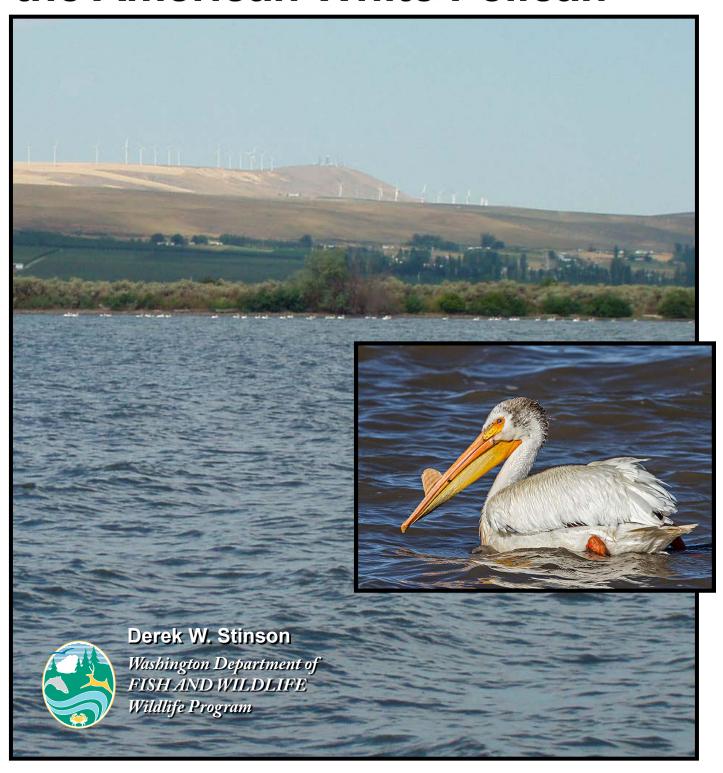
Periodic Status Review for the American White Pelican



The Washington Department of Fish and Wildlife maintains a list of endangered, threatened, and sensitive species (Washington Administrative Codes 232-12-014 and 232-12-011). In 1990, the Washington Wildlife Commission adopted listing procedures developed by a group of citizens, interest groups, and state and federal agencies (Washington Administrative Code 232-12-297). The procedures include how species listings will be initiated, criteria for listing and delisting, a requirement for public review, the development of recovery or management plans, and the periodic review of listed species.

The Washington Department of Fish and Wildlife is directed to conduct reviews of each endangered, threatened, or sensitive wildlife species at least every five years after the date of its listing by the Washington Fish and Wildlife Commission. The periodic status reviews are designed to include an update of the species status report to determine whether the status of the species warrants its current listing status or deserves reclassification. The agency notifies the general public and specific parties who have expressed their interest to the Department of the periodic status review at least one year prior to the five-year period so that they may submit new scientific data to be included in the review. The agency notifies the public of its recommendation at least 30 days prior to presenting the findings to the Fish and Wildlife Commission. In addition, if the agency determines that new information suggests that the classification of a species should be changed from its present state, the agency prepares documents to determine the environmental consequences of adopting the recommendations pursuant to requirements of the State Environmental Policy Act.

This document is a Periodic Status Review for the American White Pelican. It contains an update of information pertaining to the status of the white pelican in Washington. It was reviewed by species experts and was available for a 90-day public comment period. All comments received were considered during the preparation of the final periodic status review.

The Department intends to present the results of this periodic status review to the Fish and Wildlife Commission at a meeting on 4 November 2016.

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On the cover: photo of pelican by Joe Higbee; background of pelicans at Badger Island by Mike Livingston.



This work was supported in part by personalized and endangered species license plates



Periodic Status Review for the American White Pelican in Washington



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EXECUTIVE SUMMARY

The American White Pelican (*Pelecanus erythrorhynchos*) is a large colonial nesting bird that eats mostly non-game fish, such as carp, suckers, and sticklebacks, as well as amphibians and crayfish. The species was listed as a state endangered species in Washington in 1981. They are not listed under the federal Endangered Species Act, but are protected under the Migratory Bird Treaty Act.

American White Pelican (or 'white pelican') numbers and range were reduced throughout the 19th and early 20th century due to habitat loss, persecution, and pesticide contaminants, especially DDT. In more recent decades, populations have recovered from pre-1970 declines; western colonies contained an estimated 42,692 breeding adults in 2014. Despite overall improved status, the white pelican remains a species of moderate conservation concern, primarily because of the concentration of birds on relatively few breeding colonies, and their vulnerability to disturbance, water level fluctuations, disease, and history of 'boom and bust' productivity.

Concurrent with range-wide increases, the numbers of American White Pelicans observed in Washington have increased substantially in the last 30 years. Historically, white pelicans bred in eastern Washington on Moses Lakes, and perhaps at Sprague Lake and a few other sites. There are no published records of nesting after 1926, but several hundred pelicans were seasonally on Moses Lake into the 1940s. In 1994, after an absence of breeding for ~50 years, a breeding colony was established in the Columbia River north of the mouth of the Walla Walla River. Since that time, the colony has grown steadily, and 3,118 white pelicans were counted in aerial photos in May 2016. In 2010, another colony formed on Miller Sands in Oregon waters of the Columbia River estuary. Aerial photographs from May 2016 contained 492 adults and 351 nests, but the colony was abandoned in June. Inland waters of eastern Washington also support significant numbers of non-breeding (1–2 year old) white pelicans, especially along the Columbia River from The Dalles to Chief Joseph Pool. During summer, up to 2,000 birds are observed in the Potholes region; smaller numbers remain in winter, but most winter in southern California.

Although white pelicans eat mostly carp and suckers, they sometimes consume fish resources that are of conservation concern or have recreational value. White pelicans are large conspicuous birds that have increased in number and many observers assume they are impacting salmonid runs. However, based on smolt PIT tag detections, the pelicans nesting at Badger Island and Miller Sands, do not seem to be an important source of mortality for out-migrating juvenile salmonids in the Columbia and Snake rivers. There is some evidence that impacts on salmonids may be more significant at certain times and places in tributaries such as the Yakima River.

Although white pelicans have recovered substantially, populations remain somewhat vulnerable and Washington still only hosts a single colony. White pelicans are highly sensitive if disturbed by humans or predators on breeding colonies and prone to desert or leave eggs and young exposed to predation. Other factors affecting white pelican populations include diseases, severe weather, and loss of breeding and foraging habitats due to water level changes.

Given the increase in numbers and the new colony in the Columbia River estuary, the white pelican may no longer fit the definition of endangered in Washington, as defined in WAC 232-12- 297: Endangered species are, "seriously threatened with extinction throughout all or a significant portion of its range within the state." It is recommended that the American White Pelican be down-listed to state threatened in Washington. A threatened species is, "likely to become an endangered species within the foreseeable future throughout a significant portion of its range within the state without cooperative management or removal of threats."



INTRODUCTION

The American White Pelican (*Pelecanus erythrorhynchos*) is a large (8–9.5 ft wingspan; 12–20 lbs) white bird with black outer wing feathers, and a large orange-yellow bill and distensible gular pouch (Fig. 1). They are colonial-nesting and prey on fish, amphibians and crayfish. White pelicans are known for their habit of flying in formations and sometimes foraging cooperatively in coordinated swimming groups to encircle fish.

The species has been listed as a state endangered species in Washington since

Figure 1. American White Pelican (photo by Joe Higbee).

1981. They are not listed under the federal Endangered Species Act, but are protected under the Migratory Bird Treaty Act.

DISTRIBUTION

The American White Pelican (*Pelecanus erythrorhynchos*) is widespread in much of western and southeastern North America (Fig. 2). It is frequently encountered at lakes, reservoirs, and rivers; it breeds at widely scattered island colonies. Pelicans that breed at colonies east of the Continental Divide migrate southeast toward the Gulf Coast and Mexico to winter (Evans and Knopf 1993). Birds from colonies west of the Divide generally winter along the Pacific coast from central California to Central America, and interior locations of southern California and southwestern Arizona (Yates 1999, Knopf and Evans 2004). In Washington, small numbers of white pelicans are seen in winter along major rivers in the Columbia basin (Wahl 2005, eBird 2015).

Murphy (2005) suggested that the eastern and western white pelican populations be evaluated for subspecific status because banding and telemetry data indicated a high degree of separation of migration and wintering areas. Though this separation is still used for management purposes (e.g. flyway plans), genetic studies indicate that the species is panmictic,

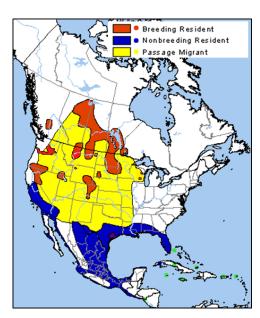


Figure 2. Range of American White Pelican (modified from: Ridgely et al. 2003).

exhibiting evidence of high historical and contemporary gene flow with no genetic structuring across the Continental Divide (Oomen et al. 2011, Reudink et al. 2011). The population east of the Continental Divide is about three times larger than the western population (King and Anderson 2005).

NATURAL HISTORY

Habitat requirements. American White Pelicans breed primarily on isolated islands in freshwater lakes and rivers, and forage in shallow areas. White pelicans are limited by the availability of remote nesting sites and rich foraging habitats. Although white pelicans are somewhat adapted to changes in nesting and foraging sites as a result of droughts and flooding, the largest colonies exist where these resources have been consistent and disturbance by humans or mammalian predators has been rare (Evans and Knopf 1993). Primary winter habitats are shallow coastal bays, inlets, and estuaries with exposed loafing and roosting sites (i.e., sand bars) near foraging areas. Some white pelicans, including some in Washington, winter inland on large rivers, reservoirs, and areas below dams that remain ice-free.

Diet and foraging. White pelicans feed largely on nongame or "rough" fish, mostly small schooling fishes (<1/2 bill length), but also larger sluggish bottom feeders (Knopf and Evans 2004). These include carp (Cyprinus carpio), suckers (Catostomus spp.), sticklebacks (Gasterosteus aculeatus), chub (Couesius spp.), bullheads (Ameiurus spp.), and minnows (Cyprinidae); they also prey on Tiger Salamanders (Ambystoma tigrinum), and crayfish (Cambaridae) (Evans and Knopf 1993, Pacific Flyway Council 2012). American White Pelicans will feed on game fishes, such as trout and juvenile salmonids, particularly when they are concentrated and vulnerable such as spawning runs (Stapp and Hayward 2002, Knopf and Evans 2004). White pelicans can be a problem at aquaculture facilities on their winter range, and where stocked hatchery trout are concentrated (IDFG 2009, Pacific Flyway Council 2012).

Unlike Brown Pelicans (*Pelecanus occidentalis*), American White Pelicans do not dive, but forage by 'bill dipping'; they scoop prey into their pouch and tip their bill up to swallow (McMahon and Evans 1992a). They are opportunistic foragers and often feed in groups, forming lines to either drive fish into shallow water or surrounding them in more open areas (Anderson 1991, McMahon and Evans 1992a). Foraging for small fish occurs in shallow (less than 8 ft) marshes, rivers, and lake margins in summer, and shallow coastal marine waters in winter. However, they will feed in deep water if prey species are at or near the surface (Anderson 1991). Nocturnal foraging is common during the breeding season (McMahon and Evans 1992b). White pelicans will also pirate fish from other species, such as Double-crested Cormorants (*Phalacrocorax auritus*) (Anderson 1991).

White pelicans are a mobile species. While they often forage within 50 km of the colony, they will make use of thermals to travel much longer distances to forage when necessary (Evans and Knopf 1993). Telemetry indicated that birds from a Nevada colony took advantage of air currents and thermals, occasionally flying ~70 mph (112 kph) and at heights >10,000 ft (>3.2 km) above the ground; round trips exceeding 200 mi (322 km) were a "common occurrence;" birds made occasional foraging trips from Nevada colonies over the Sierra Nevada to foraging sites in California's Central Valley (Yates 1999). Satellite telemetry studies indicate that white pelicans in Montana regularly commuted round-trips of >200 mi (322 km) to forage throughout eastern Montana, North Dakota, and Saskatchewan (Madden and Restani 2005). Birds from the Stum Lake colony in British Columbia foraged at ~40 lakes across an 11,580 mi² (30,000 km²) area (B.C.M.E. 2009).

Reproduction and life history. White pelicans lay one clutch of 2 eggs per year; adults share duty during the 30 day incubation period, and then brood the altricial young for about 25 days (Evans and Knopf 1993). Generally only one chick survives; at 3 weeks chicks are somewhat mobile and form into crèches with other chicks, while the parents stay at foraging areas and only return to feed them. Chicks make their first flights at 9–10 weeks, and depart the colony to join adults at foraging areas at about 10–11 weeks. White pelicans first breed at 3 years of age (Evans and Knopf 1993). Banded pelicans in Montana generally returned to their natal colony, and movements between Montana colonies were rare (Hendricks and Johnson 2002). Chick survival was 59% from fledging through the first year, 84% in the

second year, with a mean of ~82% for year 3–20, (correcting for bands that wear out and begin to drop off at 10.7 years; Ryder 1981). Band returns indicate they can live to >26 years of age (Clapp et al. 1982).

Sources of mortality. Adult white pelicans are rarely killed by natural predators. Shooting was historically a significant source of mortality, based on band returns, but may no longer be a major factor in the United States (Strait and Sloan 1975, Hendricks and Johnson 2002). Severe weather, diseases (e.g. botulism and West Nile Virus), collisions with wires or objects, and contaminants can occasionally be important causes of mortality. Prolonged cold, wet, and windy conditions, especially during the critical transition period between brooding and crèche formation, can have devastating effects on chick survival (Sovada et al. 2013). Severe hailstorms have also killed substantial numbers (Rocke et al. 2005). Cold weather and hailstorms resulted in >50% mortality of the chicks in the Medicine Lake NWR in Montana in 1940, 1954, and 1993 (Madden and Restani 2005).

Disturbance and associated predation at breeding sites are a major mortality factor for white pelican eggs and chicks, particularly hatchlings <3 weeks of age (Evans and Knopf 1993). Gulls (*Larus* spp.) and Common Ravens (*Corvus corax*) take eggs; Great Horned Owls (*Bubo virginianus*), Bald Eagles (*Haliaeetus leucocephalus*), and Black-crowned Night-Herons (*Nycticorax nycticorax*) take young. Gull predation can be high if the colony is disturbed by humans or a mammalian predator. Mammals, particularly Coyotes (*Canis latrans*) and Red Foxes (*Vulpes vulpes*) are not usually a problem at the island colonies except when low water levels expose a land bridge. Bald Eagles, River Otters (*Lontra canadensis*), and humans have disturbed the Miller Sands colony, and an otter or Raccoon (*Procyon lotor*) killed chicks at Badger Island in 2010 (D. Lyons, pers. comm.). In addition to facilitating egg and chick predation by gulls, human disturbance (e.g., by foot, boat, or plane) can cause pelicans to abandon nests or entire colonies for the season (Evans and Knopf 1993).

POPULATION AND HABITAT STATUS

Range-wide population trends. The population and range of American White Pelicans were reduced throughout the 19th and early 20th century due to habitat loss resulting from water projects, persecution, and contaminants. Thompson (1933) reported the permanent destruction of historically critical foraging and nesting habitat. For example, a loss of ~90% of wetland habitat in California, led to the reduction from 11 known colonies in the 19th century to only one colony in 1932 (Shuford 2005). Historically, and to a lesser extent now, white pelicans were shot for 'sport', feathers, or to alleviate suspected impacts to fisheries. Even though studies clearly showed that they seldom preyed on the same fish sought by people, people shot pelicans, clubbed young, and broke eggs; during the 1920s, pelicans were shot and eggs destroyed, even in Yellowstone National Park (Schaller 1964).

Thompson (1933) tallied a total population of breeding adult white pelicans of 30,000, but he noted that data for Canada were incomplete. Lies and Behle (1966) estimated the continental population at ~45,000 in 1964. The species was placed on the National Audubon Society Blue List in 1972, due to the vulnerability of colonies (Tate and Tate 1981), and Sloan (1982) suggested they be listed as threatened under the Federal Endangered Species Act.

In more recent decades, populations have recovered from pre-1970 declines; Breeding Bird Survey data for the U.S. suggest an average annual increase ~12% from 2003–2013 (Fig. 3; Sauer et al. 2014). The number of known breeding colonies increased from 43 in the 1960s, to 55 in 1980, while total breeding adults appeared to increase from 63,000 to 109,000 (Sidle et al.1985, Keith 2005), although the apparent increase was likely partly an artifact of more complete surveys. The total number of nests in 20 breeding colonies that were surveyed during 1979–1981 and again in 1998–2001 doubled (King and Anderson

2005); their estimate for 1998–2001 was 134,000 breeding adults, and a total of ~157,000 birds.

Despite their increasing population size, the American White Pelican remains a species of moderate conservation concern. They are concentrated on relatively few breeding colonies and are vulnerable to disturbance, water level fluctuations, disease, and have a history of 'boom and bust' productivity. For example, 28,000 birds abruptly abandoned the largest colony (Chase Lake, ND) during the 2004 nesting season for unknown reasons (Murphy 2005). In total, fewer than 50 colonies may be active in any year, and fewer than 20 have more than 500 nests (King and Anderson, 2005); and only 4

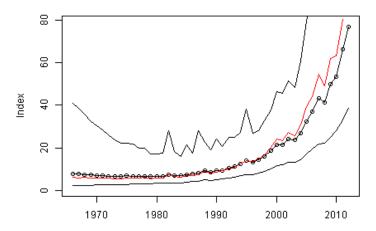


Figure 3. Survey-wide Breeding Bird Survey trend index estimated from a hierarchical model for white pelicans, 1966–2012; solid lines are median of the posterior distribution of yearly indexes and the lower (2.5%) and upper (97.5%) CIs (Sauer et al. 2014).

large breeding colonies in the northern Great Plains account for 84,000 adults (Sovada et al. 2013).

Western population. The western population includes all white pelicans known to breed west of the Continental Divide, plus the colonies at Yellowstone Lake, Wyoming and Canyon Ferry Lake and Arod Lake, Montana. In the late 19th century, there may have been upwards of 60,000 breeding birds at 23–24

Table 1. Estimated number of breeding American White Pelicans at western colonies in 2014 (Pacific Flyway Council 2015)

Colony Name	State	2014	Percent of
		estimate	western population
Anaho Island NWR	NV	16,224	38.0
Gunnison Island WMA ¹	UT	9,428	22.1
Minidoka NWR	ID	4,264	10.0
Badger Island, McNary NWR	WA	3,670	8.6
Canyon Ferry Lake	MT	3,432	8.0
Blackfoot Reservoir	ID	2,096	4.9
Malheur NWR ²	OR	656	1.5
Molly Lake, Yellowstone NP	WY	614	1.4
Stum Lake	BC	590	1.4
Clear Lake NWR ³	CA	444	1.0
Miller Sand Spit	OR	366	0.9
Upper Klamath NWR	OR	348	0.8
Island Park Reservoir	ID	326	0.8
Arod Lake	MT	234	0.5
Lower Klamath NWR	CA	0	0.0
Crump Lake	OR	0	0.0
Pelican Lake	OR	0	0.0
Ruby Lakes NWR	NV	0	0.0
Total		42,692	100

<250
251-500
501-1,000
1,001-5,000
>5,001

Figure 4. White pelican colony locations and sizes in the western population based on 2002-2012 data (Pacific Flyway Council 2012).

¹The Gunnison Island is threatened by dropping water levels of Great Salt Lake.

²The Malheur colony was vacant in 2015 due to drought.

³The Clear Lake has dropped <1/2 the numbers indicated in figure 4.

colonies in the western states (Paullin et al. 1988, IDFG 2009, Pacific Flyway Council 2012); California alone may have hosted over 20,000 pairs (Shuford 2005). But by the late 1970s, the western population was only about 16,000 birds at 5–8 colonies (Paullin et al. 1988, IDFG 2009, Pacific Flyway Council 2012). Since the 1980s, the western population has increased substantially, and several new colonies have formed (Fig. 4); the 2014 western population estimate is 42,690 breeding adults at 14 colonies (Table 1; Pacific Flyway Council 2015). However, over 60% of the population occurs at only two colonies, and one of these (Gunnison Island) is at risk of falling water levels of Great Salt Lake (Larsen 2015).

Washington population status. In Washington, American White Pelicans were recorded in the Columbia River estuary by Lewis and Clark in 1805, and in the 1830s by John K. Townsend who said that in spring, "they retire inland to breed" (Jobanek and Marshall 1992). White pelicans bred in eastern Washington historically on Moses Lake, and perhaps Sprague and a few other lakes (Dawson and Bowles 1909, Jewett et al. 1953). The first published record of nesting is from 1926 at Moses Lake, Grant County (Brown 1926); that colony may have persisted through the 1930s. Kitchin (1934) states, "breeds in eastern Washington (commonly at Moses Lake)," but there are otherwise no definite records (Motschenbacher 1984). Motschenbacher (1984) noted that a long-time resident recalled that up to ~500 pelicans were present seasonally on Moses Lake from 1902 until the 1940s; Motschenbacher (1984) listed 4 additional sites where pelicans may have once nested (Sprague Lake, Coffee Pot Lake, Kahlotus Lake, and the Pasco/mouth of the Snake River area).

In 1994, a breeding colony was established on Crescent Island, part of McNary National Wildlife Refuge (NWR) which was constructed for nesting birds in the Columbia River, Walla Walla County in 1985 (Ackerman 1994, 1997). In 1997, pelicans began nesting on nearby Badger Island, also in McNary NWR, and ceased nesting on Crescent Island after 1998. Since that time, the colony has grown to over 1,600 breeding pairs. About 50 pelicans attempted to nest on Crescent Island in 2010, but all nests failed (Adkins et al. 2014). A mean of 3,118 white pelicans were counted in aerial photos from May 2016 (Figure 5; D. Lyons, per. comm.). The increase from 2,447 counted in 2014 may reflect an influx of birds from Malheur Lake, where no nesting occurred in 2015, apparently due to low water conditions.

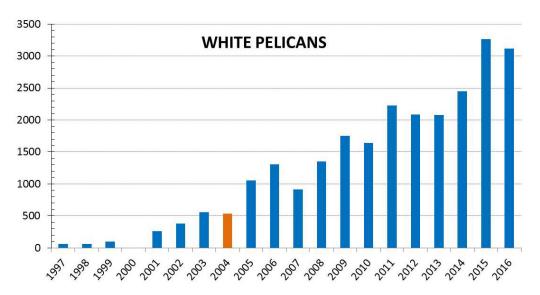


Figure 5. Numbers of American White Pelicans counted during the nesting season at Badger Island, 1997–2016 (Based on high resolution aerial photos; a few birds <10% may be obscured by vegetation; = only low-resolution oblique photos were taken in 2004 and more birds may have been obscured by vegetation; from Bird Research Northwest).



Figure 6. Badger Island and Crescent Island (blue arrow; *from Bird Research Northwest*) in the Columbia River, McNary National Wildlife Refuge (left); pelican nesting aggregations on Badger Island, 2005 (*photo by M.Livingston*).

The first nesting record of white pelicans in the Columbia River estuary occurred at Miller Sands Spit, Oregon, in 2010. In July 2011, an on-colony survey on Miller Sands indicated a colony size of about 97 breeding pairs (Bird Research Northwest 2012). A boat-based survey in April 2015, counted 261 adults and 144 nests (http://www.birdresearchnw.org). In 2016, 492 adults and 351 nests were present in May, but the colony was abandoned in June (P. Loschl, pers. comm.).

Nonbreeding and wintering birds. An increasing number of non-breeders has been noted along the mid-Columbia, lower Snake, and Yakima rivers, where they are often observed foraging below dams (Bird Research Northwest 2013, G. King, pers. comm.). Numbers vary greatly during the summer, with peaks of up to 2,000 birds observed in the Potholes region during late summer. A smaller number of birds remain in Washington during winter, with concentrations ranging from 40–300 birds; most are found in the Columbia River, particularly from Priest Rapids Dam to the Walla Walla River delta (Wahl 2005). Parts of eastern Washington may be important in sustaining non-breeding summer residents and birds that have dispersed from breeding grounds in adjacent states and provinces. Small numbers are recorded elsewhere on the Columbia, Snake, and Yakima rivers and on marine waters west of the Cascades (eBird 2015), including Puget Sound in 2016.

Habitat status--nesting colonies. Badger Island, located on the Columbia River upstream of McNary Dam and near the town of Wallula, is a long, narrow island of about 15 acres and part of McNary NWR. The island is closed to the public in order to avoid human disturbance to nesting pelicans that might cause abandonment of the colony. Pelicans nest in several patches across the island, with a majority of

nests located in the shade of trees and shrubs. Shallow waters surrounding the island provide isolation from the main river channel and most recreational boating during the breeding season. Crescent Island, also part of McNary NWR, consists of ~7.5 acres with a mix of dense shrubs and bare ground. It was created from dredged materials in 1985 (Bird Research Northwest; http://www.birdresearchnw.org/). As part of a plan to reduce the predation of juvenile salmonids, the U.S. Army Corps of Engineers is planting willows to dissuade Caspian Terns (*Sterna caspia*) from nesting (ACOE, Walla Walla District 2014). The habitat change may or may not preclude white pelicans from resuming nesting on Crescent in the future.

Miller Sands is in Clatsop County, Oregon, near the southwest corner of Wahkiakum County, Washington (Fig. 7). It is a 117 acre horseshoe-shaped spit island in the lower Columbia River estuary, from approximate river mile 22.2 to 24.6 (ACOE, Portland District 2014). Historically, the site was created as a flow control structure. It is owned by the State of Oregon and leased by the Port of Portland for material placement by the Army Corps of Engineers. The site is continually eroded by river currents, and about 150,000 cubic yards were placed there in 2013 (ACOE, Portland District 2014). A central embayment is sheltered from the mainstem flows and has a network of mud flats, tidal marsh, and sub-tidal waters and provides habitat for pelicans, shorebirds, waterfowl, etc. Miller Sands is designated as critical habitat for Streaked Horned Larks (Eremophila alpestris strigata)(USFWS 2013).

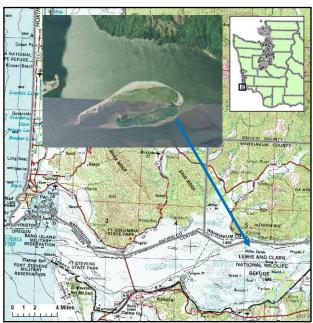


Figure 7. Location of Miller Sands, Clatsop County, Oregon, in the Columbia River.

In September 2012, after nesting activities were concluded and pelicans had departed the island, the 2010–2012 nesting area on Miller Sands was covered with dredged material by the Army Corps of Engineers, or their contractor. Pelicans returned to nest in 2013 (and subsequent years), shifting their nesting to an area on the island where vegetative cover (trees, large shrubs) remained.

FACTORS AFFECTING WHITE PELICANS IN WASHINGTON

Adequacy of Regulatory Mechanisms

Federal protection. The American White Pelican was added to protected species under the Migratory Bird Treaty Act in 1972 (Strait and Sloan 1975). White pelicans have increased dramatically in recent decades, suggesting this protection has been adequate. Badger Island is part of McNary NWR, so protected from development and is closed to the public during the nesting season.

State protections. The American White Pelican was listed as endangered in Washington in 1981, and is protected from 'take' as an endangered species in state law (RCW 77.12.020, RCW 77.15.130). Most shorelines of water bodies used by pelicans for foraging would be considered 'shorelines of the state' and

regulated by the Department of Ecology under the Shoreline Management Act (RCW 90.58.020). Though development of shorelines and filling of wetlands are carefully regulated, regulation of water rights and irrigation may not adequately consider the effect of water level changes on wildlife, such as white pelicans.

Factors Affecting Populations

Although white pelicans have recovered substantially since the mid-20th century, populations remain somewhat vulnerable. Important factors affecting white pelican populations include: (1) loss of breeding and foraging habitats, particularly due to water level changes; (2) disturbances of nesting colonies; (3) disease, particularly West Nile Virus and botulism; and (4) severe weather.

Habitat loss, water level fluctuations, and water quality. Tremendous loss and degradation of wetlands and coastal habitats have occurred throughout North America and the Pacific Flyway (Kushlan et al. 2002, Pacific Flyway Council 2012). Water diversion and draining of wetlands for agriculture, have destroyed or degraded many traditional feeding, breeding, and loafing areas. The site of the 1926 nesting colony at Moses Lake, and the four other possible colony sites have been flooded by dams or are otherwise no longer suitable (Motschenbacher 1984). One of the four sites, Lake Kahlotus, dried up in recent years. Unsustainable pumping of water from aquifers may affect surface water bodies if drought becomes more common, and may affect pelican foraging habitat. Low water is not an issue at Badger Island, but flooding has been an issue in years of high spring run-off (e.g. 1994, 1997, 1998; Ackerman 1997, S. Ackerman, notes on file).

The continued, competing demand for water for agricultural, urban, and fisheries uses may be the greatest long-term threat to white pelicans, and regional waterbird populations in general (Ivey and Herziger 2006). Allocation of water can be, and often is, a contentious issue in western states because water resources are limited, and droughts, which are predicted to increase in frequency and severity with climate change, intensify conflicts. Low water levels decrease success or even eliminate pelican nesting at colonies by exposing land bridges that allow predator access; unpredictable water levels can cause flooding of nests, eggs, and hatchlings (Moreno-Matiella and Anderson 2005, Murphy and Tracy 2005, Pacific Flyway Council 2012).

The Salton Sea in southern California is an important stopover and wintering site, hosting 65-85% of the western population during migration (Pacific Flyway Council 2012). Water quality is affected by agricultural run-off, industrial pollution, sewage, rising salinity and selenium levels, and botulism (Patten et al. 2003, Shuford 2014).

Human disturbance. Although relatively tolerant of human observers on foraging and loafing areas, white pelicans are highly sensitive on breeding colonies and prone to desert or leave eggs and young exposed to predators if disturbed by humans or predators (Evans and Knopf 1993). Even boats and airplanes in the vicinity of a colony may cause pelicans to temporarily leave the colony or abandon it altogether. Protection of breeding colonies from human disturbance has been a primary management concern. In a recent case, the pelican colony on Miller Sands was disturbed in early July 2014 by campers, (in addition to chronic disturbance by River Otters and Bald Eagles); 17 flightless chicks found swimming after a disturbance were taken to a rehabilitation facility by researchers (Bird Research Northwest, weekly update for 7/7-7/13/14 [http://www.birdresearchnw.org/project-info/weekly-update/columbia-river-estuary/2014-updates/]). The colony was again found to be abandoned in June 2016; the reason was not clear, but mammal tracks were reportedly present (P. Loschl, pers. comm.).

Disease-botulism. Diseases are a significant source of mortality for white pelicans, and have caused

substantial die-offs. White pelicans have died in numerous outbreaks of avian botulism caused by *C. botulinum* type C since 1980 (Madden and Restani 2005, Rocke et al. 2005). Outbreaks of type C botulism are somewhat unpredictable, but are often associated with lower water levels, high summer surface temperatures, and mass production of filamentous algae (Espelund and Klaveness 2014). The disease spreads through necrophagous flies depositing eggs on dead and toxic animal carcasses. Climate change, that may involve higher summer temperatures, prolonged dry periods, and lower lake levels, may increase the frequency of outbreaks (Espelund and Klaveness 2014).

Disease-West Nile Virus. West Nile virus (WNV)—associated deaths of white pelican chicks have been reported at various nesting colonies in the United States since 2002 (Johnson et al. 2010). WNV was the presumed cause of >9,000 white pelican deaths in 7 states in 2002–2003 on the basis of testing of a sample of carcasses from various affected colonies (Rocke et al. 2005, Johnson et al. 2010). Prior to the arrival of WNV in the northern Great Plains region in 2002, chick mortality rates in the late breeding season were less than 5%, but in the years since were as high as 44% (Sovada et al. 2008).

Climate change and severe weather. The median location of active white pelican colonies has shifted northward 2.57 degrees (285 km) in the last 53 years (Moulton and Wackenhut, *cited in IDFG 2016*), and colonies in the northern plains may be experiencing population level effects attributable to climate change. Adult pelicans begin to terminate brooding when the chicks are about 2 weeks of age, enabling both parents to make extended foraging trips. Pelican chicks of 14–25 days of age are not able to fully thermoregulate, so chicks from many nests form crèches, crowding together to help them stay warm at night and during inclement weather. Spring arrival by pelicans at Chase Lake National Wildlife Refuge in North Dakota has advanced approximately 16 days over a period of 44 years (1965–2008; Sovada et al 2014). The earlier timing of pelican arrival has resulted in more frequent and severe losses of pelican chicks because chicks are more frequently exposed to severe weather conditions than under the 1965-based phenology pattern. Cold and wet weather and severe storms resulted in the death of thousands of 2–4 week old chicks in 2005, 2006, 2007, and 2008 (Sovada et al. 2014).

Similar impacts may occur in Washington, because most climate models predict an increase in precipitation in spring and an increase in days with >1 inch of precipitation (Dalton et al. 2013). A severe rain storm occurred in the area of the Badger Island colony in May 2015, and rain accompanied by unseasonal cold occurred in May 2013 (H. Newsome, pers. comm.); the effects, if any, on pelican productivity were not assessed. Some breeding colonies will probably also be affected by droughts, if droughts increase in frequency and severity as climate models suggest (Mote and Salathé 2010). The increase in pelican numbers on Badger Island from 2014 to 2015 may have been due to low water elsewhere (e.g. Malheur Lake). Droughts could negatively impact some foraging habitat, but new shallows would presumably be available, so it is not clear how this might affect the Badger Island colony.

Pesticides and contaminants. Many wetlands in the arid West are affected by insecticides, mercury, selenium, fertilizers and other agricultural pollutants. Bioaccumulation of contaminants, particularly DDT and its metabolites, likely contributed to population declines during the mid-20th century (Keith 2005), and may continue to pose threats to white pelicans in some locations (Kushlan et al. 2002, Ivey and Herziger 2006). Pesticides (e.g. endrin, dieldrin, and toxaphene) often caused deaths and episodic die-offs of white pelicans (Keith 2005, Rocke et al. 2005). Population increases since ~1980 have followed the slow decreases of persistent insecticide residues in the environment and in white pelican tissues. In Washington, organochlorine contaminants were generally low in 4 addled white pelican eggs collected on Crescent Island in 1994 (Blus et al. 1998). They were also below levels determined to affect reproduction in recent samples from colonies in Nevada and North Dakota (Wiemeyer et al. 2005, Pietz et al 2008).

Bio-accumulation of mercury and selenium can also be an issue for fish-eating birds. Wiemeyer et al. (2007) evaluated mercury and selenium in white pelicans breeding at Pyramid Lake, Nevada. Mercury and selenium concentrations in eggs were generally below known-effect levels and did not appear to be affecting hatching success, but some adult pelicans had elevated mercury concentrations in their livers (Wiemeyer et al. 2007).

Fisheries conflicts. Although white pelicans eat mostly carp, suckers, and tiger salamanders, they do sometimes consume fish resources that are of conservation concern or have significant economic or recreational value and intervention is sometimes needed (Pacific Flyway Council 2012). White pelicans forage on concentrations of easily accessible fish, and fish reared at hatcheries are sometimes particularly vulnerable. Predation on game fish can result in economic effects due to loss of both the investment in hatchery production and the foregone economic contribution of angling to local economies. White pelicans are also large conspicuous birds that have recently increased in number in some locations (although recent increases may represent recovery to levels prior to DDT associated population declines). Consequently, they may receive a larger share of the 'blame' for predation on fish runs of concern than they deserve.

Avian predation on the 13 federal ESA-listed salmonid (*Oncorhynchus* spp.) distinct population segments in the Columbia Basin has been an on-going concern, and the number of white pelicans breeding at the Badger Island colony as well as the number of non-breeding pelicans along the Columbia, Snake, and Yakima rivers have increased substantially (Wahl 2005, Adkins et al. 2014, Bird Research Northwest 2014). Based on smolt PIT tag detections on Badger Island, however, white pelicans from the colony do not appear to be a significant source of mortality for ESA-listed smolts. Predation rates by pelicans from the Badger Island colony on listed salmonid populations were the lowest observed among nine bird colonies investigated (Evans et al. 2012, 2016), with Caspian Terns (*Hydroprogne caspia*) and Double-crested Cormorants preying on salmon smolts much more often. However, the increasing number of non-breeding white pelicans in the Columbia Plateau region, and observations of pelicans foraging below dams when large numbers of salmonid outmigrants are known to be present, may indicate some predation on out-migrating juvenile salmonids. That localized predation and potential impact on salmonid populations is not yet well understood; diet and consumption studies, for example, have not been performed. In the Columbia River estuary, white pelicans nesting on Miller Sands Spit pose almost no risk to out-migrating juvenile salmonids (Bird Research Northwest 2012).

Yakama Nation Fisheries biologists believe American White Pelicans may in fact be a significant source of mortality for juvenile salmon of the Yakima River (M. Porter, pers. comm.). Data from 2008–2014

indicate that a total of 7,716 PIT tags (42–46% of 18,237) found on Badger Island belonged to salmon from the Yakima River Basin (Yakama Fisheries Program data). Summer and Fall Chinook account for 63% (4,872 tags) of the recovered Yakima tags and preliminary analyses of minimum predation rates by Badger Island pelicans suggest that predation rates on these later migrating (non-ESA-listed) smolts were twice as great as those on (also non-ESA-listed) Yakima River



Figure 8. White pelicans at Horn Rapids (Wanawish) Dam, Yakima River (photo by M. Livingston).

Spring Chinook, and greater than observed by pelicans on ESA-listed Chinook populations from the Upper Columbia River or Snake River (Bird Research NW unpublished data, Evans et al. 2012). Pelican predation on some small (3–4") age 0 summer and fall Chinook smolts may be a consequence of attraction to abundant populations of Northern Pikeminnow (*Ptychocheilus oregonensis*), Bridge-lip and Largescale Suckers (*Catostomus columbianus*, *C. macrocheilus*), Chiselmouth (*Acrocheilus alutaceus*), Common Carp, and other larger (6–12"+) prey in these locations. The Summer and Fall Chinook also migrate in the late spring when flows are dropping and water clarity improves, and are easy prey for terns and gulls, as well as for pelicans. Nonetheless, white pelicans are consistently found in significant numbers on the Yakima River, and during smolt outmigration there may be 150 along the Wapato Reach, and "large numbers" at Horn Rapids (Wanawish) Dam (Fig. 8), and at the outflow of the Prosser Tribal Hatchery (M. Porter, pers. comm.).

Elsewhere, there is concern about white pelican depredation of Yellowstone and Bonneville Cutthroat (*O. clarkii bouvieri*, *O. c. utah*) in Idaho. White pelicans may also prey on several federally threatened species, including Lahontan Cutthroat (*O. c. henshawi*) and suckers in Nevada (Cui-ui, *Chasmistis cujus*), and the Klamath Basin of northern California/southern Oregon (Lost River Sucker [*Deltistes luxatus*], and Short-nose Sucker [*Chasmistes brevirostris*]) (IDFG 2009 2016, Pacific Flyway Council 2012).

The Pacific Flyway Council (2012) developed a policy statement, "intended to provide general guidance to member states of the Pacific Flyway when addressing migratory bird predation issues on fish resources in open waters." It discusses non-lethal and lethal methods to reduce depredation, and permit requirements for lethal control. [A federal permit is not required to harass or scare birds (except eagles and threatened or endangered species), provided (a) birds are not killed or injured and (b) birds sitting on active nests (nests with eggs or chicks present) are not disturbed to the point that it causes the eggs to not hatch or the chicks to die or become injured. A depredation permit is required to destroy an active nest.] If all practicable non-lethal management actions have proved ineffective, managers may apply to the USFWS Regional Migratory Bird Permit Office to lethally take white pelicans through depredation permits. During 2005–2010 in the Pacific Flyway, depredation permits authorized the take of up to 432 pelicans at aquaculture facilities, but only 16 were lethally taken (in California, Colorado, and Wyoming; Pacific Flyway Council 2012). After limited success with non-lethal methods, Idaho Fish and Game has taken white pelicans annually at Blackfoot Reservoir to reduce predation on Yellowstone Cutthroat, with up to 500 nests and 69 adults taken per year since 2012; a revised draft plan has the goal to "maintain viable breeding populations of pelicans in Idaho while reducing impacts to native fish and recreational fisheries" (IDFG 2016).

Piscivorous bird management. The Army Corps of Engineers implemented dissuasion measures (fencing, ropes, and flagging along with human hazing) at Crescent Island in 2015 to get Caspian Terns to disperse from the site (ACOE, Walla Walla District 2014). They also are doing experimental planting of willows (*Salix* spp.) and other native trees in an attempt to make the island less suitable for tern nesting. Dissuasion activities are anticipated to occur each nesting season through 2018. As a result of the dissuasion activities, the large colony of California Gulls (*Larus californicus*) on Crescent Island also dispersed, with a sizable portion (>3,000 individuals) moving to Badger Island. However, this did not appear to impact pelican nesting activity (D. Lyons, pers. comm.), but California Gulls are known to take unattended eggs at pelican colonies, particularly when colonies are disturbed (Knopf and Evans 2004, Sovada et al. 2013).

MANAGEMENT ACTIVITIES

The Pacific Flyway Council developed a management framework (2012) and a monitoring strategy (2013) for American White Pelicans in the Pacific Flyway. Guidance was needed for agencies and locations dealing with pelican predation on fish of conservation concern.

Monitoring and research. The Pacific Flyway Council has made a commitment to the long-term coordinated monitoring of white pelican nesting colonies, with surveys conducted every three years. Monitoring of pelican nesting colonies in Washington and Oregon has generally been done by Bird Research Northwest (birdresearchnw.org), a collaborative project between Oregon State University (Don Lyons, Pete Loschl, Tim Lawes), Real Time Research Inc. (Bend, Oregon; Ken Collis, Allen Evans), and the USGS-Oregon Cooperative Fish and Wildlife Research Unit (Dan Roby). They have been investigating predation by birds on salmonids in the Columbia River system and elsewhere in the Northwest with funding from ACOE and the Bonneville Power Administration. During the nesting season, boat-based counts of the colony on Badger Island are conducted periodically, and high-resolution, vertical aerial photographs are taken of the colony each year during the incubation period as an index to colony size (Bird Research Northwest 2013). WDFW and Yakama Nation biologists conducted surveys of the colony and the Yakima River basin in 2005 and 2006. No other management or research is underway in Washington, but multiple projects have been conducted elsewhere to monitor major colonies, document movement patterns, and investigate genetics, and factors affecting white pelican populations (see Literature Cited).

CONCLUSIONS AND RECOMMENDATION

The numbers of American White Pelicans observed in Washington has increased substantially in the last 30 years. In 2016, 3,118 adults were counted in aerial photos taken in May of the Badger Island nesting colony; the increase since 2014 was partly due to low water conditions elsewhere. In addition, a smaller nesting colony now exists on Miller Sands in Oregon waters of the Columbia River estuary, although it was abandoned due to disturbance in 2014, and again in 2016. Though the situation for white pelicans has improved, Washington still hosts only a single colony, and white pelicans are notoriously sensitive to disturbance. A single major disturbance could lead to temporary abandonment of the Badger Island colony and failure of at least one nesting season, but such a setback would likely be temporary as long as regional numbers remain high, the nesting island is generally secure, and food resources remain relatively stable. Repeated disturbance during the nesting period, however, could lead to colony abandonment, and it is not clear they would find a secure alternate site in Washington, leading to their extirpation as a breeding species in Washington

Management to address Caspian Tern predation on salmon smolts resulted in a shift of a California Gull colony from Crescent Island to Badger Island; gulls are known to take unattended pelican eggs, but the effect on pelican nest success on Badger Island is unknown. American White Pelicans are also noted for 'boom and bust' productivity, and remain at risk to disease, toxins, and extreme weather.

Given the increase in numbers and the new colony in the Columbia River estuary, the white pelican may no longer fit the definition of endangered in Washington, as defined in WAC 232-12- 297: Endangered species are, "seriously threatened with extinction throughout all or a significant portion of its range within the state." It is recommended that the American White Pelican be down-listed to state threatened in Washington. A threatened species is, "likely to become an endangered species within the foreseeable future throughout a significant portion of its range within the state without cooperative management or removal of threats."

LITERATURE CITED

The references cited in the Periodic *Status Review for the American White Pelican* are categorized for their level of peer review pursuant to section 34.05.271 RCW, which is the codification of Substitute House Bill 2661 that passed the Washington Legislature in 2014. A key to the review categories under section 34.05.271 RCW is provided in Table A. References were categorized by the author in October 2015.

Individual papers cited cover a number of topics discussed in the report, including information on: 1) the species' description, taxonomy, distribution, and biology; 2) habitat requirements; 3) population status and trends; 4) conservation status and protections; 5) research, monitoring, and restoration activities; and 6) factors affecting the continued existence of the species.

Table A. Key to 34.05.271 RCW Categories:

Category Code	34.05.271(1)(c) RCW
i	(i) Independent peer review: review is overseen by an independent third party.
ii	(ii) Internal peer review: review by staff internal to the department of fish and wildlife.
iii	(iii) External peer review: review by persons that are external to and selected by the department of fish and wildlife.
iv	(iv) Open review: documented open public review process that is not limited to invited organizations or individuals.
V	(v) Legal and policy document: documents related to the legal framework for the significant agency action including but not limited to: (A) federal and state statutes; (B) court and hearings board decisions; (C) federal and state administrative rules and regulations; and (D) policy and regulatory documents adopted by local governments.
vi	(vi) Data from primary research, monitoring activities, or other sources, but that has not been incorporated as part of documents reviewed under the processes described in (c)(i), (ii), (iii), and (iv) of this subsection.
vii	(vii) Records of the best professional judgment of department of fish and wildlife employees or other individuals.
viii	(viii) Other: Sources of information that do not fit into one of the categories identified in this subsection (1)(c).

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PERSONAL COMMUNICATION

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APPENDIX A. PUBLIC COMMENTS ON THE DRAFT PERIODIC STATUS REVIEW

	Comment and response
General comments	I remain very concerned about the obvious conflict of interest your agency and USFWS both share; it is in your absolute career, funding, personal and professional interest to "list" and "manage" and "recover" and "plan". You should not be the deciders. We have seen so much abuse of this system that I believe an independent science board not related to or beholden to WDFW should start making unbiased, fair and smart decisions on these species listing status.
	State-listing decisions in Washington are made by the Fish and Wildlife Commission, an independent board of citizens appointed by the Governor and confirmed by the senate. Many members are scientists, and all have knowledge of fish or wildlife issues. Our status reviews and recommendations also receive peer review by regional experts outside WDFW.
	Washington State is literally the only state left that is continually disregarding the outstanding recovery of this species to maintain their listing status, while simultaneously jeopardizing several other listed species (e.g. salmon) that call Washington home.
	White pelicans are also listed as endangered in British Columbia, where they also are restricted to one colony. White pelicans are also a 'species of greatest conservation need' in the Wildlife Action Plans of all eight western states in which they breed (IDFW 2016), and they have various conservation designations (e.g. Oregon: Sensitive; California: Bird Species of Special Concern).
Population status	This species is not even known with certainty to have been native to Washington State in a breeding population. The WDFW's own "Periodic Status Review for the American White Pelican" states that there are no definite records of their nesting in the state other than one from 1926. Your document says they "likely" bred in inland waterways. Where is the actual evidence of such activity? Post-1926 records do not reflect this: what evidence did you rely upon to conclude there were meaningful breeding numbers in those areas prior to 1926?
	Lewis and Clark observed white pelicans in Washington in 1805, and Townsend noted white pelicans in the Columbia in the 1830s, and said that in spring, "they retire inland to breed" (Jobanek and Marshall 1992). As described in the Population Status section, historical information from the 19 th and early 20 th century is limited, but clearly indicates that white pelicans nested at Moses Lakes, and perhaps Sprague and a few other lakes (Dawson and Bowles 1909, Jewett et al. 1953). The first published record of nesting is from 1926 at Moses Lake, Grant County (Brown 1926); that colony may have persisted into the 1930s. Kitchin (1934) states, "breeds in eastern Washington (commonly at Moses lake)," but there are otherwise no definite records from that period (Motschenbacher 1984). Motschenbacher (1984) noted that a long-time resident recalled that up to ~500 pelicans were present seasonally on Moses Lake from 1902 until the 1940s, and he listed 4 additional sites

where conditions were suitable and pelicans may have once nested. Dawson and Bowles (1909) stated, "Concerning their nesting in Washington, nothing has been preserved; but it is fair to suppose that they have bred, at least until recently, on Moses and Colville Lakes." However, between being shot, colony disturbance, wetland losses, and later, DDT, pelicans declined dramatically nation-wide in the 20th century, and were extirpated as a breeder in Washington from the 1940s until 1994. The Seattle Audubon Society shows in a map that the white pelican is not a traditional resident species overall, as populations breeding west of the Rocky Mountains "typically move south to California and the west coast of Mexico." Also, there is a scarce presence in Washington during their migration to begin with, while "[s]mall numbers of non-breeding American White Pelicans remain in eastern Washington throughout the year." Seattle Audubon's Birdweb site has a simple outdated (mid-20th century) North American range map for the species (link below), evidently based on data prior to the pelicans re-establishing themselves as a breeder here 20 years ago. The map shows white pelican's presence in Washington as 'migration (scarce)', and doesn't claim to portray the historical record. The information is correct that white pelicans are a migrant, and much smaller numbers are present during winter, with most moving south. Much more useful and accurate is their map of Washington indicating the seasonal presence of white pelicans, and the year-round presence near the Badger Island colony (note: the indication of breeding at Sprague Lake is not based on confirmed information that we are aware of). (map at http://www.birdweb.org/birdweb/bird/american white pelican#) You use a greatly outdated and provably inaccurate overall population estimate of 157,000 during the period of 1998-2001. This information is so outdated as to be of no real scientific value. Why no current estimate? It's obviously a heck of a lot higher.... The 1998-2001 total is the most recent continent-wide estimate; the Breeding Bird Survey trend index (Fig. 3) suggests they have increased substantially since then, but there has been no comprehensive range-wide survey effort. The 2014 tally for western colonies was 42,692 (Table 1). White pelicans are not a high priority for surveys in most states and provinces, hence range-wide estimates were infrequently updated. However, the Pacific Flyway Council (2013) has outlined a schedule for monitoring western colonies every three years. The other population center of white pelicans in Washington is in the Columbia River estuary on Miller Sands Spit, which hosted a colony of 144 nests in 2015. Furthermore, this particular colony's area, as well as shorelines of water bodies used by pelicans for most of their foraging, is regulated by the Department of Ecology under the Shoreline Management Act. Miller Sands is in Oregon, and therefore not protected under the Shoreline Management Act, a Washington regulation. Although access is theoretically

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Factors Affecting White Pelicans in Washington	restricted, human intruders camped near the pelicans' colony in 2014, causing flightless young to abandon the colony. Many were rescued from the water by researchers and taken to a rehab facility (see Human disturbance) The species has been federally delisted since 1987, and Washington's continued listing of this species (despite being a state that doesn't even enjoy being within the species' main migratory route) can hardly be said to have been the only force upholding the resurgence and explosion of the white pelican species around the country. The American white Pelican was never listed under the federal ESA. As mentioned under Range-wide population status, Sloan (1982) suggested that they should be listed as threatened, but they were never formally petitioned, or listed.
	Since the Badger Island colony has become the fourth largest western colony, and the birds from Stum Lake, BC, likely migrate through the area, Washington is considered to be within the species' migratory route.
	It is only a matter of time before the white pelican population (considering it is growing at an incredible rate) starts causing <i>serious</i> damage to the smolt populations in the Columbia Basin. There is only passing reference to the growing problem of more than 1,000 of these large predators on the Yakima River between the mouth and the dam at Parker. The Yakima River is subject to low flows and excessive temperatures during periods of salmon (endangered) smolt presence and migration. What studies have you conducted looking for evidence of high predation losses by the pelican on this section of this water? Where is your PIT data for the Yakima? How smart is it to spend millions hatching smolt to feed this ravenous predator?
	The impacts of the fish-eating birds in the Columbia River system has been a subject of investigation for >20 years. As discussed in Fisheries conflicts, all the data (including PIT data) suggest that Caspian Terns and Cormorants and more important predators of smolts than the Badger Island white pelican colony. Pelicans prefer larger prey such as carp, suckers, and pikeminnows. Yakima River Summer and Fall Chinook, the smolts that most often fall prey to pelicans (based on PIT tags found on the colony), are not ESA-listed. Nonetheless, they may be taking a significant number of smolts at certain places and times on the Yakima, which may require management action in the future to discourage them. Pelicans are very conspicuous and may receive more than their share of blame for predation on smolts and fish of recreational value.
	This bird represents a threat to human life and property destruction via bird strike on commercial and general aviation aircraft. Migrating geese are another issue, but they tend to stay below 2500 feet and often travel in larger flocks more easy to detect and avoid. Please consider this issue when contemplating protection of this species.
	Of 151,267 bird strikes on U. S. civilian aircraft in the 25 years from 1990-2014, there were 16 involving white pelicans (Dolbeer et al. 2015). Although extremely rare, strikes involving pelicans are extremely dangerous because of their large size. Nonetheless, this record compares with 4,675 strikes involving ducks, geese, or

	swans, >10,000 involving raptors (eagles, hawks, falcons, owls), and >10,000 involving gulls. We do not believe that conservation considerations for pelicans should be diminished or eliminated over this issue, but neither should bird strike hazard mitigation near airports be compromised for concern about pelican populations.
Conclusion and recommendation	You acknowledge that populations have recovered substantially yet conclude they are still vulnerable. What evidence is there of that, and what would cause mass mortality under present conditions? They have grown from first observation in the early 1990's to over 100,000, a rapid, sustained growth. I see no real threats to this bird that can be reasonably anticipated. I support a downgrading all the way to removal on the State and Federal lists. It cannot be said that this species is likely to become endangered "within the foreseeable future" either. Between the 1960s and 1980, the number of known breeding colonies went from 43 to 55, and population of breeding white pelicans went from 63,000 to 109,000. The National Audubon entity actually supports the assertion that their health as a species is optimistic, pointing out that the white pelican population has experienced a "substantial increase since 1970s." The International Union for Conservation of Nature ("IUCN") finds the condition of the species to be of the least concern.
	The numbers mentioned, and the conservation status terms used by national and international organizations refer to the entire continental population. This comment confuses the continent-wide numbers (>157,000) with Washington's population of ~3,200 breeding adults. The Washington listing rule (WAC 232-12-297) refers to only the status of the species in Washington. Washington hosts only one colony, and white pelican nesting colonies are very sensitive. Disturbance by predators or humans could result in colony abandonment and extirpation as a breeding species in Washington. Diseases, including West Nile Virus and Type C botulism have caused multiple mortality events (e.g. 9,000 and 8,500 deaths) in the last 20 years. White pelicans were also persecuted historically by fishermen, although they most often feed on non-game fish such as suckers and carp.
	I believe the white pelican should be kept on the endangered list because it is easily disturbed by humans and predators, and at risk to changes in water levels.
	Comment noted. The species is sensitive to disturbance and can be affected by water level changes. However, white pelicans have been steadily increasing for ~20 years in Washington and regionally. For these reasons, their status is more consistent with 'threatened', as defined in the WAC.
	I support revising the protection status of the American White Pelican to "threatened". They appear to have few threats to their existence in Washington, and their numbers have increased markedly.
	Comment noted.
	WDFW has rightfully proposed a down-listing of the white pelican on the state ESA, as the species can't reasonably be considered endangered in a scientific or

legal sense any longer. The white pelican no longer fits the definition of endangered, or threatened, or even sensitive in the state of Washington based on the definitions provided by WAC 232-12-297. Not only is this population increasing, but it is entirely protected by federal regulation, as the island happens to be situated within the McNary National Wildlife Refuge, thus falling under the egis of the FWS. The national wildlife refuge status of Badger Island provides some protection, but completely eliminating the potential for trespass on an uninhabited island is impossible, as demonstrated by the disturbance of the Miller Sands, Oregon, colony. Redundant federal/state protections can provide more than one option for prosecution, which can be an advantage, and state and federal laws often provide parallel prohibitions. [In regards to the WAC definitions of threatened and sensitive, see the response to the next comment.] 'Sensitive' is defined in WAC 232-12-297 as a species "native to the state of Washington that is vulnerable or declining and is likely to become endangered or threatened in a significant portion of its range within the state without cooperative management or removal of threats." As is very clear, even this relaxed statutory definition does not reasonably apply to a species that is increasing in both population size and overall health in the state of Washington, and around the entire country. It seems as though the WDFW is under the misguided impression that a species must be down-listed sequentially, occupying all three tiers before full delisting approval. There is no such requirement. Agreed, there is no requirement that down-listing be incremental through each step. We considered down-listing to sensitive or delisting white pelicans. However, Section 4.2 states, "A species may be delisted from endangered, threatened, or sensitive only when populations are no longer in danger of failing, declining, are no longer vulnerable". There is only 1 colony in Washington, and colonies are prone to abandonment if disturbed by humans or predators, and major disturbances to the Badger Island colony could lead to the extirpation of the species as a breeder in Washington. Given this situation, along with the history of persecution, we interpret this species status as being at least 'vulnerable.' We will revisit their listing status in five years.

WASHINGTON STATE STATUS REPORTS, PERIODIC STATUS REVIEWS, RECOVERY PLANS, AND CONSERVATION PLANS

Status Reports Periodic Status Reviews		lic Status Reviews	
2015	Tufted Puffin	2016	Taylor's Checkerspot
2007	Bald Eagle	2016	Columbian White-tailed Deer
2005	Mazama Pocket Gopher,	2016	Streaked Horned lark
	Streaked Horned Lark, and	2016	Killer Whale
	Taylor's Checkerspot	2016	Greater Sage-grouse
2005	Aleutian Canada Goose	2016	Northern Spotted Owl
2004	Killer Whale	2016	Snowy Plover
2002	Peregrine Falcon	2016	Western Gray Squirrel
2000	Common Loon	2015	Brown Pelican
1999	Northern Leopard Frog	2015	Steller Sea Lion
1999	Olympic Mudminnow		
1999	Mardon Skipper	Recov	ery Plans
1999	Lynx Update	2012	Columbian Sharp-tailed Grouse
1998	Fisher	2011	Gray Wolf
1998	Margined Sculpin	2011	Pygmy Rabbit: Addendum
1998	Pygmy Whitefish	2007	Western Gray Squirrel
1998	Sharp-tailed Grouse	2006	Fisher
1998	Sage-grouse	2004	Sea Otter
1997	Aleutian Canada Goose	2004	Greater Sage-Grouse
1997	Gray Whale	2003	Pygmy Rabbit: Addendum
1997	Olive Ridley Sea Turtle	2002	Sandhill Crane
1997	Oregon Spotted Frog	2001	Pygmy Rabbit: Addendum
1993	Larch Mountain Salamander	2001	Lynx
1993	Lynx	1999	Western Pond Turtle
1993	Marbled Murrelet	1996	Ferruginous Hawk
1993	Oregon Silverspot Butterfly	1995	Pygmy Rabbit
1993	Pygmy Rabbit	1995	Upland Sandpiper
1993	Steller Sea Lion		
1993	Western Gray Squirrel	Conservation Plans	
1993	Western Pond Turtle	2013	Bats

 $\frac{Status\ reports\ and\ plans\ are\ available\ on\ the\ WDFW\ website\ at:}{\underline{http://wdfw.wa.gov/publications/search.php}}$

