Instructions for Creating an Avian Protection Plan—Using the NREA Model

The model plan is intended to be a guideline for you to develop an Avian Protection Plan (APP) for your member-system. You do not need to copy the format or the process exactly. Throughout the plan you will see [Rural Electric System] or [RES] in the body of the text. This is where you would insert the name of your rural electric system or the acronym for your system to personalize the plan. The model is based on discussions with the Nebraska Game and Parks Commission and the U.S. Fish and Wildlife Service and our experience working with Custer Public Power District to complete an APP that could be approved.

The following numbered sections are components that are necessary to include in an APP. The language is substantively similar to our original model plan, but has been modified based on the language that was approved in Custer’s APP.

While the model is meant to make the process easier for your utility to draft a plan, it is not as simple as inserting your utilities name. The risk assessment and your plan of action will be an important part of having your plan approved. These will need to be personalized to your system.

1. **Board Policy**

Each member-system should have a policy relating to Avian Protection. This shows official action by your board of directors to implement the provisions of your Avian Protection Plan.

The Sample policy is intended to assist you in evaluating if your policy covers all the issues necessary and for those without a policy passed by the board, it provides a starting point to develop one. You should create the policy in whatever format you normally use.

1. **Legal Protection of Birds**

This section will be the same for all Avian Protection Plans. It outlines for you and your future staff the laws that must be complied with for avian protection.

1. **Definitions**

This section will be substantially the same for all Avian Protection Plans. You may add additional definitions if they are needed to clarify utility based terminology for those approving or implementing the plan.

1. **Acronyms**

This will be a list of frequently used terms shortened to Acronyms provided for both those implementing, and approving the plan.

1. **Resources**

This section should include all of the resources that are reference or are used in the development of the plan. The resources listed in the model plan should be included in your plan. You may have additional resources to list, especially if you use a consultant to assist you with your risk assessment and APP development.

1. **Contacts**

This is a list of individuals and organizations that help you with the development of your plan or for to contact for assistance in complying certain activities such as conducting a risk assessment, moving nests or dealing with injured wildlife. These individuals may also assist in research and support for implementing innovative measures for avian protection. You may add or subtract from the model listing based on your particular plan and needs.

1. **District Overview**

The District Overview is a synopsis as to how your member-system will be implementing an Avian Protection Plan. The Language in the model plan is based on the language in the Custer Public Power District Plan that was approved by USF&WS. The language in the overview should be specific to your system and may be very similar or could be different depending on how your member-system conducts your assessments and determines risk.

1. **Risk Assessment**

This is a critical component of your APP. A listing of the type of information that should be included is listed in the model plan. Custer PPD’s Risk Assessment language is specific to how they plan to conduct their assessment and what it includes. Your system may do things differently. The language in the model is one example only. This section should include the following;

* Who Conducted Assessment or Who will supervise those doing an ongoing assessment
* Qualifications of Person Conducting Assessment
* Process
  1. Use of Game and Parks Risk Assessment Maps
  2. Ongoing use of the Avian Risk Assessment On-Site Evaluation
* Factors Considered to Determine Risk
  + Existing Bird populations
  + Species conservation status
  + Mortality History/past mortality reports
  + Avian Related Outages
  + Nest locations (Active/Inactive)
  + Habitat
  + Prey populations
  + Structures and design (infrastructure design and age are important considerations)
  + Historic and planned future use of land
* Time Frame of the assessment and how often this will be revisited.
* Categories for Avian Protection—General Timeline as appropriate
  + Areas requiring immediate attention--Proactive
  + Areas that will be updated as system upgrades or maintenance is conducted
  + New Construction or Reconstruction

This should be a comprehensive portion of your document. They will expect maps and resource references in the appendix. It should be clear that the risk assessment will be used to help determine what needs to be done and when it would be done (generally).

1. **Action Plan**

This section should include at least three areas of dialogue

* Mortality Reduction Measures
  + Using the information provided by the Risk Assessment, this is where you will identify what actions that are specifically taken to reduce the risk of collisions, electrocutions, outages, and mortality.
  + You can base the actions on the categories of need and provide a general outline of what will be done. You should be as specific as possible when you are able. Correlate to any maps that are generated in the Risk Assessment process.
    - Proactive
    - Maintenance/Upgrade
    - New Construction
* Avian Enhancement Options
  + If certain patterns of mortality (electrocution or collision) exist how will your utility address those issues
* Public Awareness/Education
  + This is an often under addressed area. Explain how your utility will keep the public informed as to what you are doing. This allows for some positive PR and a greater understanding of how avian mortality and prevention of avian mortality impact their service.
  + This section is an opportunity to educate the public about the actions you are taking regarding avian protection. This is also an area where you can include programs that involve members of the public. Include such components as; with Boy Scout Troops, Eagle Scout Projects, coordinated projects with USF&WS or the Game and Parks Commission. Take advantage of Facebook postings, website postings, and newsletter stories. Include avian protection in High Voltage Demonstration talks. New releases for specific actions taken to protect/enhance bird populations.

1. **Training**

There is an expectation that avian protection is an ongoing process. A commitment to ongoing training is an important part of the APP. NREA, USFWS and the Commission will assist in coordinating training as is identified in the model plan.

1. **Avian Mortality Reporting Program**

This language will be substantively the same for each system. While it is recommended that your system be willing to transport and dispose of birds at the advice of USFWS or the Commission, you are not required to do so. Be sure the language in your plan reflects what you will be doing.

1. **Avian Nest Issues**

Most of the language in this section can be the same for all APPs. Some modification may be necessary based on your action plan.

1. **Re-Build and New Power Line Construction**

There is an expectation that as part of your APP new construction will be built to avian safe standards. Keep in mind this may also be a requirement for access to federal funds/loans for emergency repair and new construction. This section may be the same for all APPs.

1. **Permits**

The language under permits will be the same for all APPs

1. **Annual Review**

There is an expectation that the APP is not a static document and will be reviewed on an annual basis for necessary changes. It will benefit the utility to document their compliance with the plan and keep it on record at your office. This does not need to be submitted to anyone, but will be proof that you are following your APP.

1. **List of Attachments**

Any member-system specific document that is referenced should be included in the appendix. This would include maps and plans. Remember that utility system maps are not for release to the general public. It would be good to indicate on the report that maps and documentation of utility infrastructure must be withheld if there is a request for access from a member of the public.