

BY ELECTRONIC FILING

April 16, 2020

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Mail Code: DHAC, PJ-12
888 First Street, N.E.
Washington, D.C. 20426

**RE: Priest Rapids Hydroelectric Project No. 2114-182 License Compliance Filing
Article 414 - 2020 Bald Eagle Perch/Roosting Protection Plan annual report**

Dear Secretary Bose,

Public Utility District No. 2 of Grant County, Washington (Grant PUD) respectfully submits to the Federal Energy Regulatory Commission (FERC) its 2020 Bald Eagle Perch/Roosting Protection Plan (Plan) Annual Report pursuant to License Article 414 of the Priest Rapids Project No. 2114 (Project)¹. Activities related to the Bald Eagle Perch/Roost Protection Plan were implemented in coordination with other plans required by the license for the Project during the 2019 reporting period (March 16, 2019–March 15, 2020). This includes the Wildlife Habitat Management Plan (Article 409); Wildlife Habitat Monitoring and Information and Education Plan (Article 410); Transmission Line Avian Collision Protection Plan (Article 411); Rare, Threatened, and Endangered Plant Monitoring Plan (Article 413); Programmatic Agreement and the provisions of the Historic Properties Management Plan (Article 416); the Memorandum of Agreement between Grant PUD and the Wanapum (Article 417); Priest Rapids Recreation Resource Management Plan (Article 418); and the Shoreline Management Plan (Article 419).

On April 10, 2009, Grant PUD filed its Bald Eagle Perch/Roosting Protection Plan (Plan) with FERC. FERC issued an Order on January 19, 2010 approving the Plan pursuant to Article 414 of the Priest Rapids Project². Per FERC's approval of the Plan, Grant PUD is required to provide annual reports to the U.S. Fish and Wildlife Service (USFWS), Washington Department of Fish and Wildlife (WDFW), the Wanapum and FERC by April 30 of each year.

Grant PUD is reporting its progress on the implementation activities related to this plan for the period from March 16, 2019 to March 15, 2020. The 2020 annual report presents results from daytime eagle-use surveys, communal roost site surveys, nest occupancy and productivity surveys, perch/roost tree protection efforts, and provides an update on riparian planting efforts.

¹ 123 FERC ¶ 61,049 (2008).

² 130 FERC ¶ 62,054 (2010).

Bose (LA 414 Compliance filing)
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Consistent with the License and modifying and approving Order, the enclosed document has been provided to the USFWS, WDFW and the Wanapum.

FERC staff with questions or comments, please contact Tom Dresser, Grant PUD Fish, Wildlife and Water Quality Manager, at 509-754-5088, ext. 2312.

Respectfully,

Ross Hendrick

Ross Hendrick
Senior Manager - Environmental Affairs

Cc: Jeff Krupka – USFWS
Steve Lewis – USFWS
Patrick Verhey – WDFW
Alyssa Buck - Wanapum

**Priest Rapids Hydroelectric Project No. 2114
2020 Annual Report for the Bald Eagle Perch/Roost Protection Plan
Pursuant FERC Article 414**

Joe LeMoine
Senior Biologist
Public Utility District No. 2 of Grant County, Washington
P.O. Box 878
Ephrata, WA 98823

April 2020

Executive Summary

On January 19, 2010, the Federal Energy Regulatory Commission (FERC) approved the Bald Eagle (*Haliaeetus leucocephalus*) Perch/Roost Protection Plan pursuant to Article 414 of the license for the Priest Rapids Hydroelectric Project No. 2114 (Project). Within this 2020 annual report, the Public Utility District No. 2 of Grant County, WA (Grant PUD) is reporting its progress on the implementation activities related to this plan for the period from March 16, 2019 to March 15, 2020. The 2020 annual report presents results from daytime eagle-use surveys, communal roost site surveys, nest occupancy and productivity surveys, perch/roost tree protection efforts, and provides an update on riparian planting efforts.

A total of 199 eagle observations were made during the project-wide surveys, distributed throughout the Project (Table 1). The survey on January 29, 2020 yielded the single greatest Project-wide survey count of 74 total eagles.

Three existing bald eagle nests were monitored during the 2020 reporting year. The Cove nest successfully produced twins that fledged on July 8, 2019. Both the Goose Island nest and A-6 nest had documented nesting activity early in the season, but due to foliage obstruction staff was unable to determine if viable offspring were produced.

A total of four communal roosting site surveys were conducted during the 2020 reporting period that documented five communal roosting locations. The communal roost site with the greatest eagle use was at Scammon Landing, where seven eagles were documented. The other communal roost areas were located on West Bar within the Wanapum Reservoir, near the Priest Rapids Boat Basin, south of lake Geneva and at the mouth of Crab Creek within the Priest Rapids Reservoir (Table 3).

Grant PUD installed 250 additional perch tree plantings at Airstrip and West Bar in the 2020 reporting period. Grant PUD also monitored and maintained perch tree plantings at ten sites throughout the Project: Airstrip, Apricot Orchard, Columbia Cliffs, Rattlesnake Cove, Frenchman Coulee, Rocky Coulee, Vantage, Sand Hollow, Buckshot and Priest Rapids Recreation Area. Grant PUD is continuing to monitor and maintain these plantings throughout the 2021 reporting period and will continue to look for opportunities for additional plantings.

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1.0 Introduction

On January 19, 2010, the Federal Energy Regulatory Commission (FERC) approved the Bald Eagle (*Haliaeetus leucocephalus*) Perch/Roost Protection Plan pursuant to License Article 414 for the Priest Rapids Project No. 2114 (Project)¹. FERC's approval of Article 414 requires the Public Utility District No. 2 of Grant County, Washington (Grant PUD) to file an annual progress report to FERC, the United States Fish and Wildlife Service (USFWS), and the Washington Department of Fish and Wildlife (WDFW), and that the annual report shall cover the dates of March 16 through March 15 of the following year.

Activities related to the Bald Eagle Perch/Roost Protection Plan were implemented in coordination with other plans required by the license for the Project during the 2020 reporting period (March 16, 2019–March 15, 2020). This includes the Wildlife Habitat Management Plan (Article 409); Wildlife Habitat Monitoring and Information and Education Plan (Article 410); Transmission Line Avian Collision Protection Plan (Article 411); Rare, Threatened, and Endangered Plant Monitoring Plan (Article 413); Programmatic Agreement (Article 416); the Memorandum of Agreement between Grant PUD and the Wanapum (Article 417); Priest Rapids Recreation Resource Management Plan (Article 418); the Shoreline Management Plan (Article 419); and the provisions of the Historic Properties Management Plan.

2.0 Materials and Methods

The following sections depict the materials and methods used during the 2020 reporting year for eagle-use surveys.

2.1 Eagle Surveys

From 2010 through 2016, Grant PUD conducted 11 perch and roosting tree surveys (three summer/eight winter). From these six seasons, Grant PUD documented an annual average population of 347 eagles within the Project boundaries (LeMoine 2017). In summer of 2016, Grant PUD, USFWS, and WDFW agreed to reduce the number of day-use surveys within the Project from 11 to four. Appendix B provides an explanation and consultation record of this change.

For the 2020 reporting period, Grant PUD conducted four daytime use surveys during the peak occupancy timeframe of November 15 through March 15. Four communal roosting tree surveys were conducted in this timeframe as well. Additionally, Grant PUD conducted nest occupancy surveys throughout the season that documented all activity and life stages from incubation to fledging.

2.1.1 Day-Use Surveys

A total of four daytime eagle-use surveys were conducted within the Project to document areas of eagle use (Table 1). These surveys were boat-based and each survey was composed of a single and complete pass of Wanapum and Priest Rapids reservoirs. All four day-use surveys were conducted during the winter migration period (November 15 - March 15). Eagle-use surveys recorded the date, weather conditions, surveyors, specific reservoir (i.e. Wanapum or Priest Rapids), survey start time, and survey end time. Additionally, each eagle observation had the following data recorded:

¹ 130 FERC ¶ 62,054 (2010)

- 1). observation time;
- 2). number observed;
- 3). species (i.e., bald, golden, unknown);
- 4). maturity (i.e., mature, juvenile, unknown);
- 5). Geographic Positioning System (GPS) point (NAD 84, Decimal Degrees);
- 6). location description;
- 7). perch structure/soaring (i.e., on ground, perch pole, tree, rock, cliff, soaring,); and
- 8). observation notes.

Eagle species were identified as bald, golden, or unknown. Eagle maturity status was identified as either: mature, juvenile, or unknown. Bald eagles exhibiting a white head and tail were classified as mature. Juvenile bald eagles were classified by variable amounts of white on their belly, back, and wings. Golden eagles (*Aquila chrysaetos*) exhibiting a solid brown body, black tail, and golden feathering on their nape and upperwing coverts were classified as mature. Juvenile golden eagles were classified by a dark body with white bases on their outer secondary feathers and inner primary feathers with a tail that might be white with a thick or black terminal band (Alsop 2001).

2.1.2 Communal Roost Site Survey

Grant PUD conducted four eagle communal roost surveys during the 2020 reporting period. Communal roost site surveys were initiated 30 minutes before sunset or at dawn before the eagles have left the roost in the morning. Communal roost sites are defined as trees with three or more eagles perched in them. Trees that were classified as communal roost sites had the following data recorded: date, observation time, count of eagles, species, GPS point, location description, and a date/time stamped photograph when possible.

2.1.3 Nest Surveys

Eagle nest surveys of known nests were performed to monitor nest occupancy, activity, and productivity in a manner consistent with WDFW protocols. In general, the methodologies for eagle nest surveys are as follows:

- 1). Nest occupancy surveys were conducted during the last week of February through mid-March in good weather;
- 2). A minimum of three hours were spent at each known nest site in the morning hours unless eagle occupancy was established at arrival;
- 3). If eagle occupancy was established at arrival, the information was recorded, and the surveyor vacated the area to avoid disturbing the nesting pair of eagles; and
- 4). If nest occupancy was not determined on the first survey, a second nest occupancy survey was conducted.

In addition, any evidence of new nesting activity will be documented and monitored as per the occupancy protocols above.

2.2 Eagle Perch, Roost, and Nest Tree Protection Efforts

Grant PUD implemented measures to protect eagle perch, roost, and nesting trees through wire exclusion and site management plans. Eagle roost and nest trees are wrapped with exclusion wire to protect the trees from beaver damage. The installation of exclusion wire on eagle day-use perch trees is prioritized according to nearby beaver activity, nearby nesting eagles, the tree species, or the trees that are identified as communal roost trees. As part of managing and

supporting eagles that nest within or adjacent to the Project, Grant PUD maintains multiple perch, roost, and nesting structures located throughout the Project. Grant PUD also has licensed nuisance wildlife control officers (NWCO) on staff that assist with the removal of problem beavers throughout the Project that pose a threat to perch, roost and nesting trees.

2.3 Riparian Plantings

Throughout the 2020 reporting period, Grant PUD planted and/or maintained a significant number of black cottonwood (*Populus trichocarpa*) and ponderosa pine (*Pinus ponderosa*) in an effort to establish additional eagle perch trees throughout the Project. Ponderosa pine was planted as an established potted plant, while black cottonwood was planted in both potted and stake varieties. Grant PUD continues to explore additional planting locations that will be compatible with Memorandum of Agreement between Grant PUD and the Wanapum (Article 417) and the provisions of the Historic Properties Management Plan.

3.0 Results and Discussion

The following sections detail the results from the 2020 reporting year.

3.1 Eagle Surveys

Grant PUD conducted daytime eagle-use surveys, communal roost tree surveys, and nest surveys from March 16, 2019 to March 15, 2020 (Table 1).

3.1.1 Day-Use Surveys

Grant PUD performed four Project-wide, day-use eagle surveys between November 15, 2019 and March 15, 2020. A total of 199 eagles were observed during the four surveys (Table 1). A total of 186 eagles were identified as bald eagles, while the remaining 13 were documented as golden eagles. The surveys on January 29, 2020 yielded the greatest Project-wide survey count of 74 eagles. The lowest project-wide survey counts recorded were on March 10, 2020 when 25 eagles were observed. Table 2 provides a year-to-year comparison of day-use survey results across the annual monitoring periods following licensing in 2008.

Table 1 The Priest Rapids Project eagle survey counts conducted for November 15, 2019 – March 16, 2020.

Reservoir	Date	Bald Eagles		Golden Eagles		Reservoir Sum	Survey Sum
		Mature	Juvenile	Mature	Juvenile		
Priest Rapids	1/9/2020	8	13	1	0	22	59
Wanapum		22	12	3	0	37	
Priest Rapids	1/29/2020	13	20	0	0	33	74
Wanapum		18	21	2	0	41	
Priest Rapids	2/26/2020	6	6	2	1	15	41
Wanapum		17	8	1	0	26	
Priest Rapids	3/10/2020	7	4	0	0	11	25
Wanapum		6	5	2	1	14	
Column Totals		97	89	11	2	199	199
Notes:							
*Wanapum Reservoir had 118 documented observations; Priest Rapids Pool had 81 documented observations.							

Table 2 The Priest Rapids Project annual eagle survey results from 2009 – 2020.

Reservoir	Date	Bald Eagles		Golden Eagles		Unknown	Reservoir Sum	Survey Sum
		Mature	Juvenile	Mature	Juvenile			
Priest Rapids	2009-2010 ¹	15	8	4	3	3	33	81
Wanapum		19	24	2	2	0	48	
Priest Rapids	2010-2011	44	51	16	3	0	116	361
Wanapum		118	95	29	3	0	245	
Priest Rapids	2011-2012	54	77	2	1	0	134	374
Wanapum		102	118	13	5	2	240	
Priest Rapids	2012-2013	29	70	1	0	0	100	318
Wanapum		82	133	2	1	0	218	
Priest Rapids	2013-2014	60	45	3	2	0	110	292
Wanapum		84	74	19	5	0	182	
Priest Rapids	2014-2015	63	90	0	0	0	153	365
Wanapum		96	95	20	1	0	212	
Priest Rapids	2015-2016	63	53	3	0	0	119	374
Wanapum		129	106	19	1	0	255	
Priest Rapids	2016-2017 ²	30	49	4	0	0	83	221
Wanapum		72	54	9	3	0	138	
Priest Rapids	2017-2018 ²	26	46	3	1	0	76	193
Wanapum		60	46	5	6	0	117	
Priest Rapids	2018-2019 ²	44	67	3	1	0	115	214
Wanapum		44	49	5	1	0	99	
Priest Rapids	2019-2020 ²	34	43	3	1	0	81	199
Wanapum		63	46	8	1	0	118	
Annual Averages 2011-2016	PRD	52	64	4	1	0	122	347
	WAN	102	104	17	3	1	225	
Annual Averages 2017-2020	PRD	34	51	3	1	0	89	207
	WAN	60	49	7	3	0	118	

Notes:

¹Eagle Surveys reported in 2010 were based on surveys made two days (February 25, 2010 and March 4, 2010), and are not included in averages. Survey protocols modified following 2009-2010 period to 11 surveys.

²Eagle surveys reported in the 2017 through 2020 seasons were based on four surveys and have a separate average column. Survey requirements were amended following the 2016 reporting period to 4 winter surveys.

3.1.2 Communal Roost Surveys

A total of four communal roost surveys were conducted for the 2020 report period during the peak of eagle use (Table 3). A total of five communal roost locations were documented in 2020.

Scammon Landing continues to be the most used roosting location with seven eagles documented on the January 7, 2020 survey.

Table 3 2020 Communal Roost Survey Results

Date	Priest Rapids/ Wanapum Pool	GPS Northing	GPS Westing	Eagle (n)	Golden/ Bald	Notes
1/7/2020	Wanapum	47.0399	-120.0238	7	Bald	Scammon landing
1/8/2020	Priest	46.6499	-119.9354	4	Bald	North of Priest Boat Basin
1/14/2020	Wanapum	47.1127	-120.0222	4	Bald	West Bar
2/18/2020	Priest	46.7024	-119.9519	5	Bald	South of Geneva
2/18/2020	Priest	46.8165	-119.9222	4	Bald	Mouth of Crab Creek

3.1.3 Nest Survey Results

Three previously documented bald eagle nests, identified as WDFW Bald Eagle Nest Territory 1703 (Wanapum Pool Right Bank/Johnson Creek/Getty’s Cove (The Cove)), Bald Eagle Nest Territory 1820 (Priest Rapids Pool/Goose Island) and the A-6 nest (Wanapum Pool Right Bank, opposite Apricot Orchard Boat Launch) were monitored during the 2020 reporting period.

On May 14, 2019 Grant PUD staff documented a set of twins in The Cove nest (Figure 1). On July 3, 2019 the twins were seen perched on branches outside of the nest (Figure 2). On July 8, 2019 both twins had fledged and left the nest. This is the second time The Cove nest has documented the successful fledging of twins. It is also the eighth successful year out of the last nine (2010-2019) for The Cove nest. The nest was checked again in early March of 2020, and the nest is again occupied with incubation behavior observed. Monitoring results for the 2020 nesting season will be presented in the 2021 annual report.

The nests within WDFW Bald Eagle Nest Territory 1820 were Nest 1 (1820-1) for 2010, Nest 2 (1820-2) for 2011, and Nest 3 (1820-3) for 2012. Nest 1820-1 was unsuccessful in 2010, and the top of the nest tree broke off in January 2011 which ultimately destroyed Nest 1820-1. Nest 1820-2 was first documented on March 3, 2011, and the nest was not successful in 2011. In 2012, the eagles built Nest 1820-3; however, the eagles continued to nest in Nest 1820-2. The productivity of the Nest 1820-2 was unknown in 2012. Adults were seen incubating in March 2013 and 2014 on Nest 1820-3, but nest success was unknown due to nest location and tree foliage limiting observations. Nest 1820-3 was successful in 2016 with a documented fledging observed soaring over Goose Island. In 2017, Grant PUD staff observed an eagle incubating in Nest 1820-3 on multiple occasions. Subsequent surveys conducted in May and June documented at least one adult eagle perched in the nesting tree each survey, but thick foliage made it impossible to determine if a successful fledgling was produced. Spring nesting surveys in 2018 documented that eagles had constructed a new nest in a cluster of trees to the southeast of the previous nests. Incubating behavior was documented throughout March and most of April, however, the nest was documented as vacant on multiple surveys conducted in June of 2018 and subsequently deemed unoccupied. In March of 2019, incubating behavior was documented in nest 1820-3 again, however, subsequent surveys were unable to document behavior due to foliage obstruction.

Another nest site is located just north and east of Crescent Bar in a ponderosa pine tree above a basalt cliff face on the right bank of the Columbia River. The basalt cliff is referred to locally as the A-6 wall, so Grant PUD staff is referring to the nest at this location as the A-6 nest. The A-6 nest was successful in 2015. It was once again successful in 2016 producing a juvenile bald eagle that fledged on June 30, 2016. Surveys conducted in 2017 documented at least one adult in the nesting tree on each visit, but Grant PUD staff was unable to see if a fledgling was successfully produced. Multiple nesting surveys in spring of 2018 documented adult bald eagles using the tree for perching or were soaring in the area, but no incubating behavior was recorded. Surveys conducted in March and April of 2019 documented eagles perched in the nesting tree but crews were unable to definitively document incubating behavior.



Figure 1 Bald eagle twins in The Cove nest.



Figure 2 The Cove nest twins a week before fledging.

3.2 Eagle Perch Tree, Roost Tree, and Nest Protection Efforts

Grant PUD proactively and aggressively wrapped trees during the 2010-2012 reporting periods and did not discover a need for additional tree wrapping during the 2020 reporting period, however, additional surveys will be conducted during the summer of 2020 to assess the need for repairs to existing wraps and/or wrap new trees. Grant PUD staff operated as a certified NWCO to remove problem beavers at select locations within the Project during the 2020 reporting period and has plans to continue throughout the 2021 reporting period.

3.3 Riparian Plantings

Grant PUD planted and/or maintained a number of ponderosa pine and black cottonwood throughout the Project. Approximately 250 new perch tree plantings were installed in 2019. 150 plantings were installed at Airstrip and 100 were installed at West Bar. In addition to the new plantings, Grant PUD maintained/replanted perch trees at ten existing locations throughout the Project: Airstrip, Apricot Orchard, Columbia Cliffs, Rattlesnake Cove, Frenchman Coulee, Rocky Coulee, Vantage, Sand Hollow, Buckshot and Priest Rapids Recreation Area.

Grant PUD will continue to monitor and maintain existing perch tree plantings throughout 2020, as well as explore additional opportunities for future perch tree plantings. An update on this activity will be provided in the 2021 report.

4.0 Summary

The numbers of bald eagles using the Project have increased steadily over the last decade. The 2020 reporting season documented 199 eagles during day use surveys, which is a slight decrease from 214 found in 2019 but more than the 193 found in 2018. Golden eagles continue to be present in the Project, but not in large numbers.

The 2020 reporting period documented nesting success at The Cove nest, which produced twin fledglings on July 8, 2019. The Goose Island nest had documented nesting activity early in the season but success is unknown due to foliage obstruction. The A-6 nest had eagles perched in the tree and documented near the nest, however, it is unknown if it was successful because crews were unable to definitively see into the nest. Grant PUD plans to continue monitoring all nesting sites within the Project through 2019. In addition, Grant PUD will follow federal guidelines as they pertain to managing grounds around nesting sites until juveniles have fledged.

Grant PUD installed a number of perch tree plantings at Airstrip and West Bar. These plantings will be closely monitored and maintained throughout 2020. Grant PUD will continue to monitor and maintain previous plantings found at nine additional sites throughout the Project. Future tree protection efforts are planned to be directed in response to beaver activity at known areas of eagle use. Grant PUD will continue to collaborate with the Wanapum and Cultural Resources Department in the selection of future planting areas and methodologies.

List of Literature

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- Western Forestry and Conservation Association (WFCA). 2010. Restoration of Disturbed Sites with Native Plants: An Integrated Approach. June 14–17, 2010. Wenatchee, WA.

Appendix A
Bald Eagle Nest Locations

Bald Eagle Territory #1703
Wanapum Pool Right Bank



Nest #	Zapped	Nest Description
1703-2	No	Bald Eagle Nest at The Cove LAT 46.8803LONG -119.9927 Legal Description: T16-ON R23-OE S18

Bald Eagle Territory #1820
Priest Rapids Pool – Goose Island

0-2



Nest #	Zapped	Nest Description
1820-2	No	Bald Eagle Nests on Priest Pool – Goose Island LAT 46.6622LONG -119.9912 Legal Description: T14-ON R23-OE S34
1820-3	No	

Bald Eagle Nest A-6
Wanapum Pool



Nest #	Nest Description
A-6	Lat 47.2250 Long -120.0829

Appendix B
Email Confirmation of Management Plan Changes

From: [Lewis, Stephen](#)
To: [Patrick Verhey](#)
Cc: [Joseph LeMoine](#); [John Monahan](#); [Deanne Pavlik-Kunkel](#)
Subject: [possible spam] Re: Proposed changes to eagle management
Date: Friday, August 12, 2016 4:17:47 PM
Attachments: [image001.png](#)

USFWS approves as well. S-

On Wed, Aug 10, 2016 at 3:05 PM, Verhey, Patrick M (DFW)

<Patrick.Verhey@dfw.wa.gov> wrote: Joe,

WDFW approves.



Patrick Verhey

Renewable Energy Biologist WDFW

Habitat Program Renewable Energy

Section 1550 Alder St N.W.

Ephrata, WA 98823

(509) 754-4624 ex. 213

Patrick.Verhey@dfw.wa.gov

Work schedule is M-Th

From: Joseph LeMoine [mailto:JleMoine@gcpud.org]
Sent: Wednesday, August 10, 2016 11:29 AM
To: Verhey, Patrick M (DFW); Steve Lewis (Stephen.Lewis@fws.gov)
Cc: John Monahan; Deanne Pavlik-Kunkel
Subject: Proposed changes to eagle management

Hello Patrick and Steve,

I apologize for getting a synopsis of our proposed changes to the Bald Eagle Perch/Roosting Protection Plan to you a little tardy, but my son did not keep his due date and decided to come early. I know we discussed a number of ideas and wanted to give you a clean copy to go over to see if we are still in agreement.

Over the past seven seasons Grant PUD has documented an annual average population of 347 eagles within the Project boundaries. Eagle observations have come from 11 perch and roosting tree surveys (3 summer/8 winter). Grant PUD proposes to stop conducting the 3 summer surveys and reduce the 8 winter surveys to 4.

1. Summer surveys only identify resident eagles (often fledglings) and rarely find more than a few eagles Project wide.
2. Reducing winter surveys to 4 would allow for the monitoring of eagle usage over the peak occupancy period of December through March.
 - The data from these surveys would still be compatible with previous years. We would be able to compare everything as before with the only difference being a 4 survey total rather than an 8 survey total.
 - This would allow for a much safer work environment because optimal days would be selected rather than whatever the conditions may be when you have crew availability.
 - Reducing the number of surveys would allow for the allocation of staff and resources to go to future vegetation plantings (scheduled this fall), exclusion wire efforts, and nest occupancy and success surveys.

There are now 3 active nests within the Project that we monitor with the addition of the A6 nest. There is also a likelihood that there will be more nests within the Project in the years to come as the population of eagles statewide has increased significantly. With this in mind, Grant PUD proposes that all nests Project wide be managed in accordance with the USFWS national bald eagle management guidelines and that no further individual nest management plans be created or renewed.

Grant PUD is not looking to decrease the amount of effort that goes into managing eagles, rather we are looking to shift staff and resources to into something that makes sense for eagles and everyone involved. I feel that that the last seven years of surveying under the current methods has provided us with enough data that we can now make some adjustments. If we are able to focus our surveying efforts on the peak usage portion of the year and enforce a standard nest management approach, it will not only continue to provide protection and adequate data that is compatible with previous years, but also allow for

increased plantings, predator control, nest occupancy and nest success surveys to be conducted.

With your approval via email, we will proceed with implementing these changes immediately and document program modifications in an updated Bald Eagle Management Plan to be completed before the end of this year and in the Annual Report that will be submitted to FERC. I look forward to continue to collaborate on management decisions as we move forward and am more than happy to answer any questions or concerns you may have.

Joe LeMoine FWWQ

Biologist

509-764-0500 Ext: 2690

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***** Stephen T. Lewis

Hydropower and Energy Coordinator US FISH
AND WILDLIFE SERVICE

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"If a road has no obstacles, it probably doesn't lead to anywhere." S. Lewis