Association, Bat Conservation International, USFWS, and NREL, with DOE and the U.S. Geological Survey later. Major features of the BWEC include:

- Objective, science-based
- International expertise tapped
- Organizational structure includes an oversight committee, technical committee, and science committee
- Coordination of field research (e.g., operational curtailment, acoustic deterrent, other)
- Information dissemination (e.g., website; coordination of report preparation and publication; presentations at meetings)
- Frequent science meeting.

http://www.batsandwind.org/





Source: Arnett, et al. 2008. Effectiveness of Changing Wind Turbine Cut-in Speed to Reduce Bat Fatalities at Wind Facilities

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B5-122 cont.

AWWI

Formed in 2008, board members consist of 50 industry and 50% NGOs.

Primary activities include:

- Research
- Data repository

Wind-Wildlife Research Information System

Landscape tools

Landscape Assessment Tool

Mitigation strategies for eagle take

Through the use of expert elicitation, AWWI has facilitated the development of two models to predict numerical effects of compensatory mitigation on golden eagle survival and reproduction through: lead abatement and vehicle collision reduction strategies.

Education



Golden Eagle with a transmitter on its back. Photo by Randy Flament, NREL 23585

4

Candidate Avian Risk Metrics

Hypothesis: "Mortality risk increases with flight time in the rotor zone (yellow zone), if the turbine is operating"

A Candidate Preconstruction Relative Risk Metric:

Species Relative Risk = (Flight Hours in Rotor Zone with Wind in Operating Range)/(Plant Swept Area x Hours with Wind in Operating Range)

A Candidate Postconstruction Fatality Metric:

Species Risk = Fatalities/(Swept Area x Turbine Operation Hours)

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The USFWS Land-based Wind Energy Guidelines





Released March 2012

Provide a Tiered Approach, including:

- Tier 1 Preliminary site evaluation (landscape-scale screening of possible project sites)
- Tier 2 Site characterization (broad characterization of one or more potential project sites)
- Tier 3 Field studies to document site wildlife and habitat and predict project impacts
- Tier 4 Postconstruction studies to estimate impacts
- Tier 5 Other postconstruction studies and research.

USFWS Guidelines: Developer and Service Roles

B5-122 cont.

TIER	Project Developer/Operator Role	Provide lists of data sources and references, if requested Provide species lists, for species of concern, including species of habitat fragmentation concern, for general area, if available Provide information regarding plant communities of concern, if available Respond to information provided about findings of biologist from site visit Identify initial concerns about site(s) based on available information Inform lead federal agencies of communications with wind project developers		
Tier 1: Preliminary site evaluation	Landscape lovel assessment of habitat for species of concern Request data sources for existing information and literature			
Tier 2: Site characterization	Assess potential presence of species of concern, including species of habitat fragmentation concern, likely to be on site Assess potential presence of plant communities present on site that may provide habitat for species of concern Assess potential presence of critical congregation areas for species of concern One or more reconnaissance level site visit by biologist Communicate results of site visits and other assessments with the Service Provide general information about the size and location of the project to the Service			
Tier 3: Field studies and impact prediction	Discuss extent and design of field studies to conduct with the Service Conduct biological studies Communicate results of all studies to Service field office in a timely manner Evaluate risk to species of concern from project construction and operation Identify ways to mitigate potential direct and indirect impacts of building and operating the project	 Respond to requests to discuss field studies Advise project proponent about studies to conduct and methods for conducting them Communicate with project proponent(s) about results of field studies and risk assessments Communicate with project proponents(s) ways to mitigate potential impacts of building and operating the project Inform lead federal agencies of communications with wind project developers 		
Tier 4: Post construction studies to estimate impacts	Discuss extent and design of post-construction studies to conduct with the Service Conduct post-construction studies to assess fatalities and habitat-related impacts Communicate results of all studies to Service field office in a timely manner If necessary, discuss potential mitigation strategies with Service Maintain appropriate records of data collected from studies	 Advise project operator on study design, including duration of studies to collect adequate information Communicate with project operator about results of studies Advise project operator of potential mitigation strategies, when appropriate 		

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Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

USFWS Eagle Conservation Plan Guidance (April 2013)

- To facilitate issuance of programmatic eagle take permits for wind energy facilities the USFWS finalized the Eagle Conservation Plan Guidance- Module 1- Land-based Wind Energy Version 2
- This Guidance provides a framework for developing and evaluating Advanced Conservation Practices, which is the framework for detect and deter technologies



Photo by T. Katzner

Power and Size of Turbines Over Time

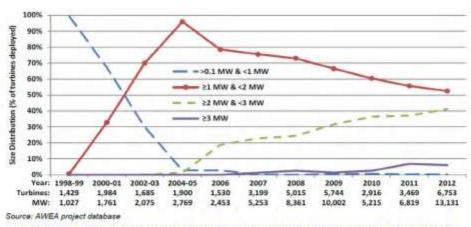
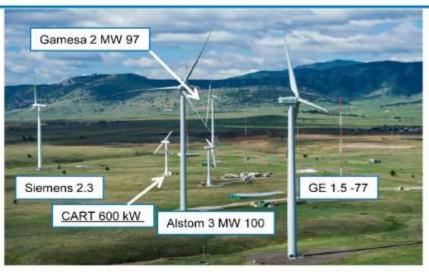


Figure 16. Size Distribution of Number of Turbines (>100 kW) Deployed in Each Period

Source: 2012 Wind Technologies Market Report

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Representative Wind Turbine Specifications







Danish National Wind Test Center - Photo by R. Thresher

Turbine	Power - MW	Rotor Size - m	Rotor Area – m²	Rotor Speed - rpm	Tower Height - m	Cut-in Wind Speed m/s
GE 1.5 se	1.5	70.5	3904	12-22.4	54.7 – 64.7	4
GE 1.5 sl	1.5	77	4657	11-20.4	61.4 - 100	3.5
GE 1.5 sle	1.5	77	4657	11-20.4	61.4 - 100	3.5
GE 1.5 xle	1.5	82.5	5346	10.1-18.7	58.7 - 100	3.5
GE 1.6 or 1.7	1.6 – 1.7	100	7854	?	80 -96	?
GE 2.5 -100	2.5	103	8333	?	75-100	3
GE 3.2 -103	3.2	103	8333	?	70-98	?
Siemens SWT 2.3	2.3	100	7854	6-16	80 or Site specific	3-4
Siemens Offshore SWT – 6.0 – 154	6	154	18,600	5-11	Site Specific	3-5

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D-320 Final EIR

U.S. Department of Energy Wind Program's Mission

B5-122 cont.

- Reduce challenges to project development to accelerate deployment of appropriate wind energy
- Support achievement of 20% wind energy by 2030
- Accelerate wind energy capacity growth/ development of domestic energy options (Energy Policy Act of 2005).

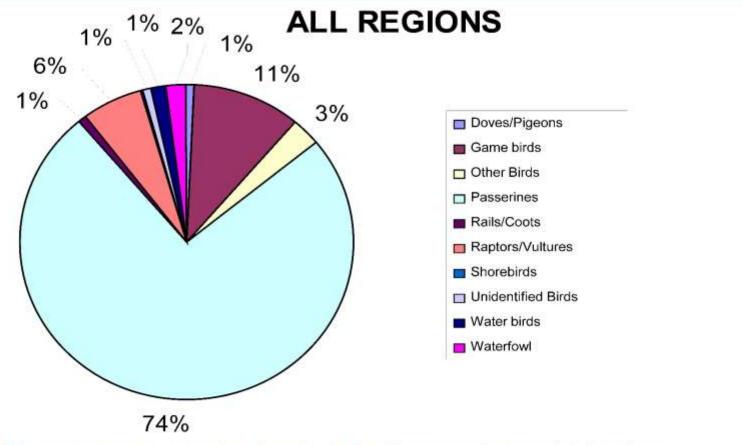


Northwind 100, 100-kW wind turbine; Hempstead, New York. Photo by Town of Hempstead, NREL 28963

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Research: Species Composition of Bird Fatalities

B5-122 cont.



Proportion of fatalities at sites reporting fatalities by species, for all regions where studies have been conducted (the Pacific Northwest, Midwest, Rocky Mountains, and East).

Source: Strickland and Morrison, February 26, 2008.

http://www.fws.gov/habitatconservation/windpower/Past_Meeting_Presentations/Morrison_Strickland.pdf

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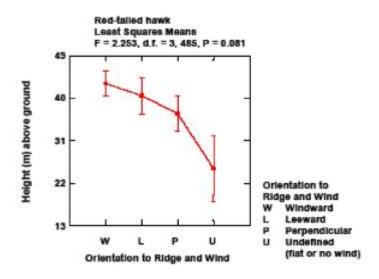
Red-Tailed Hawk Flight Observations in Altamont Pass

B5-122 cont.

Height Histogram

Distribution of flight heights above ground level amount red-tailed hawks observed during behavioral observation sessions during 2003 and 2004 in the Altamont Pass Wind Resource Area.

Height versus Orientation



Mean flight heights of red-tailed hawk over aspect of ridge relative to oncoming winds.

> Source: K. Smallwood and L. Neher, CEC-500-2005-005, December 2004

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B5-122

cont.

Comment Set B5 – Basin & Range Watch and Western Watersheds Project (cont.)

Highlights of One Interaction Study in Altamont Pass

Raptor Fatalities and Sightings

	<u>Fatalities</u>	Sightings	Rel. Risk F/S
Burrowing Owl	38	56	0.68
American Kestrel	22	429	0.05
Red-Tailed Hawk	100	1,780	0.06
Golden Eagle	10	401	0.02
Northern Harrier	2	114	0.02
Prairie Falcon	1	63	0.02
Turkey Vulture	0	756	0
Common Raven	0	792	0

From: Bird Risk Behaviors and Fatalities at the Altamont Pass WRA, Carl G. Thelander, et al

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Sage Grouse Research

B5-122 cont.

These are preliminary results and are not for distribution or citation.

Annual Report

A STUDY OF THE IMPACTS OF A WIND ENERGY DEVELOPMENT ON FEMALE GREATER SAGE-GROUSE IN SOUTHEASTERN WYOMING

January 27, 2014

Presented to:

National Wind Coordinating Collaborative Sage-Grouse Research Collaborative Oversight Committee

Internal Document - Not for Distribution

Ecology of Male Greater Sage-Grouse in Relation to Wind Energy in Wyoming

Research Team: Power Company of Wyoming and University of Missouri



Sage Grouse. NREL 20649

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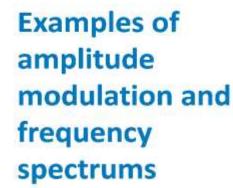
Properties of the Vocal System Provide Clues about Properties of the Auditory System

B5-122 cont.

White-breasted nuthatch













Golden eagle skonk call









Source: As presented by Jeff Lucas, Purdue University at Eagle Detection and Deterrent Technology Research Gaps and Solutions Workshop, December 2015

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B5-122 cont.

Breakout Session 1 (Day 1)

Stakeholder Concerns, Additional Relevant Data Sources, and Additional Research underway

B5-122 cont.

Breakout Group 1

Other things CWG should undertake?

- Greater stakeholder involvement
 - CWG & ASWG
 - FACA?
 - Use industry as a resource
 - Review of the Science Plan
- Outline next steps beyond the Science Plan
 - Implementation

New Information

- New solar project in Pahrump, NV
 - Panel spacing may diffuse the lake effect
- Widen the scope beyond AZ, CA, and NV
- USGS-FWS OFR on standardized monitoring

B5-122 cont.

Group 2 (Day 2)

B5-122 cont.

What other tasks should the CWG Undertake (1 of 2)

- Focusing on the science is the correct approach. Monitoring should be informed by research. Don't monitor for sake of monitoring. Interrelationship between monitoring and research.
- Consider costs when determining monitoring requirements (Danielle, Jeremiah)
- Monitoring should be designed to answer specific questions.
- Monitoring Guidelines due out in June. Will be publically available. Different from the CWG Science Plan.
- Monitoring procedures are a research question.
- Determine level of overall mortality
- Look at causation.
- Get data to focus the research
- Science plan should have priorities as a product
- What is the low hanging fruit?
- Leverage information and existing data

B5-122 cont.

What other tasks should the CWG Undertake (1 of 2)

- Site specific monitoring vs understanding where projects should go
- What are we siting for? Any specific species? (Songbirds, migratory birds, etc.) E.g. wind now focuses on bats and raptors.
- Good model is San Juaquin Valley Least Conflict Plan (goes beyond science)
- What features in the landscape influence avian presence and behavior
- Keep in mind Technology specific effects
- Keep visibility on ongoing research efforts, common database? AWWI web site has extensive list of studies. When should studies be released?
- General research studies vs project data. CEC posts project data after review.
- Lots of folks want data/information, but many studies are still underway
- CWG and ASWG access to raw data? What questions can be answered?

B5-122 cont.

Any ongoing or planned research or data collection efforts that are relevant to developing the science plan

- ASWG Research Panel looking at rough methodologies to answer ASWG questions
- ASWG Research Panel asked to sequence the research

B5-122 cont.

Breakout Group 3

Stakeholder Concerns, Additional Relevant Data Sources, and Additional Research underway

B5-122 cont.

Group 3

- Dan Boff, DOE
- Kirk LaGory
- Amy Fesnock,
- Bill Werner
- Katie Umekubo
- Chuck Griffin
- Juliette Falkner
- Karyn Coppinger
- Brian Boroski, H.T. Harvey
- Matt Hutchinson

Other things CWG should undertake?

- Need to specify focus on causation of mortality
- Look at sublethal effects (e.g., decreased reproduction, carrying capacity, etc.)
- Scope should go beyond regulatory requirements

Data and models

- Use of existing monitoring data: What does it tell us? What would we do differently?
- Making data available to the public. Data quality issues.
- Need to develop a toolkit

Relevant studies

- Genetic studies to examine population of origin
- Golden eagle research related to populations
- Look at rare and common species to provide bookends
- Condor Issue (vol 118): several papers population concerns related to renewable energy issues
- Draft article submitted to JWM, modeling estimates related to searcher efficiencies for rare species
- Draft paper looking at direct and indirect effects for solar, wind, and transmission



Conceptual Understanding of Avian-Solar Interactions

Lee Walston
Argonne National Laboratory

May 10-11, 2016 Sacramento, California











B5-122

Why Develop a Conceptual Model?

- Illustrate important processes
 - Direct & indirect effects
 - Interactions and cumulative effects
- Synthesize current understanding of avian-solar interactions
 - Foster a common understanding
- Identify information gaps and research priorities
- Starting point for the avian-solar science plan

Multiagency CWG Stakeholder Workshop, May 2016

- 2

Avian-Solar Conceptual Model

Simple vs. Complex

Solar Energy Development

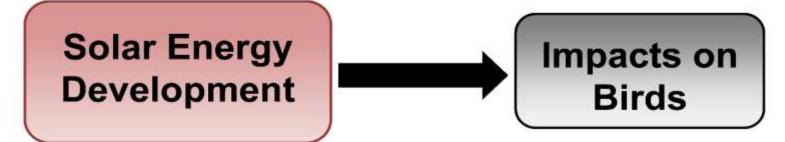
Impacts on Birds

Two main focal points

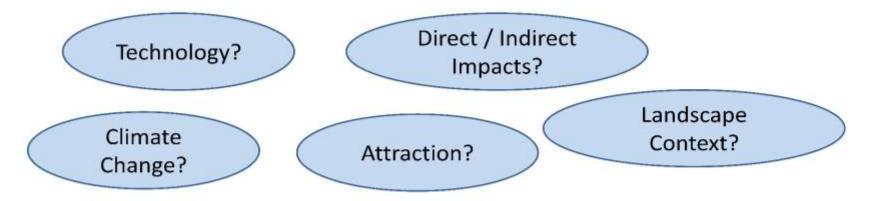
Multiagency CWG Stakeholder Workshop, May 2016

Avian-Solar Conceptual Model

Simple vs. Complex



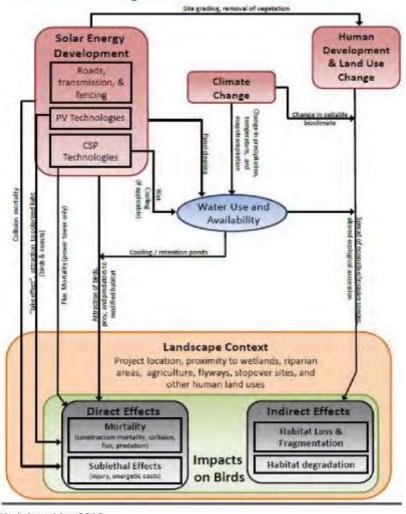
Impacting factors, pathways, and interactions



Multiagency CWG Stakeholder Workshop, May 2016

Avian-Solar Conceptual Model

DRAFT



Multiagency CWG Stakeholder Workshop, May 2016

.5

Avian-Solar Conceptual Model

Climate Change

Human
Development
& Land Use
Change

Indirect Effects

- Habitat loss & fragmentation
- Habitat degradation

Solar Energy Development

> Roads, transmission, & fencing

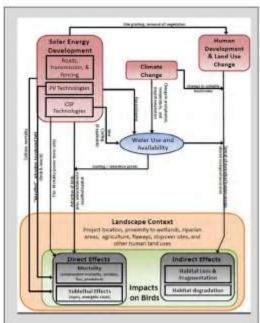
PV Technologies

CSP Technologies Change in suitable climate

Habitat loss

Spread of nonnative / invasive species

Altered ecological succession



Multiagency CWG Stakeholder Workshop, May 2016

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Avian-Solar Conceptual Model

Climate Change

Human
Development
& Land Use
Change

Direct Effects

- Mortality
- Sublethal Effects

Solar Energy Development

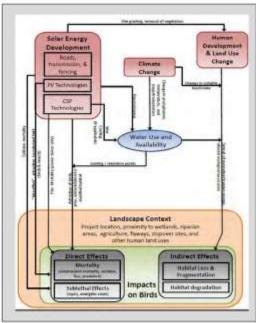
> Roads, transmission, & fencing

PV Technologies

CSP Technologies Construction mortality, collision, flux, predation

Attraction of birds, prey, and predators

Technological considerations & project design (e.g., water)



Multiagency CWG Stakeholder Workshop, May 2016

7

Avian-Solar Conceptual Model

Location matters

Landscape Context

Project location, proximity to wetlands, riparian areas, agriculture, flyways, stopover sites, and other human land uses

Direct Effects

Mortality

(construction mortality, collision, flux, predation)

Sublethal Effects

(injury, energetic costs)

Impacts on Birds

Habitat Loss & Fragmentation

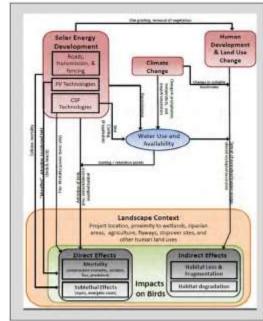
Indirect Effects

Habitat degradation

Multiagency CWG Stakeholder Workshop, May 2016

Avian-Solar Conceptual Model

- Focus on processes and interactions the CWG may be most concerned about
- Supporting text to be provided in the science plan
- The diagram illustrates potential impacts that could occur
 - Projects sited on previously disturbed lands may have less impact
 - Projects with minimal water requirements (and no ponds) may have less impact

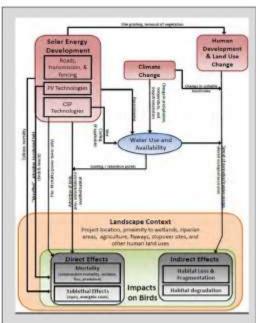


Multiagency CWG Stakeholder Workshop, May 2016

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Avian-Solar Conceptual Model

- To inform selection and prioritization of the CWG management questions
 - Are any processes more important for agency decision making?
 - What are the information gaps?
 - Which information gaps should be addressed first?
- Future versions of the model may illustrate important information gaps and CWG priorities
 - Color / thickness of the arrows
 - Additional annotation



Multiagency CWG Stakeholder Workshop, May 2016

B5-122 cont.

Questions?

Multiagency CWG Stakeholder Workshop, May 2016

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B5-122 cont.

Outline

B5-122 cont.

- Avian-Solar Interaction Model
- "Management Question" Defined
- Sample Questions
- Management Question Categories
- Generalized Management Questions

D-352

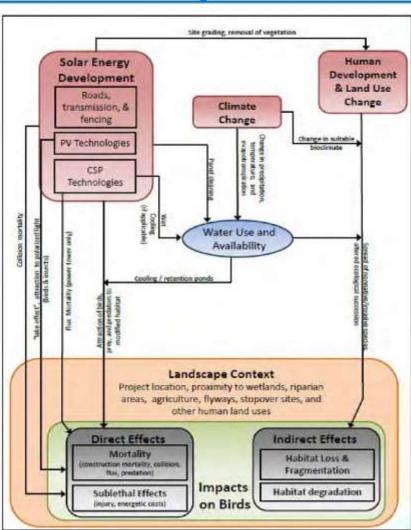
- Research Prioritization
- Discussion



Red-tailed hawk eating a rabbit.

Photo by Dennis Schroeder, NREL 22325

Avian Solar Conceptual Framework



B5-122 cont.

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Management Questions Background

B5-122 cont.

- Define what information the agencies need
- Define research needs
- Tied to the conceptual model
- Due to differing missions, different agencies may have different questions
- Received 108 questions
- Questions grouped into seven (7) categories
- Questions consolidated into 14 "generalized questions"

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Sampling of Management Questions

- What are the most scientifically rigorous and cost-effective population monitoring tools available for: 1) quickly identifying potential impacts to populations, and 2) determining effectiveness of mitigation strategies at local and regional scales?
- Is higher mortality realized during any particular time of year?
- Are birds being attracted to the site to forage on insects killed by the concentrated solar flux?

B5-122 cont.

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B5-122 cont.

Management Questions Categories

- 1. Landscape Considerations
- 2. Methods to Evaluate Avian Risk and Impacts
- 3. Sources of Mortality and Injury
- 4. Avian Behavior (Attraction/Avoidance)
- Impacts to Habitat and Other Wildlife That Might Affect Birds
- 6. Taxonomic and Guild-Specific Impacts
- 7. Minimization, Mitigation, and Adaptive Management

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Generalized Management Questions

1. Landscape	What are the larger-scale avian movement patterns in the region (including
Considerations	seasonal movements and factors that influence avian movements such as the presence of stopover sites in the landscape)?
	What are the landscape-level cumulative impacts on regional bird populations or on bird populations migrating through landscapes targeted for solar development?
	What is the anticipated solar energy build-out for the foreseeable future? (e.g., project size, location, technology type)
2. Methods to Evaluate Avian Risk and Impacts	What are the best methods for monitoring and evaluating avian mortality, specific to each type of solar energy technology?
	What are the best methods for identifying the bird species that would be most vulnerable during all phases of solar development (pre-construction, construction, and post-construction)?
3. Sources of Mortality and Injury	What are the sources of avian mortality and injury at solar facilities (i.e., project features), and what factors (e.g., location, habitat characteristics, time of year, species) affect frequency of those mortalities and injuries?

B5-122 cont.

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Final EIR

Generalized Management Questions

4. Avian Behavior (Attraction / Avoidance)	How do solar facilities affect landscape level movements of birds (i.e., migration and dispersal movements), and what factors (e.g., location, habitat characteristics, time of year, species) affect these movements?
	How do solar facilities affect local-scale movements/behaviors of birds (i.e., foraging and breeding behaviors), and what factors affect these behaviors?
5. Impacts to Habitat and Other Wildlife That Might Affect Birds	What are the impacts of solar development to other wildlife (such as predators or prey) and habitat that might affect birds?

B5-122 cont.

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8

Generalized Management Questions

6. Taxonomic and Guild-Specific	How do solar developments affect different bird taxa or guilds?
Impacts	What are the population effects from solar developments to individual bird species, particularly those of conservation concern?
	Which population or species-specific impacts are of greatest conservation concern?
7. Minimization, Mitigation, and Adaptive Management	What are the most effective minimization and mitigation methods to reduce or eliminate avian mortality? (e.g., project siting, technology engineering and project design to reduce attractiveness of facilities to birds, construction timing, operational parameters, deterrents, or offset)
	What off-site mitigation is most effective for off-setting mortalities for affected populations/species?

B5-122 cont.

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B5-122 cont.

Research Prioritization

Based upon initial input from CWG members

- Management: Questions that are important for informing management decisions (management questions vs. research questions)
- Timeliness: Questions that can be answered in 3-5 years
- Overlap: Questions shared by multiple agencies

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1



B5-122 cont.

B5-122 cont.

Day 2 Breakout Group Discussions

B5-122 cont.

Group #1

B5-122 cont.

Conceptual Framework

- Add stranding as another form of mortality
- Add dust suppression as water use

B5-122 cont.

Management Questions (General)

- Research questions cannot be fully addressed through monitoring; require research/study design
- Not all questions can be answered with existing data
- Focus on natural history of taxa most likely to interact with solar facilities (e.g., insectivores).

#1 Landscape Considerations

- Scope concerns with the amount of foreseeable development question.
- Meta-analysis of existing data could address landscape considerations
 - ebird
 - Breeding bird survey

B5-122 cont.

#2 Monitoring Methods

- Consider changes to pre-construction baseline surveys for taxa most likely to be affected ("better" baseline monitoring data)
 - Different seasons
 - Species-specific protocols
 - What taxa are most likely to interact with solar facilities?

#3 Source of Mortality and Injury

 It is possible ("maybe") for existing data and monitoring protocols to help inform sources of mortality and causation.

B5-122 cont.

#4 Behavior

- Existing data/studies that could be used to understand avian behavior:
 - Pre-construction radar study for at least one solar project
 - Raptor telemetry data

#5 Impacts to habitat and other wildlife

 Could use predictive information on ravens, raptors, and desert tortoise.

B5-122 cont.

#6 Population-level effects

 Monitoring data could help address how solar impacts different taxa differently.

#7 Mitigation

- Look at deterrents used in other industries (wind, aviation)
- Connect new approaches to systematic monitoring designs

B5-122 cont.

Climate Change

Could also be used to determine species of concern.

Criteria

- Budget & duration
- Would the answer to the question affect decisions?

B5-122 cont.

Group 2 (Day 2)

B5-122 cont.

Any Important elements missing or misrepresented in the conceptual framework?

- These were mostly captured in the discussion after Lee's presentation
- All birds lumped as one. Consider differential impacts to different guilds/species
- Take into account potential benefits and risks? Or relabel "Potential Negative Impacts" which acknowledges that there may be potential benefits.

B5-122 cont.

Can any of the management questions be addressed with existing information/data? What questions would require additional field work?

- Do we have a good understanding of current monitoring protocols? Protocols evolve based on past experience.
- Look at monitoring approaches for uniformity.
- What are the sources of mortality? (Partial).
- How do impacts of development affect different guilds/taxonomies (Partial)
- Most of the questions will need research.
- Some/many effects appear to be location specific. Depend upon landscape and terrain features.
- Use existing data to develop hypothesis and inform the next iteration of research

B5-122 cont.

Additional critical research needs that weren't identified

- Preconstruction monitoring (as research) to establish baseline mortality for areas that will see lots of development.
- How do we gather baseline mortality data? How funded?
- What before/after data already exists?
- Effect of emerging/future/sunsetting technologies? E.g. types of panels, antireflective coatings. tracking/fixed tilt.

B5-122 cont.

What criteria should be considered by the agencies in establishing priorities for future research? Can you rank in terms of importance for guiding future research (e.g. allocation of funds)?

- Prioritize questions that can be answered sooner?
- Cost/difficulty
- Avoid duplication
- Foundationality
- Fills an important gap
- Should different agencies focus on different questions?
- What are the priorities of the individual agencies?
- Scope and applicability
- Unique to solar
- Solicit public comment on criteria & research needs

B5-122 cont.

Other

- No definitive focus yet (as to priorities)
- Need to do background comparisons
- How do we ensure these agreed-upon priorities are carried out by the member agencies (implementation)

B5-122 cont.

Breakout Session 3

Conceptual Framework,

Management Questions, Research

Needs and Priorities

Group 3

- Dan Boff, DOE
- Kirk LaGory
- Amy Fesnock,
- Bill Werner
- Katie Umekubo
- Chuck Griffin
- Juliette Falkner
- Karyn Coppinger
- Brian Borowski, H.T. Harvey
- Matt Hutchinson

B5-122 cont.

B5-122 cont.

Conceptual Framework

- Suggestions included
 - Place solar impact box within human development to show proper context
 - Solar should show as positive effect on climate change
 - Add season and weather as influencing factors
 - Present as hypothesis driven
 - Include avian behavior as factor
 - Define indirect
 - Factors are not comprehensive list. Add "e.g.,"
 - Water availability and use should be placed within solar box
 - Need to include potential benefits (e.g., use more neutral language regarding change rather than just degradation)

B5-122 cont.

Management Questions

- Many questions have landscape context but not included in landscape bin
- Data are available on solar development projections, but may not have specific information on where these would go
- Monitoring data available on limited questions regarding mortality

B5-122 cont.

Research Needs and Priorities

- What are the fundamental data needs to answer questions?
- Focus on basic processes:
 - Why are birds at site?
 - What are they exposed to?
 - What results in fatality?
- What is net effect on birds

Breakout 4 -

B5-122 cont.

- Landscape Framework comments
 - Broader context would be good beyond just solar.
 - Also, put INTO context to ensure it isn't misinterpreted when seen as a standalone document.
 - Should be entitled "pathway for potential impacts";
 - Suggest that at the core, it begins with the concepts lifecycle/life history perspective

B5-122 cont.

Breakout 4

- Management questions comments
 - 'landscape considerations' is not a management question but rather required background for solving other management questions.
 - Importance of background mortality
 - Level of pre-construction needed
 - BACI versus geospatial
 - Understand first what agency's want to see
 - Different ways to determine which guilds/species to study, e.g.
 - disproportional impacts, water birds, subset example of all guilds, other?

B5-122 cont.

Breakout 4

- ASWG compared to CWG questions
 - Feather spots...include clearly in CWG
 - climate change futures with landscape considerations management question
 - Standardization what attributes are needed to determine best methods?
- Criteria Ranking
 - #1 Fundamental need recommend adding this
 - #2 Management
 - #3 Overlap
 - #4 Timeliness



B5-122 cont.

Multiagency Avian-Solar Collaborative Working Group: Stakeholder Workshop

Next Steps

May 10-11, 2016
Sacramento, California











Stakeholder Input Wanted

- All handouts and presentations will be available on the CWG webpage: http://blmsolar.anl.gov/program/avian-solar/
- Stakeholders can comment during this meeting and/or in writing following the workshop by June 1, 2016
- Agencies are seeking input from stakeholders on all matters relevant to the CWG objectives:
 - Concerns about avian-solar issues
 - Relevant existing data and studies
 - Understanding of avian-solar interactions
 - Focus of future research
 - Priorities for research needs
 - Future activities of the CWG
 - Level and mode of future stakeholder engagement

B5-122 cont.

Multiagency CWG Stakeholder Workshop, May 2016

Draft Avian-Solar Science Plan

- Revise draft elements incorporating stakeholder comments
 - Summary of available data
 - Conceptual framework
 - Management questions
- Develop additional elements
 - Prioritization of management questions
 - Implementation plan
 - Comparative cost data
- Draft plan released for stakeholder review mid summer

B5-122 cont.

Multiagency CWG Stakeholder Workshop, May 2016

3

Future Stakeholder Engagement

- A stakeholder webinar will be hosted to present and take comments on the draft avian-solar science plan (late summer 2016)
- For more information:
 - Subscribe for email updates: send request to rollins@anl.gov
 - CWG webpage: http://blmsolar.anl.gov/program/avian-solar/

Multiagency CWG Stakeholder Workshop, May 2016

B5-122 cont.