properly trained in avian issues. This training should encompass the reasons, needs, and methods for reporting avian mortalities, following nest management protocols, disposing of carcasses, and complying with applicable regulations, and understanding the potential consequences of non-compliance. Supplemental training also may be appropriate when there are changes in regulations, permit conditions, or internal policies. APLICsponsored short-courses on avian electrocution, collision, and nest issues are conducted annually at locations throughout the United States. In addition, a two-hour overview presentation of avian issues that can be used for internal company training is available from APLIC (see www.aplic.org).

#### PERMIT COMPLIANCE

An APP can describe the process through which a company will obtain and comply

FIGURE 7.1: Utility crew installing raptor nest platform.

with all necessary avian-related permits. The activities that may require permits include, but are not limited to, nest relocation, temporary possession, depredation, salvage/disposal, and scientific collection.

#### CONSTRUCTION DESIGN STANDARDS

Avian interactions with electrical facilities can cause outages and reduce system reliability. To improve system reliability, avian interactions should be considered when designing and siting new facilities, as well as when operating and maintaining existing facilities. For those reasons, inclusion of accepted standards for both new construction and retrofitting techniques should be included in an APP. Companies can either rely upon construction standards recommended in this document or may develop their own standards that meet or exceed these guidelines. These standards may be used in areas where new construction should be avian-safe, and where existing infrastructure should be retrofitted for avian safety.

## **NEST MANAGEMENT**

An APP may include procedures for managing nests on utility structures (Figure 7.I). This could include procedures for problem nests (ones that need to be relocated or removed) as well as for safe nest sites. These procedures should be explained to company employees during training to ensure consistent treatment of avian nest issues and compliance with regulations or permits related to nest management.

#### AVIAN REPORTING SYSTEM

Although avian mortality reports may be required as a condition of federal or state permits, a utility may also voluntarily monitor relevant avian interactions, including mortalities, by developing an internal reporting system. A well-implemented system can help pinpoint the locations of mortalities and the extent to which they are occurring. These data can be limited to avian mortalities or injuries,





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or could be expanded to track avian nest problems, problem poles or line configurations, and the remedial actions taken. All data should be regularly entered into a searchable database compatible for use in additional analyses (see Risk Assessment Methodology below). Some companies have developed their own bird interaction reporting systems, and the USFWS has created an online bird electrocution reporting system for utilities (see Appendix C, Avian Reporting System).

#### RISK ASSESSMENT METHODOLOGY

A utility can cost-effectively reduce avian mortalities by focusing its efforts on the areas of greatest risk to migratory birds. Therefore, an APP should include a method for evaluating the specific risks a company poses to migratory birds. A risk assessment will often

FIGURE 7.2: Reframing a crossarm to prevent avian electrocutions.

begin with a review of available data that address areas of high avian use, avian mortality, problem nests, established flyways, preferred habitats, prey populations, perch availability, effectiveness of existing procedures, remedial actions, and other factors that can increase avian interactions with utility facilities. The avian reporting system discussed in the previous section is an integral component of this risk assessment, as is the use of avian experts, birders, and biologists who can provide additional information on avian distribution. A risk assessment can be used to develop models that will enable a company to use biological and electrical design information to prioritize poles most in need of modification. A risk assessment may also provide data about the various causes of avian mortality as well as the benefits that birds receive from utility structures.

### **MORTALITY REDUCTION MEASURES**

After completing a risk assessment, a company can focus its efforts on areas of concern, ensure that its responses are not out of proportion to the risks presented to migratory birds, and determine whether avian mortality reduction plans need to be implemented (Figure 7.2). Risk reduction measures may be implemented through the APP by using risk assessment results to direct monitoring and retrofitting activity in the existing system, and to direct attention to avian issues encountered during new construction projects. If a utility finds that avian protection measures are appropriate, it also may choose to develop an implementation schedule for these measures.

#### **AVIAN ENHANCEMENT OPTIONS**

In addition to reducing avian mortality risk, an APP also may include opportunities for a utility to enhance avian populations and/or habitat. This may include installing nest platforms, managing habitats to benefit migratory birds, or working with agencies or organizations in these efforts (Figure 7.3).







FIGURE 7.3: Volunteers and utility personnel work together to create nesting platforms.

Where feasible, new ideas and methods for protecting migratory birds should be encouraged and explored.

#### QUALITY CONTROL

An APP also may include a mechanism for reviewing existing practices and ensuring their efficiency and effectiveness. For instance, a utility may examine its reporting system's performance, or evaluate the techniques and technologies it uses for preventing collisions, electrocutions and problem nests.

#### **PUBLIC AWARENESS**

An APP may include a method for educating the public about the avian electrocution issue, the company's avian protection program, and its successes in avian protection.

#### **KEY RESOURCES**

An APP should identify key resources that address avian protection issues including a list of experts who may be called upon when resolving avian-related problems. Experts could include company specialists, consultants, state and federal resource agents, university faculty, or other conservationists. Engineers may find that company personnel such as environmental specialists can help find creative solutions to avian interaction problems, and that members of external organizations like APLIC can also serve as helpful resources through workshops, materials, and contacts. An understanding of avian behavior can influence how and when avian protection should be provided. An APP that connects biologists with utility decisionmakers may reduce bird mortality and improve system reliability.

# IMPLEMENTING AN AVIAN PROTECTION PLAN



Integrating an APP into an electric utility's operations will help the utility meet demands for reliable, cost-efficient, and environmentally compatible power delivery. A utility that creates and manages an APP will quickly become familiar with avian-related science, engineering, law, and politics. It will also need to establish a program that satisfies the law, utility employees, utility customers, investors, and other interests.

The ease of implementing an APP will depend on the size of a utility's transmission and distribution system, the range of avian species in the service area, and the frequency of bird/power line interactions. The extent of bird/power line interactions may not be realized until several years into a fully implemented

reporting program. Thus, APP implementation and operation is a long-term commitment and a process of continual evaluation and improvement.

An APP may be the first species-oriented environmental compliance initiative to which utility employees are exposed. Depending on the company's culture, the rate of adoption may vary. High-profile endorsements by corporate officers and managers can facilitate a program's adoption. Some larger utilities have effectively linked APP compliance with financial incentives, similar to more common budget, schedule, and safety goal incentives. Compliance with an APP will reduce utility costs in the long term through improved reliability and reduced regulatory risk.





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Management support is critical for a successful program. However, even with management support, successful implementation is unlikely unless all the affected organizations within the utility also support it. An effective way to build a broad consensus during APP preparation is to form a team within the utility that includes representatives from standards, engineering, environmental services, vegetation management, construction and maintenance, public relations, customer service, and other departments that will be impacted by the APP. Considerable input and assistance from team members are needed to understand how APP implementation will best fit the operations of each department. Solutions to reducing avian mortality can be developed that are responsive to the work requirements of each functional unit. In this manner, individuals from each department will feel invested in the mortality reduction solutions they helped develop and will have an interest in assuring APP effectiveness.

Beyond developing and communicating a corporate APP policy, the most important component of an APP is a consistent and mandatory reporting process. An electronic or paper form of documenting bird-power line conflicts (e.g., time, place, equipment) becomes the foundation for appropriate corrective action—both to correct unsafe situations and to build a dataset to guide future engineering/construction needs.

Managing data for these purposes, as well as for meeting any state and federal agency reporting requirements is an important function of APP administration. Using Geographic Information System (GIS) technology to track and report bird mortalities, remedial actions, outages, and avian risks enables a utility to identify problems and to track the effectiveness of its APP.

Use of existing processes and systems (e.g., outage reporting, environmental review, asset management, and accounting) will help control costs of developing and implementing an APP. Whether an APP is driven by an environmental, engineering, or operations department, cooperation will be necessary across all departmental lines to reduce actual and potential avian-power line conflicts. As with any project, better planning yields better results. The ultimate goals of an APP are a measurable decrease in avian-power line fatalities, and an increase in electric service reliability.

A utility's APP will represent the continuation of a long-term proactive conservation partnership between the utility industry, the conservation community, and the USFWS. These voluntary plans will provide utilities with a framework for addressing electrocution hazards, evaluating the risk their power lines pose to birds, and working with the USFWS to conserve federally protected migratory birds.





APPENDIX A

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