From:	Sweanor, Patricia
To:	Schubert, Alex
Cc:	Reeves, Julie; Amy Nicholas; Ann Belleman; Brad Rogers; clark_mccreedy; Genevieve Skora; Kimberly Dickerson; Kimberly Vincent; Lief Wiechman; Lynn Gemlo; Mark Sattelberg; nathan darnall; Pauline Hope; Tyler Abbott
Subject:	Re: Perch discourager opinion
Date:	Wednesday, March 19, 2014 4:16:29 PM
Attachments:	Perch discouragers6 with track changes AS (3) TS.docx Avian Perch Deterrent language version 2.doc

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hi all,

I think there are some inconsistencies in the proposed language.

In the first paragraph it is stated that "Perch discouragers may increase the potential for electrocution." then in the second paragraph it is stated that - if used, perch discouragers should be installed properly to not cause electrocutions. This should be clarified, if they can be installed to not cause electrocution why don't we simply state they can be used but should be installed properly?

Again note that in the first paragraph it is stated " it is currently the Service's position to not recommend the use of perch discouragers" and then in the 2nd paragraph it is stated" we may support the use of perch discouragers", which appears to conflict with the information in the first paragraph.

Additionally the proposed language does not address how electrocution risk can be minimized by e.g., isolating and insulating energized or grounded equipment to avoid avian contact.

I also wonder if it is necessary to lead into our recommendations with statement "The Wyoming Ecological Services Office of the U.S. Fish and Wildlife Service (Service) has noticed inconsistencies across the state of Wyoming..."

I have made comments in track changes. However,I would still like the group to consider the following version which I have also supplied in a word document.

"Avian perch deterrents are sometimes used to reduce avian electrocutions on powerline structures; however, perch deterrents may have the effect of increasing electrocutions (APLIC 2006). Therefore, the Service does not recommend the installation of perch discouragers to minimize likelihood of avian electrocutions on powerlines, and instead recommends that energized or grounded equipment be isolated and insulated to avoid electrocutions. Adequate spacing of energize parts is required to allow safe perching by large raptors, especially eagles.

Perch deterrents have also been used in attempts to reduce predation on sensitive species (e.g. greater sage-grouse, black-tailed prairie dog, black-footed ferret), by limiting perching opportunities of avian predators (e.g.,raptors, corvids). The efficacy of using perch deterrents to minimize avian predation has not been proven (APLIC 2006). Perch deterrents may reduce, but will not prevent, raptors from preying on species of concern (Slater and Smith 2010). In order to minimize avian predation on

sensitive prey species, the Service recommends that (1) powerlines be buried or placed outside of the habitat of sensitive prey species, and/or (2) structures be designed to minimize perching and nesting (tubular instead of lattice), especially in areas of high resource value.

If Service recommendations are not followed and perch deterrrents are used, the Service recommends they should be installed and maintained to specifications which will minimize the likelihood of avian electrocutions."

Trish

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On Wed, Mar 19, 2014 at 2:41 PM, Schubert, Alex <alex_schubert@fws.gov> wrote:

I think it looks good. I just had a few suggestions (attached in track changes) based on some language we are using in some recent correspondence for the sage-grouse 9-plan amendment.
Thanks!
Alex

On Wed, Mar 19, 2014 at 2:33 PM, Reeves, Julie <julie_reeves@fws.gov> wrote:

Hi, all,

Thank you to everyone who participated in the perch discourager discussions of the past couple of months, and for your work on the various drafts. I apologize for not getting this out sooner. Please take a look at the attached document and let me know your thoughts. It has been through several iterations now, and so I think we are very close to having something formalized.

Send any comments/changes in track changes. Thanks!

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> A thing is right when it tends toward the integrity, stability, and beauty of the biotic community; it is wrong when it tends otherwise. ~Aldo Leopold

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Alex L. S. Schubert
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The Wyoming Ecological Services Office of the U.S. Fish and Wildlife Service (Service) ~~has noticed~~ is aware of inconsistencies across the state of Wyoming in use of~~whether or not~~ perch discouragers ~~are recommended/required for installation~~ on power poles to limit perching of raptors and ravens. Perch discouragers may increase the potential for electrocution (APLIC 2006).~~;~~ I~~therefore~~n agreement with the Avian Power Line Interaction Committee, which has developed best management practices for avoiding electrocutions (APLIC 2006) of birds on power lines ~~it is currently~~ the -Service~~'s~~ ~~position to~~ does not recommend the use of perch discouragers~~. This opinion is in compliance with the guidance from the Avian Power Line Interaction Committee, which has developed best management practices for avoiding electrocutions (APLIC 2006) and collisions (APLIC 2012) of birds on power lines~~. ~~However,~~ T~~t~~here is~~has been~~ continuing interest in using perch discouragers to minimize perching opportunities in some sensitive species' habitats (e.g. greater sage-grouse, mountain plover, and black-footed ferret). However, u~~U~~sing perch discouragers on power poles may reduce, but will not prevent, raptors from preying on species of concern (Slater and Smith 2010), and may increase electrocution risk for avian species.

~~The Service uses the best available science to make recommendations to Federal agencies and project developers on measures to avoid and minimize impacts to our trust resources, including federally listed species, migratory birds, and eagles.~~ Our recommendations regarding powerline construction are generally three-part. First, we recommend that the infrastructure be constructed outside the vicinity of sensitive prey species. Second, if the infrastructure is to be constructed near or within habitat for sensitive prey species, we recommend the use of structure types that offer few~~er~~ or no perching opportunities. Third, if the project cannot be sited outside of the sensitive prey species' area and tower structures that offer fewer perching alternatives cannot be used, then we may ~~recommend~~ support the use of perch discouragers to reduce perching and predation/depredation. If perch discouragers are ~~recommended~~used, they should be installed properly and not cause electrocutions or encourage nesting. Other mitigation options may include burying lines or habitat improvements.

Comment [TS1]: ?

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Comment [TS2]: What is the purpose in saying this? FWS recommendations will not change those inconsistencies. We provide recommendations on other subjects without first identifying that some agencies don't agree with us. To me this lead in sentence sounds defensive.

Comment [TS3]: This document does not address perch discouragers.

Comment [TS4]: This negates the information in the first paragraph

Comment [TS5]: If they can be installed to not cause electrocution why don't we support their use?

Literature cited:

Avian Power Line Interaction Committee (APLIC). 2006. Suggested practices for avian protection on power lines: The state of the art in 2006. Edison Electric Institute, APLIC and the California Energy Commission. Washington, D.C. and Sacramento, CA.

Avian Power Line Interaction Committee (APLIC). 2012. Reducing avian collisions with power lines: The state of the art in 2012. Edison Electric Institute and APLIC. Washington, D.C.

Slater, S.J. and J.P. Smith. 2010. Effectiveness of raptor perch deterrents on an electrical transmission line in southwestern Wyoming. Journal of Wildlife Management 74(5):1080-1088.

Avian perch deterrents are sometimes used to reduce avian electrocutions on powerline structures; however, perch deterrents may have the effect of increasing electrocutions (APLIC 2006). Therefore, the Service does not recommend the installation of perch deterrents to minimize likelihood of avian electrocutions on powerlines, and instead recommends that energized or grounded equipment be isolated and insulated to avoid electrocutions. Adequate spacing of energize parts is required to allow safe perching by large raptors, especially eagles.

Perch deterrents have also been used in attempts to reduce predation on sensitive species (e.g. greater sage-grouse, black-tailed prairie dog, black-footed ferret), by limiting perching opportunities of avian predators (e.g.,raptors, corvids). The efficacy of sing perch deterrents to minimize avian predation has not been proven (APLIC 2006). Perch deterrents may reduce, but will not prevent, raptors from preying on species of concern (Slater and Smith 2010). In order to minimize avian predation on sensitive prey species, the Service recommends that (1) powerlines be buried or placed outside of the habitat of sensitive prey species, and/or (2) structures be designed to minimize perching and nesting (tubular instead of lattice), especially in areas of high resource value.

If Service recommendations are not followed and perch deterrents are used, the Service recommends they should be installed and maintained to specifications which will minimize the likelihood of avian electrocutions.