



Oregon

Tina Kotek, Governor



550 Capitol St. NE
Salem, OR 97301
Phone: 503-378-4040
Toll Free: 1-800-221-8035
FAX: 503-373-7806
www.oregon.gov/energy

To: Oregon Energy Facility Siting Council

From: Sarah Esterson, Senior Policy Advisor

Date: July 17, 2025

Subject: Biglow Canyon Wind Farm – Annual Monitoring for Wildlife Monitoring and Mitigation Plan (Condition 61)

Attachments: Wildlife Monitoring and Mitigation Plan (May 10, 2007)
Annual Wildlife Monitoring Report (April 2025)

Purpose

The Oregon Department of Energy (Department) prepared this staff report for the Energy Facility Siting Council to summarize the results of ongoing wildlife monitoring and results at Biglow Canyon Wind Farm. The Department is required to make available the actual results and allow for public comment. This staff report supports both Council and the public's understanding of the results and of their opportunity to review and comment.

Wildlife Monitoring and Mitigation Plan Overview

Biglow Canyon Wind Farm is a wind power generation facility consisting of 217 wind turbines, with a peak generating capacity of 450 megawatts (MW). The facility is in Sherman County, approximately 2.5 miles northeast of the town of Wasco. The Council issued a site certificate for the facility in 2006.

Condition 61 of the site certificate states that, "The certificate shall conduct wildlife monitoring and mitigation in accordance with the Wildlife Monitoring and Mitigation Plan (WMMP) that is incorporated in the Final Order on Amendment #2 as Attachment A and as may be amended from time to time."

The WMMP requires that the certificate holder implement short- and long-term wildlife monitoring during facility operation. Short-term wildlife monitoring requirements include a 2-year post construction Bird and Bat Fatality Monitoring Program and Avian Use and Behavior Surveys; both wildlife monitoring activities were completed in 2010-12. On-going long-term

wildlife monitoring requirements include:

- Long-Term Raptor Nesting Surveys (Every 5-years for operational life of facility; 2012, 2017, 2022, 2027, etc)
- Wildlife Incident Response and Handling System (Ongoing)

Long-Term Raptor Nesting Surveys

Raptor nesting surveys are required to be completed for the life of the facility, on a 5-year cycle. Raptor nesting surveys were completed in 2022; the next raptor nesting survey will be completed in 2027. The objectives of raptor nesting surveys are to estimate the size of local breeding populations of tree or other above ground-nesting raptor species within a 2-mile radius of the facility, and to determine whether facility operation is contributing to a reduction in nesting activity or nesting success in local populations of the Swainson's hawk (*Buteo swainsoni*), ferruginous hawk (*Buteo regalis*) and golden eagle (*Aquila chrysaetos*). A summary of raptor nesting survey results to date is presented in Table 1 below.

Table 1: Long-Term Raptor Nesting Survey Results for Biglow Canyon Wind Farm

Nest Status	2006	2012	2017	2022	2027
Located Nests	28	24	22	23	TBD
Occupied Nests	10	13	11	16	TBD
Species	2006	2012	2017	2022	2027
Swainson's Hawk	3	3	3	1	TBD
Red-tailed Hawk	7	7	7	9	TBD
Great Horned Owl	0	2	1	4	TBD
Common Raven	0	1	0	1	TBD

Based on the long-term raptor nesting surveys to date, there has been an increase in the total raptor breeding populations from 2006 to 2022. In 2022, there was an increase in the number of red-tailed hawk nests (9) and a decrease in the number of Swainson's hawk nests (one), but the overall number of hawk nests remained the same as all previous surveys.

Comparison of five-year post-construction surveys show variability in nesting success between survey years both within each species and for all species combined. In 2022, nesting success, ratio of successful to occupied nests, and number of young fledged was equal to or above the mean for golden eagles, great horned owls, red-tailed hawks, and all species combined. The single Swainson's hawk nest was predated, and no young were produced in the survey area. All measures of productivity were below the post-construction mean for this species. This lack of productivity is at least partially the result of interactions between species including nest predation and nest site competition. Productivity data for Swainson's hawks should be interpreted cautiously at this time due to the small sample size and incomplete data set. No statistical results were calculated, although State Sensitive Swainson's hawk showed a 66% decrease in observed nests while generalist competitor of the Swainson's hawk, the red-tailed hawk was up 128%. Another nest site competitor, the great horned owl increased four times from one to four nests. These observed potential trends will be tracked in upcoming surveys. The next raptor survey is scheduled for 2027.

Wildlife Incident Response and Handling System

The Wildlife Incident Response and Handling System is a program for responding to and handling avian and bat injuries and fatalities found by personnel at the project site during construction and routine maintenance operations. PGE maintains an Oregon Department of Fish & Wildlife (ODFW) Scientific Take Permit (#051-20, Attachment A) and a U.S. Fish and Wildlife Service (USFWS) Migratory Bird Special Purpose Permit (#MB65566B-0) to lawfully collect and handle protected birds and bats.

In May 2020, PGE received its Biglow Canyon Long-term Eagle Incidental Take Permit (ITP) (#MB63507B-2) from the USFWS. Additional surveys by a third-party contractor began onsite in August 2020 and will continue through August 2023. Consistent with permit requirements, PGE filed annual reports with USFWS for bird and bat incidents reported in 2024 at the facility. In 2024, PGE site staff also attended annual compliance training which includes bird and bat handling instruction and eagle take permit compliance requirements.

One avian fatality was reported in 2024. A small passerine bird, possibly a sparrow or finch, was found incidentally by site staff in the office parking lot on Herin Lane. The incident was detailed in annual permit reports filed electronically with ODFW and USFWS, as required by each permit.

Public Comments on Wildlife Monitoring Results

Section 5 of the WMMP, Data Reporting, establishes an opportunity for the public to review and comment on monitoring results. Specifically, the WMMP states, “The public will have an opportunity to receive information about monitoring results and to offer comment. Within 30 days after receiving the annual report of monitoring results, the Department will make the report available to the public on its website and will specify a time in which the public may submit comments to the Department.”

The Department received the annual monitoring results for the facility on April 30, 2025. In accordance with the terms of the WMMP, the Department provides a copy of the 2024 monitoring results for the Biglow Canyon Wind Farm to the Council for review (attached) and posted a copy to the Department’s project website at: <http://www.oregon.gov/energy/facilities-safety/facilities/Pages/BCW.aspx> and has established a 30-day timeframe to accept public comments.

Comments are due within 30-days of posting, or **August 18, 2025 at 5:00 p.m.** and may be submitted to Sarah Esterson at sarah.esterson@energy.oregon.gov

Attachments: Wildlife Monitoring and Mitigation Plan (May 10, 2007)
Annual Wildlife Monitoring, Habitat Mitigation and Revegetation Report (2024)

Attachment 1: Wildlife Monitoring and Mitigation Plan (May 10, 2007)

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN

[MAY 10, 2007]

1 This plan describes wildlife monitoring that the certificate holder shall conduct during
2 operation of the Biglow Canyon Wind Farm (BCWF).¹ The monitoring objectives are to
3 determine whether operation of the facility causes significant fatalities of birds and bats and to
4 determine whether the facility results in a loss of habitat quality. The BCWF facility consists of
5 up to 225 wind turbines with a maximum generating capacity of 450 MW, up to 10 permanent
6 meteorological towers and other related or supporting facilities as described in the site certificate.
7 The BCWF will be built in phases.

8 The certificate holder shall use experienced personnel to manage the monitoring required
9 under this plan and properly trained personnel to conduct the monitoring, subject to approval by
10 the Oregon Department of Energy (Department) as to professional qualifications. For all
11 components of this plan except the Raptor Nesting Surveys and the Wildlife Incident Response
12 and Handling System, the certificate holder shall direct a qualified independent third-party
13 biological monitor, as approved by the Department, to perform monitoring tasks.

14 The Wildlife Monitoring and Mitigation Plan for the BCWF has the following
15 components:

- 16 1) Fatality Monitoring Program including:
 - 17 a) Removal Trials
 - 18 b) Searcher Efficiency Trials
 - 19 c) Fatality Monitoring Search Protocol
 - 20 d) Statistical Analysis
- 21 2) Raptor Nesting Surveys
- 22 3) Avian Use and Behavior Surveys
- 23 4) Wildlife Incident Response and Handling System

24 Following is a discussion of the components of the monitoring plan, statistical analysis
25 methods for fatality data, data reporting and potential mitigation.

26 The selection of the mitigation actions that the certificate holder may be required to
27 implement under this plan should allow for flexibility in creating appropriate responses to
28 monitoring results that cannot be known in advance. If the Department determines that
29 mitigation is needed, the certificate holder shall propose appropriate mitigation actions to the
30 Department and shall carry out mitigation actions approved by the Department, subject to review
31 by the Oregon Energy Facility Council (Council).

¹ This plan is incorporated by reference in the site certificate for the BCWF and must be understood in that context. It is not a “stand-alone” document. This plan does not contain all mitigation required of the certificate holder.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

1. Fatality Monitoring

(a) Definitions and Methods

Seasons

This plan uses the following dates for defining seasons:

Season	Dates
Spring Migration	March 16 to May 15
Summer/Breeding	May 16 to August 15
Fall Migration	August 16 to October 31
Winter	November 1 to March 15

Search Plots

The certificate holder shall conduct fatality monitoring within search plots. The certificate holder, in consultation with the Oregon Department of Fish and Wildlife (ODFW), shall select search plots based on the following sampling scheme, consistent with the sample size requirements for that phase of the facility, as outlined below: On each of the nine turbine strings that extend toward the John Day River, the certificate holder shall include in search plots the two turbines closest to the river for each phase in which these turbines are built. In addition, the certificate holder shall include, for each phase, representative turbines distributed throughout the site, consistent with the sample size described below. Each search plot will contain one turbine. Search plots will be square or circular. Circular search plots will be centered on the turbine location and will have a radius equal to the maximum blade tip height of the turbine contained within the plot. "Maximum blade tip height" is the turbine hub-height plus one-half the rotor diameter. Square search plots will be of sufficient size to contain a circular search plot as described above.

The certificate holder shall provide maps of the search plots to the Department and ODFW before beginning fatality monitoring at the facility. The certificate holder will use the same search plots for each search conducted during each monitoring year. During the second monitoring year, the same end-of-row turbines nearest the John Day River will be sampled, but the other search plots will be selected from the turbines not sampled during the first monitoring year.

Sample Size

The sample size for fatality monitoring is the number of turbines searched per monitoring year. The facility will be built in phases. For the first phase of development (in which 76 turbines will be built), the certificate holder shall conduct fatality monitoring during the first two monitoring years in search plots that include 50 turbines.

The sample size for future phases of the facility, if they are built, will include search plots for a minimum of 40 percent of the wind turbines in that phase but not fewer than 50 turbines, unless the entire phase is fewer than 50 turbines, in which event all turbines will be sampled. The sample size might be larger if, under Section 1(g) of this plan, mitigation is required based on the results of fatality monitoring of the first phase.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

If no mitigation is required under Section 1(g) of this plan based on the results of fatality monitoring of the first phase, then the sample size for monitoring future phases of the facility may be reduced appropriately if the Department concurs.

If mitigation is required under Section 1(g) of this plan based on the results of fatality monitoring of the first phase, then the certificate holder shall propose an appropriate sample size for monitoring the next phase of the facility. The need for, and scope of, fatality monitoring for subsequent phases are subject to the approval of the Department.

Scheduling and Sampling Frequency

Fatality monitoring will begin upon the commencement of commercial operation of the facility. Fatality monitoring for each subsequent phase will begin upon commercial operation of that phase.

For each phase, the first fatality monitoring year will commence on the first day of the month following the commercial operation date of that phase of the facility and will conclude twelve months later (for example, if commercial operation begins in October of 2007, the monitoring year will commence on November 1, 2007, and conclude on October 31, 2008). Subsequent monitoring years of that phase will follow the same schedule (for example, the second monitoring year would begin November 1, 2008) unless the second fatality-monitoring year is postponed with the concurrence of the Department.

In each monitoring year, the certificate holder shall conduct fatality-monitoring searches at the rates of frequency shown below. Over the course of one monitoring year, the certificate holder would conduct 16 searches², as follows:

Season	Frequency
Spring Migration	2 searches per month (4 searches)
Summer/Breeding	1 search per month (3 searches)
Fall Migration	2 searches per month (5 searches)
Winter	1 search per month (4 searches)

Duration of Fatality Monitoring

Fatality monitoring of the first phase of the facility will be complete after two monitoring years, except as follows: A worst-case analysis will be used to resolve any uncertainty in the results of the two years of monitoring data for purposes of determining the mitigation requirements for the facility. If the first two years of monitoring data indicate the potential for unexpected impacts of a type that cannot be resolved appropriately by worst-case analysis and appropriate mitigation, additional, targeted monitoring may be conducted for the first phase of the facility for up to an additional two years before determining the mitigation requirements for the facility, or, alternatively, sample sizes larger than those outlined above will be used in monitoring of subsequent phases of development of the facility.

Meteorological Towers

The facility will most likely use non-guyed meteorological towers. Non-guyed towers are known to cause little if any bird and bat mortality. Therefore, monitoring will not occur at non-

² Fewer than 16 searches may be conducted if searches are not possible due to safety reasons or severe weather.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

guyed meteorological towers. If the meteorological towers are guyed, the certificate holder shall search all towers on the same monitoring schedule as fatality monitoring. The certificate holder will use circular search plots. The radius of the circular search plots will extend a minimum of 5 meters beyond the most distant guy wire anchor point.

(b) Removal Trials

The objective of the removal trials is to estimate the length of time avian and bat carcasses remain in the search area. Carcass removal studies will be conducted during each season in the vicinity of the search plots. Estimates of carcass removal rates will be used to adjust carcass counts for removal bias. "Carcass removal" is the disappearance of a carcass from the search area due to predation, scavenging or other means such as farming activity. Removal rates will be estimated by size class, habitat and season.

During the first phase, the certificate holder shall conduct carcass removal trials within each of the seasons defined above during the years in which fatality monitoring occurs. During the first year in which fatality monitoring occurs, trials will occur in at least eight different calendar weeks in a year, with at least one calendar week between starting dates. Trials will be spread throughout the year to incorporate the effects of varying weather, farming practices and scavenger densities. At least two trials will be started in each season. Each trial will use at least 20 carcasses. For each trial, at least 5 small bird carcasses and at least 5 large bird carcasses will be distributed in cultivated agriculture habitat and at least 3 small bird carcasses and at least 3 large bird carcasses will be distributed in non-cultivated habitat (grassland/shrub-steppe and CRP). In a year, about 100 carcasses will be placed in cultivated agriculture and about 60 in non-cultivated grassland/shrub-steppe and CRP for a total of about 160 trial carcasses. The number of removal trials may be reduced to one per season (80 trial carcasses) during the second year of fatality monitoring, subject to approval by the Department, if the certificate holder can demonstrate that the calculation of fatality rates will continue to have statistical validity with the reduced sample size.

The need for, and scope of, removal trials for subsequent phases may be modified based on the variability of results of removal trials for the first phase, subject to the approval of the Department.

The "small bird" size class will use carcasses of house sparrows, starlings, commercially available game bird chicks or legally obtained native birds to simulate passerines. The "large bird" size class will use carcasses of raptors provided by agencies, commercially available adult game birds or cryptically colored chickens to simulate raptors, game birds and waterfowl. If fresh bat carcasses are available, they may also be used.

To avoid confusion with turbine-related fatalities, planted carcasses will not be placed in fatality monitoring search plots. Planted carcasses will be placed in the vicinity of search plots but not so near as to attract scavengers to the search plots. The planted carcasses will be located randomly within the carcass removal trial plots.

Carcasses will be placed in a variety of postures to simulate a range of conditions. For example, birds will be: 1) placed in an exposed posture (e.g., thrown over the shoulder), 2) hidden to simulate a crippled bird (e.g., placed beneath a shrub or tuft of grass) and, 3) partially hidden. Trial carcasses will be marked discreetly for recognition by searchers and other personnel. Trial carcasses will be left at the location until the end of the carcass removal trial.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

It is expected that carcasses will be checked as follows, although actual intervals may vary. Carcasses will be checked for a period of 40 days to determine removal rates. They will be checked about every day for the first 4 days, and then on day 7, day 10, day 14, day 20, day 30 and day 40. This schedule may vary depending on weather and coordination with the other survey work. At the end of the 40-day period, the trial carcasses and scattered feathers will be removed.

(c) Searcher Efficiency Trials

The objective of searcher efficiency trials is to estimate the percentage of bird and bat fatalities that searchers are able to find. The certificate holder shall conduct searcher efficiency trials on the fatality monitoring search plots in both grassland/shrub-steppe and cultivated agriculture habitat types. Searcher efficiency will be estimated by size class, habitat type and season. Estimates of searcher efficiency will be used to adjust carcass counts for detection bias.

During the first phase, searcher efficiency trials will be conducted in each season as defined above, during the years in which the fatality monitoring occurs. Trials will be spread throughout the year to incorporate the effects of varying weather, farming practices and scavenger densities. At least two trials will be conducted in each season. Each trial will use about 20 carcasses, although the number will be variable so that the searcher will not know the total number of trial carcasses being used in any trial. For each trial, both small bird and large bird carcasses will be used in about equal numbers. "Small bird" and "large bird" size classes and carcass selection are as described above for the removal trials. A greater proportion of the trial carcasses will be distributed in cultivated agriculture habitat than in non-cultivated habitat (grassland/shrub steppe and CRP). In a year, about 100 carcasses will be placed in cultivated agriculture and about 60 in non-cultivated grassland/shrub steppe and CRP for a total of about 160 trial carcasses. The number of searcher efficiency trials may be reduced to one per season (80 trial carcasses) during the second year of fatality monitoring, subject to approval by the Department, if the certificate holder can demonstrate that the calculation of fatality rates will continue to have statistical validity with the reduced sample size.

The need for, and scope of, searcher efficiency trials for subsequent phases may be modified based on the variability of results of searcher efficiency trials for the first phase, subject to the approval of the Department.

Personnel conducting searches will not know in advance when trials are conducted; nor will they know the location of the trial carcasses. If suitable trial carcasses are available, trials during the fall season will include several small brown birds to simulate bat carcasses. Legally obtained bat carcasses will be used if available.

On the day of a standardized fatality monitoring search (described below) but before the beginning of the search, efficiency trial carcasses will be placed at random locations within areas to be searched. If scavengers appear attracted by placement of carcasses, the carcasses will be distributed before dawn.

Searcher efficiency trials will be spread over the entire season to incorporate effects of varying weather and vegetation growth. Carcasses will be placed in a variety of postures to simulate a range of conditions. For example, birds will be: 1) placed in an exposed posture (thrown over the shoulder), 2) hidden to simulate a crippled bird and 3) partially hidden.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

Each non-domestic carcass will be discreetly marked so that it can be identified as an efficiency trial carcass after it is found. The number and location of the efficiency trial carcasses found during the carcass search will be recorded. The number of efficiency trial carcasses available for detection during each trial will be determined immediately after the trial by the person responsible for distributing the carcasses.

If new searchers are brought into the search team, additional detection trials will be conducted to ensure that detection rates incorporate searcher differences.

(d) Coordination with the Klondike III Wind Project

The proposed Klondike III Wind Project lies to the south of the BCWF on similar terrain and habitat. The Council has approved site certificates for both facilities and requires similar wildlife monitoring. Subject to the approval of both certificate holders and the Department, the number of trials at each site and the number of trial carcasses used at each site can be reduced by combining the removal data and efficiency data from both facilities, if the certificate holder can demonstrate that the calculation of fatality rates will continue to have statistical validity for both facilities and that combining the data will not affect any other requirements of the monitoring plans for either facility.

(e) Fatality Monitoring Search Protocol

The objective of fatality monitoring is to estimate the number of bird and bat fatalities that are attributable to facility operation and associated variances. The certificate holder shall conduct fatality monitoring using standardized carcass searches.

The certificate holder shall use a worst-case analysis to resolve any uncertainty in the results and to determine whether the data indicate that additional mitigation should be considered. The Department may require additional, targeted monitoring if the data indicate the potential for significant impacts that cannot be addressed by worst-case analysis and appropriate mitigation.

The certificate holder shall estimate the number of avian and bat fatalities attributable to operation of the facility based on the number of avian and bat fatalities found at the facility site. All carcasses located within areas surveyed, regardless of species, will be recorded and, if possible, a cause of death determined based on blind necropsy results. If a different cause of death is not apparent, the fatality will be attributed to facility operation. The total number of avian and bat carcasses will be estimated by adjusting for removal and searcher efficiency bias.

Personnel trained in proper search techniques (“the searchers”) will conduct the carcass searches by walking parallel transects within the search plots.³ Transects will be initially set at 6 meters apart in the area to be searched. A searcher will walk at a rate of about 45 to 60 meters per minute along each transect searching both sides out to three meters for casualties. Search area and speed may be adjusted by habitat type after evaluation of the first searcher efficiency trial. The searchers will record the condition of each carcass found, using the following condition categories:

- Intact – a carcass that is completely intact, is not badly decomposed and shows no sign of being fed upon by a predator or scavenger

³ Where search plots are adjacent, the search area may be rectangular.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

- Scavenged – an entire carcass that shows signs of being fed upon by a predator or scavenger, or portions of a carcass in one location (e.g., wings, skeletal remains, legs, pieces of skin, etc.)
- Feather Spot – 10 or more feathers at one location indicating predation or scavenging or 2 or more primary feathers

All carcasses (avian and bat) found during the standardized carcass searches will be photographed as found, recorded and labeled with a unique number. Distance from observer to the carcass will be measured (to the nearest 0.25 meters), as will the perpendicular distance from the transect line to the carcass. Each carcass will be bagged and frozen for future reference and possible necropsy. A copy of the data sheet for each carcass will be kept with the carcass at all times. For each carcass found, searchers will record species, sex and age when possible, date and time collected, location, condition (e.g., intact, scavenged, feather spot) and any comments that may indicate cause of death. Searchers will map the find on a detailed map of the search area showing the location of the wind turbines and associated facilities such as power lines. The certificate holder shall coordinate collection of state endangered, threatened, sensitive or other state protected species with ODFW. The certificate holder shall coordinate collection of federally-listed endangered or threatened species and Migratory Bird Treaty Act protected avian species with the U.S. Fish and Wildlife Service (USFWS). The certificate holder shall obtain appropriate collection permits from ODFW and USFWS.

The searchers might discover carcasses incidental to formal carcass searches (e.g., while driving within the project area). For each incidentally discovered carcass, the searcher shall identify, photograph, record data and collect the carcass as would be done for carcasses within the formal search sample during scheduled searches

If the incidentally discovered carcass is found within a formal search plot, the fatality data will be included in the calculation of fatality rates. If the incidentally discovered carcass is found outside a formal search plot, the data will be reported separately.

The certificate holder shall coordinate collection of incidentally discovered state endangered, threatened, sensitive or other state protected species with ODFW. The certificate holder shall coordinate collection of incidentally discovered federally-listed endangered or threatened species and Migratory Bird Treaty Act protected avian species with the USFWS.

The certificate holder shall develop and follow a protocol for handling injured birds. Any injured native birds found on the facility site will be carefully captured by a trained project biologist or technician and transported to Jean Cypher (wildlife rehabilitator) in The Dalles, the Blue Mountain Wildlife Rehabilitation Center in Pendleton or the Audubon Bird Care Center in Portland in a timely fashion.⁴ The certificate holder shall pay costs, if any are charged, for time and expenses related to care and rehabilitation of injured native birds found on the site, unless the cause of injury is clearly demonstrated to be unrelated to the facility operations.

(f) Statistical Methods for Fatality Estimates

The estimate of the total number of wind facility-related fatalities is based on:

⁴ The people and centers listed here may be changed with Department approval.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

- (1) The observed number of carcasses found during standardized searches during the two monitoring years for which the cause of death is attributed to the facility.⁵
- (2) Searcher efficiency expressed as the proportion of planted carcasses found by searchers.
- (3) Non-removal rates expressed as the estimated average probability a carcass is expected to remain in the study area and be available for detection by the searchers during the entire survey period.

Definition of Variables

The following variables are used in the equations below:

c_i	the number of carcasses detected at plot i for the study period of interest (e.g., one year) for which the cause of death is either unknown or is attributed to the facility
n	the number of search plots
k	the number of turbines searched (includes the turbines centered within each search plot and a proportion of the number of turbines adjacent to search plots to account for the effect of adjacent turbines on the 90-meter search plot buffer area)
\bar{c}	the average number of carcasses observed per turbine per year
s	the number of carcasses used in removal trials
s_c	the number of carcasses in removal trials that remain in the study area after 40 days
se	standard error (square of the sample variance of the mean)
t_i	the time (days) a carcass remains in the study area before it is removed
\bar{t}	the average time (days) a carcass remains in the study area before it is removed
d	the total number of carcasses placed in searcher efficiency trials
p	the estimated proportion of detectable carcasses found by searchers
I	the average interval between searches in days
$\hat{\pi}$	the estimated probability that a carcass is both available to be found during a search and is found
m_i	the estimated annual average number of fatalities per turbine per year, adjusted for removal and observer detection bias
C	nameplate energy output of turbine in megawatts (MW)

Observed Number of Carcasses

The estimated average number of carcasses (\bar{c}) observed per turbine per year is:

⁵ If a different cause of death is not apparent, the fatality will be attributed to facility operation.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

$$\bar{c} = \frac{\sum_{i=1}^n c_i}{k} . \quad (1)$$

Estimation of Carcass Removal

Estimates of carcass removal are used to adjust carcass counts for removal bias. Mean carcass removal time (\bar{t}) is the average length of time a carcass remains at the site before it is removed:

$$\bar{t} = \frac{\sum_{i=1}^s t_i}{s - s_c} . \quad (2)$$

This estimator is the maximum likelihood estimator assuming the removal times follow an exponential distribution and there is right-censoring of data. Any trial carcasses still remaining at 40 days are collected, yielding censored observations at 40 days. If all trial carcasses are removed before the end of the trial, then s_c is 0, and \bar{t} is just the arithmetic average of the removal times. Removal rates will be estimated by carcass size (small and large) and season.

Estimation of Observer Detection Rates

Observer detection rates (i.e., searcher efficiency rates) are expressed as p , the proportion of trial carcasses that are detected by searchers. Observer detection rates will be estimated by carcass size and season.

Estimation of Facility-Related Fatality Rates

The estimated per turbine annual fatality rate (m_t) is calculated by:

$$m_t = \frac{\bar{c}}{\hat{\pi}} , \quad (3)$$

where $\hat{\pi}$ includes adjustments for both carcass removal (from scavenging and other means) and observer detection bias assuming that the carcass removal times t_i follow an exponential distribution unless a different assumption about carcass removal is made with the approval of the Department. Under these assumptions, this detection probability is estimated by:

$$\hat{\pi} = \frac{\bar{t} \cdot p}{I} \cdot \left[\frac{\exp\left(\frac{I}{\bar{t}}\right) - 1}{\exp\left(\frac{I}{\bar{t}}\right) - 1 + p} \right] . \quad (4)$$

The estimated per MW annual fatality rate (m) is calculated by:

$$m = \frac{m_t}{C} . \quad (5)$$

The certificate holder shall calculate fatality estimates for: (1) all birds, (2) small birds, (3) large birds, (4) raptors, (5) target grassland birds, (6) nocturnal avian migrants, 7) avian State Sensitive Species listed under OAR 635-100-0040, and 8) bats. The final reported estimates of m , associated standard errors and 90% confidence intervals will be calculated using bootstrapping (Manly 1997). Bootstrapping is a computer simulation technique that is useful for

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

calculating point estimates, variances and confidence intervals for complicated test statistics. For each iteration of the bootstrap, the plots will be sampled with replacement, trial carcasses will be sampled with replacement and \bar{c} , \bar{t} , p , $\hat{\pi}$ and m will be calculated. A total of 5,000 bootstrap iterations will be used. The reported estimates will be the means of the 5,000 bootstrap estimates. The standard deviation of the bootstrap estimates is the estimated standard error. The lower 5th and upper 95th percentiles of the 5000 bootstrap estimates are estimates of the lower limit and upper limit of 90% confidence intervals.

Nocturnal Migrant and Bat Fatalities

Differences in observed nocturnal avian migrant and bat fatality rates for lit turbines, unlit turbines that are adjacent to lit turbines, and unlit turbines that are not adjacent to lit turbines will be compared graphically and statistically.

(g) Mitigation

Mitigation may be appropriate if analysis of the fatality data collected after two monitoring years shows fatality rates for avian species that exceed a threshold of concern. For the purpose of determining whether a threshold has been exceeded, the certificate holder shall calculate the average annual fatality rates for the species groups after the initial two years of monitoring. Based on current knowledge of the species that are likely to use the habitat in the area of the facility, the following thresholds apply to the BCWF:

Species Group	Threshold of Concern (fatalities per MW)
Raptors (All eagles, hawks, falcons and owls, including burrowing owls.)	0.09
Raptor species of special concern (Swainson's hawk, ferruginous hawk, peregrine falcon, golden eagle, bald eagle, burrowing owl and any federal threatened or endangered raptor species.)	0.06
Target grassland birds (All native bird species that rely on grassland habitat and are either resident species, occurring year round, or species that nest in the area, excluding horned lark, burrowing owl and northern harrier.)	0.59
State sensitive avian species listed under OAR 635-100-0040 (Excluding raptors listed above.)	0.20
Bat species as a group	2.50
Guyed Meteorological Tower Mortality	
Raptor T&E species and raptor species of special concern, as a group (Swainson's hawk, ferruginous hawk, golden eagle and burrowing owl; bald eagle, peregrine falcon, and any other federal threatened or endangered raptor species)	0.20/ guyed tower
Avian State Sensitive Species listed under OAR 635-100-0040 (Excluding raptors)	0.20/ guyed tower

In addition, mitigation may be appropriate if fatality rates for individual species (especially State Sensitive Species) are higher than expected and at a level of biological concern. If the data show that a threshold of concern for a species group has been exceeded or that the fatality rate for any individual species is at a level of biological concern, mitigation shall be required if the Department determines that mitigation is appropriate based on analysis of the data and any other significant information available at the time. If mitigation is appropriate, the certificate holder, in consultation with ODFW, shall propose mitigation measures designed to

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

benefit the affected species. This may take into consideration whether mitigation required or provided for other impacts, such as raptor nesting or grassland bird displacement, would also benefit the affected species.

The certificate holder shall implement mitigation as approved by the Council. The Department may recommend additional, targeted data collection if the need for mitigation is unclear based on the information available at the time. The certificate holder shall implement such data collection as approved by the Council.

Mitigation shall be designed to benefit the affected species group. Mitigation may include, but is not limited to, protection of nesting habitat for the affected group of native species through a conservation easement or similar agreement. Tracts of land that are intact and functional for wildlife are preferable to degraded habitat areas. Preference should be given to protection of land that would otherwise be subject to development or use that would diminish the wildlife value of the land. In addition, mitigation measures might include: enhancement of the protected tract by weed removal and control; increasing the diversity of native grasses and forbs; planting sagebrush or other shrubs; constructing and maintaining artificial nest structures for raptors; reducing cattle grazing; improving wildfire response; and local research that would aid in understanding more about the species and conservation needs.

If the threshold for bats species as a group is exceeded, the certificate holder shall contribute to Bat Conservation International or to a Pacific Northwest bat conservation group (\$10,000 per year for three years) to fund new or ongoing research in the Pacific Northwest to better understand impacts to the bat species impacted by the facility and to develop possible ways to reduce impacts to the affected species.

In addition, mitigation may be appropriate if fatality rates for a State Sensitive bat species listed under OAR 635-100-0040 are higher than expected and at a level of concern. If the data show that a threshold of concern for a species group has been exceeded or that the fatality rate for any individual species is at a level of concern, mitigation shall be required if the Department determines that mitigation is appropriate based on analysis of the data and any other significant information available at the time. If mitigation is appropriate, the certificate holder, in consultation with ODFW, shall propose mitigation measures designed to benefit the affected species. The certificate holder shall implement mitigation as approved by the Council.

2. Raptor Nest Surveys

The objectives of raptor nest surveys are to estimate the size of the local breeding populations of tree or other above-ground-nesting raptor species in the vicinity of the facility and to determine whether operation of the facility results in a reduction of nesting activity or nesting success in the local populations of the following raptor species: Swainson's hawk, ferruginous hawk and golden eagle. The certificate holder shall direct a qualified biologist, approved by the Department, to conduct the raptor nest surveys. The Department has approved the qualifications of the four biologists identified in the Final Order on Amendment #2. The certificate holder may select other qualified biologists to conduct the raptor nest surveys, subject to Department approval.

(a) Survey Protocol

For the species listed above, aerial and ground surveys will be used to gather nest success data on active nests, nests with young and young fledged. The certificate holder will share the

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

data with state and federal biologists. The certificate holder shall conduct two years of post-construction raptor nest surveys for each phase of construction and long-term raptor nest surveys for the completed facility during the sensitive nesting and breeding season. One year of post-construction surveys will be done in the first nesting season after construction of the phase is completed. The second year of post-construction surveys will be done after construction of the phase is completed at a time recommended by the certificate holder and approved by the Department. Long-term surveys will be conducted starting in the fifth year following completion of the last post-construction survey and each five years thereafter for the life of the facility. The certificate holder may collaborate with other certificate holders in the vicinity of the facility in the development of useful information about future impacts on raptor nesting activity and nesting success.

Prior to the raptor nesting surveys, the certificate holder shall review the locations of known raptor nests based on the BCWF and Klondike Wind Project pre-construction surveys as well as any nest survey data collected after construction. All known nest sites and any new nests observed within the BCWF site and within two miles of the BCWF site will be given identification numbers. Nest locations will be recorded on U.S. Geological Survey 7.5-minute quadrangle maps. Global positioning system coordinates will be recorded for each nest and integrated with the baseline database. Locations of inactive nests will also be recorded as they may become occupied during future years.

During each raptor nesting monitoring year, the certificate holder shall conduct a minimum of one helicopter survey in late May or early June within the BCWF site and a 2-mile zone around the turbines to determine nest occupancy. Determining nest occupancy will likely require two visits to each nest: The second visit may be done by air or by ground as appropriate. For occupied nests of the species identified above, the certificate holder shall determine nesting success by a minimum of one ground visit to determine species, number of young and nesting success. "Nesting success" means that the young have successfully fledged (the young are independent of the core nest site). Nests that cannot be monitored due to the landowner denying access will be checked from a distance where feasible.

(b) Mitigation

The certificate holder shall analyze the raptor nesting data collected after two monitoring years to determine whether a reduction in either nesting success or nest use has occurred in the vicinity of the BCWF. If the analysis indicates a reduction in nesting success by Swainson's hawk, ferruginous hawk or golden eagle within two miles of the facility (including the area within the BCWF site), then the certificate holder shall propose appropriate mitigation and shall implement mitigation as approved by the Council. At a minimum, if the analysis shows that any of these species has abandoned a nest territory within the facility site or within ½ mile of the facility site, or has not fledged any young over the two-year period within the facility site or within ½ mile of the facility site, the certificate holder shall assume the abandonment or unsuccessful fledging is the result of the facility unless another cause can be demonstrated convincingly. If the BCWF facility and the Klondike III facility are both required to provide mitigation for the same nest, the two certificate holders shall coordinate the required mitigation with the approval of the Department.

Given the very low buteo nesting densities in the area, statistical power to detect a relationship between distance from a wind turbine and nesting parameters (*e.g.*, number of

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

fledglings per reproductive pair) will be very low. Therefore, impacts may have to be judged based on trends in the data, results from other wind energy facility monitoring studies and literature on what is known regarding the populations in the region.

If the analysis shows that mitigation is appropriate, the certificate holder shall propose mitigation for the affected species in consultation with the Department and ODFW, and shall implement mitigation as approved by the Council. Mitigation should be designed to benefit the affected species or contribute to overall scientific knowledge and understanding of what causes nest abandonment or nest failure. Mitigation may be designed to proceed in phases over several years. It may include, but is not limited to, additional raptor nest monitoring, protection of natural nest sites from human disturbance or cattle activity (preferably within the general area of the facility), or participation in research projects designed to improve scientific understanding of the needs of the affected species. Mitigation may take into consideration whether mitigation required or provided for other impacts, such as fatality impacts or grassland bird displacement, would also benefit the raptor species whose nesting success was adversely affected.

3. Avian Use and Behavior Surveys

The certificate holder shall conduct a before/after avian behavior and monitoring study to determine whether operation of the BCWF reduces bird use and abundance in the area (often referred to as displacement). The results of this study will aid in estimating indirect avian impacts of the BCWF and guide potential mitigation.

The before/after study will use two of the observation stations that were used during the baseline study (H and I) and two new survey stations (A5 and A6).⁶ Avian use and behavior will be monitored at these four stations 6 times each month from November 2005 – August 15, 2006 (pre-construction period) and 6 times each month during two post-construction monitoring years (after construction of wind turbines located near these survey stations).⁷

These four stations are located in the northeastern portion of the BCWF area near the John Day River canyon. The areas surrounding these survey stations were subject to numerous micro-siting decisions during facility layout. Primary micro-siting decisions included shortening and re-orientating turbine corridors to avoid native habitat, maintaining a minimum one-mile distance from the centerline of the John Day River, and avoiding locating turbines on steep slopes.

Each survey will consist of one 30-minute observation period at each of these four stations using the same protocol that was used for baseline data collection. In particular, raptor and waterfowl use estimates and behavior relative to turbine locations and flight path maps will be compared between the pre- and post-construction periods to provide information on raptor and waterfowl displacement and to estimate indirect impacts on raptors and waterfowl. The phrase “behavior relative to turbine locations” is intended to address observations of behavior that is different near turbines compared to behavior away from turbines.

In addition to surveys at these four stations, searchers will also record bird species observed and their behavior relative to turbine locations before or after each standardized carcass

⁶ The observation stations are identified in a report by Western EcoSystems Technology, Inc., “John Day Avian Studies for the Biglow Canyon Wind Farm Project, February 2007.”

⁷ Fewer than 6 monitoring sessions may be conducted if necessary due to safety reasons or severe weather.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

search (as described in Section 1(e) above). Observations will be recorded during 5-minute surveys at each turbine sampled during the fatality monitoring program, using standard variable circular plot point count survey methods. Collection and recording of these additional observations of live birds will be carried out in a manner that does not distract searchers from carrying out the standardized carcass searches.

All of these avian use and behavior data, as well as raptor and waterfowl mortality observed at the turbines near these stations, will be used to understand direct and indirect impacts of the BCWF facility on raptors, waterfowl and other avian species. The certificate holder shall include an analysis of this data in the reports described in Section 5.

4. Biglow Wildlife Incident Response and Handling System

The Wildlife Incident Response and Handling System is a monitoring program set up for responding to and handling avian and bat casualties found by construction and maintenance personnel during construction and operation of the facility. This monitoring program includes the initial response, the handling and the reporting of bird and bat carcasses discovered incidental to construction and maintenance operations ("incidental finds"). Construction and maintenance personnel will be trained in the methods needed to carry out this program.

All carcasses discovered by construction or maintenance personnel will be photographed, recorded and collected.

If construction or maintenance personnel find carcasses within the plots for protocol searches, they will notify a qualified biologist, as approved by the Department, who will collect the carcasses. The fatality data will be included in the calculation of fatality rates.

If construction or maintenance personnel discover incidental finds that are not within plots for fatality monitoring protocol searches, they will notify a qualified biologist, as approved by the Department, and the carcass will be collected by a carcass-handling permittee (a person who is listed on state and federal scientific or salvage collection permits). Data for these incidental finds will be reported separately from standardized fatality monitoring data.

The certificate holder shall coordinate collection of state endangered, threatened, sensitive or other state protected species with ODFW. The certificate holder shall coordinate collection of federally-listed endangered or threatened species and Migratory Bird Treaty Act protected avian species with the USFWS.

5. Data Reporting

The certificate holder will report the monitoring data and analysis to the Department. Monitoring data include fatality monitoring program data, raptor nest survey data, avian use and behavior survey data and data on incidental finds by fatality searchers and BCWF personnel. The report may be included in the annual report required under OAR 345-026-0080 or may be submitted as a separate document at the same time the annual report is submitted. In addition, the certificate holder shall provide to the Department any data or record generated in carrying out this monitoring plan upon request by the Department.

The certificate holder shall immediately notify USFWS and ODFW, respectively, in the event that any federal or state endangered or threatened species are killed or injured on the facility site.

BIGLOW CANYON WIND FARM: WILDLIFE MONITORING AND MITIGATION PLAN
[MAY 10, 2007]

1 The public will have an opportunity to receive information about monitoring results and
2 to offer comment. Within 30 days after receiving the annual report of monitoring results, the
3 Department will make the report available to the public on its website and will specify a time in
4 which the public may submit comments to the Department.⁸

6. Amendment of the Plan

5 This Wildlife Monitoring and Mitigation Plan may be amended from time to time by
6 agreement of the certificate holder and the Council. Such amendments may be made without
7 amendment of the site certificate. The Council authorizes the Department to agree to
8 amendments to this plan and to mitigation actions that may be required under this plan. The
9 Department shall notify the Council of all amendments and mitigation actions, and the Council
10 retains the authority to approve, reject or modify any amendment of this plan or mitigation action
11 agreed to by the Department.

⁸ The certificate holder may establish a Technical Advisor Committee (TAC) but is not required to do so. If the certificate holder establishes a TAC, the TAC may offer comments to the Council about the results of the monitoring required under this plan.

Attachment 2: Annual Wildlife Monitoring Report (2024)

INTRODUCTION

The Site Certificate for Biglow Canyon Wind Farm (BCWF) (EFSC 2008B) requires mitigation and monitoring for facility impacts on wildlife and associated habitats. Three plans, incorporated by reference in the Site Certificate, describe the mitigation and monitoring requirements in detail. These include the Wildlife Monitoring and Mitigation Plan (Condition 61), Revegetation Plan (Condition 62), and Habitat Mitigation Plan (Condition 63). The following sections describe the 2024 activities conducted in accordance with the three plans and other Site Certificate wildlife-related requirements.

WILDLIFE MONITORING AND MITIGATION PLAN

The BCWF Wildlife Monitoring and Mitigation Plan describes wildlife monitoring that Portland General Electric (PGE) must conduct during operation of the facility, including: 1) avian and bat fatality monitoring; 2) raptor nesting surveys; 3) avian use and behavior surveys; and 4) wildlife incident response and handling (EFSC 2007). The bird and bat standardized fatality monitoring and avian use and behavior surveys were completed within the first two years after operations began for each phase, per requirements under the Site Certificate. Long-term raptor nest surveys are required every five years for the life of the facility and will be completed again in 2027. Details of the annual Wildlife Incident Response and Handling System for 2024 are reported below.

Wildlife Incident Response and Handling System

The Wildlife Incident Response and Handling System is a program for responding to and handling avian and bat injuries and fatalities found by personnel at the project site during construction and routine maintenance operations. PGE maintains an Oregon Department of Fish & Wildlife (ODFW) Scientific Take Permit (#051-24, Attachment A) and a U.S. Fish and Wildlife Service (USFWS) Migratory Bird Special Purpose Permit (MB# 47716B-3, Attachment B) to lawfully collect and handle protected birds and bats. In May 2020, PGE received its Biglow Canyon Long-term Eagle Incidental Take Permit (#MB63507B-0, Attachment C) from the USFWS. Consistent with permit requirements, PGE filed annual reports with ODFW and USFWS for bird and bat incidents reported in 2024 at BCWF. Additionally, BCWF site staff attended annual compliance training, which includes bird and bat handling instruction and eagle take permit compliance requirements.

One avian fatality was reported in 2024. A small passerine bird, possibly a sparrow or finch, was found incidentally by site staff in the BCWF office parking lot on Herin Lane. The incident was detailed in annual permit reports filed electronically with ODFW and USFWS, as required by each permit. Copies of the reports are available by contacting Lenna Cope (lenna.cope@pgn.com) or Kristi Boken (kristi.boken@pgn.com).

REVEGETATION PLAN

The BCWF Revegetation Plan describes methods and standards for revegetating areas temporarily disturbed during construction, maintenance, or repair of the facility (EFSC 2007). The objective is to restore temporarily disturbed areas to pre-construction condition or better. In