

**BY ELECTRONIC FILING**

April 20, 2023

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 - 2023 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 2023 Bald Eagle Perch/Roosting Protection Plan (Plan) Annual Report pursuant to License Article 414 of the Priest Rapids Project No. 2114 (Project)<sup>1</sup>. 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 2022-2023 reporting period. These plans 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 Project<sup>2</sup>. 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, 2022 to March 16, 2023. The 2023 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.

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<sup>1</sup> 123 FERC ¶ 61,049 (2008).

<sup>2</sup> 130 FERC ¶ 62,054 (2010).

A total of 205 eagle observations, distributed throughout the Project, were made during the project-wide surveys. The survey on January 24, 2023, yielded the single greatest project-wide survey count of 63 total eagles.

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,



Shannon Lowry  
License Compliance and Lands Services Manager

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

**Priest Rapids Hydroelectric Project No. 2114  
2023 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 2023**

## 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 2023 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, 2022, to March 15, 2023. The 2023 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 205 eagle observations, distributed throughout the Project, were made during the project-wide surveys (Table 1). The survey on January 24, 2023, yielded the single greatest project-wide survey count of 63 total eagles.

A new bald eagle nest was found just south of Sentinel Gap on the Priest Rapids reservoir that successfully produced twins. The nests located at Goose Island and A-6 were also successful in producing a single juvenile at each site. The Cove and Girl Scout Island nests were active in early April with incubating behavior documented in both, however, were determined to have been abandoned following a storm that came through the region on April 14, 2022 that deposited over a foot of snow.

A total of four communal roosting site surveys were conducted during the 2022 reporting period that documented four communal roosting locations. The communal roost site with the greatest eagle use on the Wanapum reservoir was at Quilomene Bay, where seven eagles were documented. The site with the highest use on the Priest Rapids reservoir was Goose Island, where six eagles were documented. Other communal roost areas were located at Sand Hollow, just south of the I-90 bridge, on the Wanapum reservoir and at Sentinel Gap on the Priest reservoir.

Grant PUD installed remote irrigation systems to help establish the 250 perch tree plantings that were planted at Airstrip, West Bar, and Crescent Bar. Grant PUD also monitored and maintained perch tree plantings at 10 additional sites throughout the Project: Crescent Bar, 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 2024 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)<sup>1</sup>. 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 2023 reporting period (March 16, 2022–March 15, 2023). 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 (Article 416).

## 2.0 Materials and Methods

The following sections depict the materials and methods used during the 2023 reporting year for eagle-use surveys.

### 2.1 Eagle Surveys

From 2010 through 2016, Grant PUD conducted eleven 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 eleven to four. Appendix B provides an explanation and consultation record of this change.

For the 2023 reporting period, Grant PUD conducted four daytime use surveys during the peak occupancy period of November 15 through March 15. Four communal roosting tree surveys were conducted in this period 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). observation time

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<sup>1</sup> 130 FERC ¶ 62,054 (2010)

- 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,)
- 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 2023 reporting period. Communal roost site surveys were initiated 30 minutes before sunset or at dawn before the eagles 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 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 who assist with removal of problem beavers throughout the Project that pose a threat to perch, roost, and nesting trees.

### **2.3 Riparian Plantings**

Throughout the 2023 reporting period, Grant PUD planted and/or maintained a considerable 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 the 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 2023 reporting year.

#### **3.1 Eagle Surveys**

Grant PUD conducted daytime eagle-use surveys, communal roost tree surveys, and nest surveys from March 16, 2022, to March 15, 2023.

##### **3.1.1 Day-Use Surveys**

Grant PUD performed four Project-wide, day-use eagle surveys between November 15, 2022, and March 15, 2023. A total of 205 eagles were observed during the four surveys (Table 1). A total of 190 eagles were identified as bald eagles, while the remaining fifteen were documented as golden eagles. The survey on January 24, 2023, yielded the greatest Project-wide survey count of 63 eagles. The lowest project-wide survey counts recorded were on March 2 and 6, 2023, when 42 eagles were recorded in each survey. Table 2 provides a year-to-year comparison of day-use survey results after survey protocol was changed prior to the 2017 season. Table 3 provides historic data from 2010-2016 when Grant PUD conducted eleven surveys annually (three summer and eight winter). Figure 1 shows the distribution of eagles observed in the 2023 season.



**2022-2023 EAGLE USE OBSERVATIONS  
WITHIN THE PRIEST RAPIDS PROJECT**

This map/data was created for informational, planning, reference and guidance purposes only. Grant PUD makes no warranty, expressed or implied related to the accuracy or content of these materials. NR GIS - 2023



**Figure 1 Day use survey results for the 2023 reporting season.**

**Table 1 The Priest Rapids Project eagle survey counts conducted for November 15, 2022 – March 16, 2023.**

Reservoir	Date	Bald Eagles		Golden Eagles		Reservoir Sum	Survey Sum
		Mature	Juvenile	Mature	Juvenile		
Priest Rapids	1/24/2023	9	13	2	1	25	63
Wanapum		17	19	0	2	38	
Priest Rapids	2/14/2023	12	16	0	0	28	58
Wanapum		11	15	3	1	30	
Priest Rapids	3/2/2023	9	7	1	1	18	42
Wanapum		13	9	2	0	24	
Priest Rapids	3/6/2023	14	8	0	0	22	42
Wanapum		12	6	1	1	20	
Column Totals		97	93	9	6		205
Notes:							
*Wanapum Reservoir had 112 documented observations; Priest Rapids Pool had 93 documented observations.							

**Table 2 The Priest Rapids Project annual eagle survey results from 2017-2023.**

Reservoir	Date	Bald Eagles		Golden Eagles		Reservoir Sum	Survey Sum
		Mature	Juvenile	Mature	Juvenile		
Priest Rapids	2016-2017	30	49	4	0	83	221
Wanapum		72	54	9	3	138	
Priest Rapids	2017-2018	26	46	3	1	76	193
Wanapum		60	46	5	6	117	
Priest Rapids	2018-2019	44	67	3	1	115	214
Wanapum		44	49	5	1	99	
Priest Rapids	2019-2020	34	43	3	1	81	199
Wanapum		63	46	8	1	118	
Priest Rapids	2020-2021	37	43	4	0	84	198
Wanapum		67	36	9	2	114	
Priest Rapids	2021-2022	52	64	4	2	122	308
Wanapum		108	66	9	3	186	
Priest Rapids	2022-2023	44	44	3	2	93	205
Wanapum		53	49	6	4	112	
Annual Averages 2017-2023	PRD	38	51	3	1	93	220
	WAN	67	49	7	3	126	
Eagle surveys reported in the 2017 through 2023 seasons are based on four surveys. Survey requirements were amended following the 2016 reporting period to four winter surveys.							

**Table 3 2010-2016 annual survey results based on prior 11 survey protocol.**

Reservoir	Date	Bald Eagles		Golden Eagles		Unknown	Reservoir Sum	Survey Sum
		Mature	Juvenile	Mature	Juvenile			
Priest Rapids	2009-2010 <sup>1</sup>	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	
Annual Averages 2011-2016	PRD	52	64	4	1	0	122	347
	WAN	102	104	17	3	1	225	

Eagle Surveys reported in 2010 were based on surveys conducted over two days (February 25<sup>th</sup> and March 4, 2010) and are not included in averages. Surveys from 2011-2016 reflect a previous protocol of 11 surveys.

### 3.1.2 Communal Roost Surveys

A total of four communal roost surveys were conducted for the 2023 report period during the peak of eagle use (Table 4). A total of four communal roost locations were documented in 2023. Quilomene Bay was the most used roosting location on the Wanapum reservoir with seven eagles documented on February 14, 2023. Goose Island had the highest documented usage on the Priest reservoir with six eagles witnessed on January 17, 2023.

**Table 4 2022 Communal Roost Survey Results**

Date	Priest Rapids/ Wanapum Pool	GPS Northing	GPS Westing	Eagle (n)	Golden/Bald	Notes
1/17/2023	Priest	46.6623	-119.9213	6	Bald	Goose Island
1/24/2023	Wanapum	46.9221	-119.9544	4	Bald	Sand Hollow
2/8/2023	Priest	46.7809	-119.9324	5	Bald	Sentinel Gap
2/14/2023	Wanapum	47.1127	-120.0232	7	Bald	Quilomene Bay

### 3.1.3 Nest Survey Results

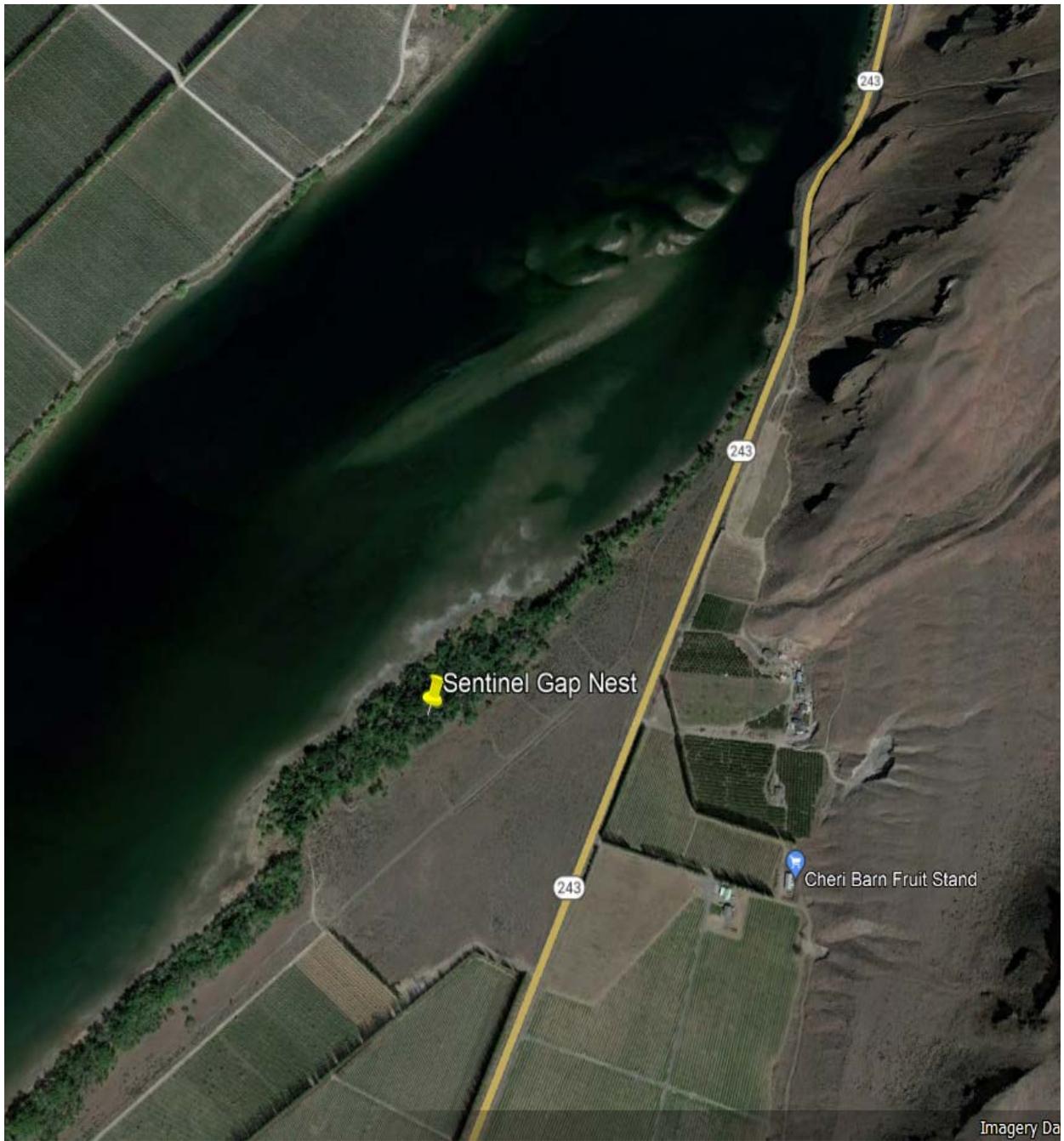
Four previously documented bald eagle nests, identified as WDFW Bald Eagle Nest Territory 1703 (Wanapum Pool Right Bank/Johnson Creek/Getty’s Cove (The Cove)), Bald Eagle Nest Territory 1820 (Priest Rapids Pool/Goose Island), the A-6 nest (Wanapum Pool Right Bank, opposite Apricot Orchard Boat Launch) and last year’s new nest at Girl Scout Island (just south

of Vantage) were all active again in the early nesting season. Additionally, Grant PUD located a newly constructed nest just south of Sentinel Gap on the left bank (Figure 2).

A nesting survey conducted on April 5, 2022, documented incubating behavior at all five nesting locations. Subsequent nesting surveys conducted after April 21, 2022, noted that the nests located at The Cove and Girl Scout Island had been abandoned. Grant PUD staff visited these locations multiple times throughout the nesting season and were unable to document eagles in the nest or near the area. It is Grant PUD's opinion that these nests failed in 2022 due to a freak storm that deposited over a foot of snow throughout the region on April 14, 2022. A potential new nesting location reported in 2022 located west of Crescent Bar was also abandoned by the April 21<sup>st</sup> survey and was documented to have broken apart and collapsed likely due to the same storm.

Despite the extreme weather conditions that occurred throughout the nesting season there were several successful eagle nests throughout the Project. The Goose Island nest was successful once again in 2022 and produced a juvenile eagle that had fledged by the July 5<sup>th</sup> survey. The nest located at A6 was successful once again in producing a juvenile that was documented sitting on a limb near the nest in late June. The new nest that was constructed in 2022 at Sentinel Gap was also successful in producing twins that were determined to have fledged by mid-July (Figure 3).

Initial nesting surveys for the 2024 reporting season have been promising, with activity documented at most of the existing nesting sites. Grant PUD staff will continue to visit these locations on a regular basis, as well as look for any potential new nesting locations. The results of these surveys will be included in the 2024 Article 414 report.



**Figure 2** New nesting location at Sentinel Gap.



**Figure 3 Sentinel Gap eagle twins photographed on July 5, 2022.**

### **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 2023 reporting period, however, additional surveys will be conducted during the summer of 2023 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 2023 reporting period and has plans to continue throughout the 2024 reporting period.

### **3.3 Riparian Plantings**

Grant PUD planted and/or maintained a number of ponderosa pine and black cottonwood throughout the Project. Crews installed Remote Irrigation Systems at Airstrip, West Bar and Crescent Bar to help establish the 250 perch trees that were planted in the fall of 2019. Additionally, Grant PUD maintained/replanted perch trees at ten additional locations throughout the Project: Apricot Orchard, Crescent Bar, 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 2023, as well as explore additional opportunities for future perch tree plantings. An update on this activity will be provided in the 2024 report.

### **4.0 Summary**

A total of 205 eagles were documented during day use surveys in 2023, which is a reduction from last year's record high of 308 but falls in line with the previous five years of counts, which illustrates a maintained robust population of eagles throughout the Project. Golden eagles continue to be present in the Project, but not in large numbers.

The 2023 field season documented three successful bald eagle nests throughout the Project. The nest located at Goose Island produced a juvenile bald eagle that had fledged by July 5, 2022. The nest located at A-6 produced a juvenile bald eagle that was documented on June 29, 2022. The new nest located near Sentinel Gap successfully produced twins that were documented to have fledged by July 13, 2022. Previously documented nesting locations at The Cove and Girls Scout Island were occupied in early April with incubating behavior documented, however, they were determined to have been abandoned following the severe storm that came through the region on April 14, 2022 that deposited over a foot of snow. Grant PUD is monitoring nesting locations regularly in 2023 and will provide results in the 2024 report.

Grant PUD planted and/or maintained a large number of perch trees throughout The Project during the 2023 reporting season. Remote irrigation systems were installed in order to maximize survival at West Bar, Airstrip, and Crescent Bar with positive results. These remote irrigation systems will be established again at select locations during the 2023 reporting season. Grant PUD will continue to monitor and maintain previous plantings found at ten 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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**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](#)

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USFWS approves as well. S-

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

<[Patrick.Verhey@dfw.wa.gov](mailto: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](mailto:Patrick.Verhey@dfw.wa.gov)

Work schedule is M-Th

**From:** Joseph LeMoine [mailto:[JleMoine@gcpud.org](mailto:JleMoine@gcpud.org)]  
**Sent:** Wednesday, August 10, 2016 11:29 AM  
**To:** Verhey, Patrick M (DFW); Steve Lewis ([Stephen.Lewis@fws.gov](mailto: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.

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Biologist

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