From:	Rogers, Brad
To:	Reeves, Julie
Cc:	Alex Schubert; Amy Nicholas; Ann Belleman; clark_mccreedy; Genevieve Skora; Kimberly Dickerson; Kimberly_Vincent; Lief Wiechman; Lynn Gemlo; Mark Sattelberg; nathan darnall; Patricia Sweanor; Pauline Hope; Tyler_Abbott
Subject:	Re: Perch discourager opinion
Date:	Wednesday, March 19, 2014 3:48:25 PM
Attachments:	Perch discouragers with track changes (AS_LW_BPR).docx

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Looks good. Couple of edits to the next to last sentence.

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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!
>
> ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~
> Julie Reeves
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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

The Wyoming Ecological Services Office of the U.S. Fish and Wildlife Service (Service) has noticed inconsistencies across the state of Wyoming in 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); therefore it is currently the Service's position to 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, there has been 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). Using 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. Perch discouragers may also increase nesting substrate for corvids which could impact population demographics of the aforementioned prey-species (Howe et al. 2013).

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 sited/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 with design features that offer fewer 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/depred~~on a case-by-case situation~~ation~~. If perch discouragers are ~~recommended~~used, they should be properly installed on structures which already meet or exceed APLIC guideiles for raprot protection ~~***When perch management is used for this purpose, it will only be placed on equipment that is raptor friendly prior to the installation of the perch management device. Extreme care will be used to ensure that perch management does not increase the chance of electrocution of birds.~~

~~properly~~ to ensure they do not ~~and not~~ cause electrocutions or encourage nesting. Other mitigation options may include burying lines or habitat improvements.

Comment [LW 1]: Wouldn't we typically have the sensitive species range/habitats identified? Should we use that to be more direct as opposed to 'vicinity'…? Just a thought.

Comment [LW 2]: Same as vicinity.

Comment [LW 3]: Is this an 'out' that undermines the message?

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.

Howes et al. (2013)

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.