Docket Number:	09-AFC-07C
Project Title:	Palen Solar Power Project - Compliance
TN #:	202522
Document Title:	Ex.1154 - USFWS February 14, 2014 Memo
Description:	N/A
Filer:	Marie Fleming
Organization:	Galati Blek LLP
Submitter Role:	Applicant Representative
Submission Date:	6/23/2014 4:27:52 PM
Docketed Date:	6/23/2014

Avian Injury and Mortality Data Reported at Solar Energy Projects

February 14, 2014

Several commercial-scale solar facilities have been approved in CA, over the last few years as financial incentive programs has promoted development of renewable energy power plants. Following reports of unusual avian mortalities at some of these facilities, the US Fish and Wildlife Service (Service) developed a standardized data spreadsheet for reporting avian injury and mortality information at renewable energy projects.

The Service has distributed this spreadsheet to projects that are experiencing avian fatalities and projects that we have recently issued Special Purpose Utilities (SPUT) Permits under the Migratory Bird Treaty Act.

Many of the commercial-scale solar projects approved within the last few years are still under construction. Avian mortalities being reported are generally found by construction workers and other staff incidental to their work activities. Consequently, the incidental nature of the data needs to be considered when evaluating the information reported to date. Incidentally collected data do not provide enough information to accurately quantify the scope of actual avian mortalities on a project site. However, these data can provide important information such as the composition of species which may be at risk in the future. In addition, the data provide insights into project features and types of injuries that may be associated with mortalities.

Despite providing some initial insights into avian mortalities, incidental data should not be over-interpreted. Numerical comparisons between individual projects, project technology, or seasons are not possible in the absence of systematic, statistically rigorous mortality monitoring efforts.

Seasonal comparisons of the number of mortalities are not possible during construction because the project areas are increasing over time. In addition, worker activity that may result in incidental reports of mortalities may vary by season or location on the project site (i.e., reduced activity during the extreme heat of summer months), potentially biasing the data.

Though there are important caveats in how these early data can be interpreted, the Service has found these data useful as a general indicator of the potential risks that Commercial-scale solar projects may pose to avian species. The Service plans to utilize these early incidental findings to inform the design of avian mortality monitoring protocols.

Systematic, statistically rigorous avian mortality monitoring will be needed to develop effective best management practices and adaptive management measures to reduce avian mortality at operational renewable energy facilities and for planning future project development.