

# Frequently asked questions:

# Wildlife Directives for Alberta Renewable Energy Projects

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Who regulates the renewable energy industry?

The Alberta Utilities Commission (AUC) is the regulator for all electricity generators, including the wind and solar industries.

The AUC is an independent, quasi-judicial agency of the province of Alberta. The AUC, in its facilities mandate, regulates power plants to ensure they are sited, constructed, altered, operated and decommissioned in the public interest, considering the social, economic and environmental effects.

The information requirements for a wind or solar application are outlined in AUC Rule 007: Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments and in AUC Rule 012: Noise Control.

The roles of Alberta Environment and Parks (AEP) and the AUC with respect to renewable energy applications are defined on the AUC website.

Why are Alberta Environment and Parks wildlife biologists involved in the review of wind and solar energy facilities?

Wind and solar energy projects have both direct and indirect impacts on wildlife and wildlife habitat. These impacts can be categorized as:

- Direct mortality - facilities can directly cause mortalities to birds and bats, primarily by collisions or in the case of wind energy, barotrauma (barotrauma refers to injuries to bats caused by changes in air pressure).
- Habitat loss, degradation and fragmentation - development results in direct habitat alterations which can directly impact habitat quality and quantity.
- Disturbance - recent research has indicated that avoidance of renewable energy facilities by wildlife increases threats to at-risk wildlife populations.

For more detailed information please refer to the online directives.

What is the role of government wildlife

The directives focus on avoiding key wildlife habitat and standard mitigation (i.e., steps taken or tools used to reduce or avoid wildlife impacts) identified by AEP.

biologists in the review of wind and solar energy facilities?

The proponent will conduct desktop siting work and pre-application wildlife surveys to determine the potential risk of the proposed development to wildlife.

Avoidance and standard mitigation options are applied as necessary to reduce the risk of the development to wildlife and wildlife habitat.

As stated in AUC Rule 007, a Renewable Referral Report is required from AEP for any wind or solar energy applications. The wildlife biologist reviews that application and provides a referral report outlining how consistent the project proposal is to the appropriate directive. This letter must form part of the application to the AUC. If the applicant is unable to obtain a referral letter or cannot agree to a mitigation plan with the wildlife biologist, the application must include details explaining the situation.

What do the directives apply to?

The directives apply to all wind or solar energy project applications that fall under AUC Rule 007.

The directives guide the AEP review process.

Do the directives apply to any other industry?

No, the directives are specific to the wind and solar energy industry.

For wildlife guidelines, directives and processes that apply to other industrial activities please visit [alberta.ca](http://alberta.ca) or contact the local AEP Wildlife Office.

What is the difference between standards and best management practices?

Standards - provide siting, timing and site-related wildlife conservation requirements that must be met in the planning and development of a wind or solar energy facility. All standards in the directives are preceded by the number 100 (e.g., 100.1.4).

Best Management Practices (BMP) - provide information and considerations for the planning of wind or solar energy facilities to support better conservation and protection of wildlife and wildlife habitat. All BMPs in the directives are preceded by the number 200 (e.g., 200.3.8).

What if my project does not meet a standard as outlined in the directives?

The standards outlined in the directives must be adhered to unless there is a justified site-specific constraint that conflicts directly with the standard.

- In these cases, the applicant must identify the issue, justify the rationale and propose alternative mitigation to AEP.
- AEP will review this proposed deviation and determine if the rationale and alternative mitigation will meet the intent of the directives.
- The department will provide a response through the AEP Referral Report that is submitted as part of the application to the AUC. The AUC will assess the review by AEP and any comments provided by the applicant in its public interest assessment.

Projects that adhere to the standards outlined in the directives will move through the AEP review process quickly as there will be fewer delays to deal with the deviations.

Why are some wildlife standards different for the wind and solar energy industries compared to other industries in Alberta?

Wildlife standards are designed to mitigate the risk to specific wildlife species from a specific industry.

The standards outlined in the directives are based on the best available scientific research.

The standards outline what constitutes adequate avoidance or mitigation to reduce or limit the risk to wildlife from wind and solar energy facilities.

Is there a required submission template?

The Government of Alberta has developed a Renewable Energy Project Submission Template. The template is available at <https://open.alberta.ca/publications/renewable-energy-project-submission-template>.

All Renewable Energy Submissions must follow the submission template.

What about other environmental risks? Do the directives cover other AEP referral processes?

The AEP-Wildlife review is a separate process and does not replace the need for other AEP referrals. The focus of the directives is wildlife and wildlife habitat; all other issues will be addressed through other existing processes. The proponent needs to ensure they are compliant with these processes.

- For example, if a wetland is being disturbed the proponent would need to have approval under the AEP Alberta Wetland Policy.

Who in AEP do I contact about my wind project?

For all wildlife related renewable energy referrals please contact: [AEP.RenewableSSR@gov.ab.ca](mailto:AEP.RenewableSSR@gov.ab.ca)

The Government of Alberta has developed a new Post Construction Monitoring Protocol for Renewable Energy Projects. Does the new Survey Protocol apply to my project?

The new Post Construction Monitoring Survey Protocol was released in February 2020.

The Protocol must be followed for all post construction monitoring programs initiated after February 6, 2020 (<https://open.alberta.ca/publications/post-construction-survey-protocols-for-wind-and-solar-energy-projects>).

Projects that have started post construction monitoring fieldwork prior to January 10, 2020 should contact AEP to determine if changes to their post construction monitoring program are necessary.

Does the new Government of Alberta Bird

The new Bird Migration Survey Protocol was posted online in February 2020.

The Protocol must be followed for all new/updated bird migration surveys for which an AEP Renewable Referral Report is required.

Migration Survey Protocol apply to my project?

All bird migration survey work initiated after February 6, 2020 must follow the methods outlined in this Protocols (<https://open.alberta.ca/publications/bird-migration-survey-protocol>).

Projects that have completed their fall migratory bird surveys in 2019, but still have outstanding spring surveys to complete, must complete those surveys in accordance with the new protocol.

I have an AEP-WM Renewable Energy Referral Report but I am making a change to my project. Do I need an Amendment Letter from AEP-WM?

An Amendment letter from AEP is required if:

- The Proponent is proposing changes to the mitigation commitments outlined in the AEP Renewable Energy Referral Report
- The Proponent is proposing changes to project siting/layout that increases impacts to sensitive wildlife habitat (ex. native habitat)
- The Proponent is proposing to project siting/layout that increases infringements on wildlife features (e.g. wetlands, raptor nests, sharp-tail grouse leks, etc.)
- The Proponent is proposing to wind turbine model that lead to changes in rotor swept area.

What defines a high mortality event and when do I need to report a high mortality event?

A high mortality event is an abnormal event resulting in high levels or higher levels of wildlife mortality than typically recorded at a renewable energy facility.

For the renewable energy projects, unless otherwise defined by the regulator, a high mortality event is deemed to have occurred when:

- there is a mortality of one or more species with a legislative status of Endangered or Threatened under the Alberta *Wildlife Act* or the federal Species at Risk Act, or
- when mortalities are identified during a single event or within 7 days that are two times the average number of mortalities identified during the project's final year of Post Construction Monitoring Plan (i.e. 2 times # of bird mortalities/turbine/year for the facility).

For bat mortality rankings, please refer to the [Bat Mitigation Framework](https://open.alberta.ca/publications/bat-mitigation-framework-for-wind-power-development) (<https://open.alberta.ca/publications/bat-mitigation-framework-for-wind-power-development>).

Do I need a specific Wildlife Research Permit and Collection Licence to conduct pre or post construction wildlife surveys?

Wildlife Research Permits and Collection Licences are required when conducting specific wildlife surveys.

Some of the wildlife survey work that is required under the Government of Alberta Directive will require you to have a valid Wildlife Research Permit and Collection Licence. However, you do not need a project-specific Wildlife Research Permit and Collection Licence.

For more information on Wildlife Research Permits and Collection Licences, please refer to <https://www.alberta.ca/wildlife-research-and-collection.aspx>.