



## EUREKA COUNTY BOARD OF COMMISSIONERS

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June 6, 2014

Honorable Sally Jewell  
Secretary of the Interior  
US Department of the Interior  
1849 C Street NW  
Washington DC, 20240

RE: Petition to delist the Common Raven from the Migratory Bird Treaty Act

Dear Secretary Jewell:

As you know, predation by the common raven is a major threat to the Greater Sage Grouse (GSG); primarily predation on nests and young chicks. This is well documented in the scientific community and there have been many peer-reviewed studies, many in Nevada, documenting this fact. Yet, the common raven is protected through its listing on the Migratory Bird Treaty Act (MBTA). While we acknowledge that there are take permits granted to allow use of avicides and other means to manage ravens, the permitted control measures and take allowed are severely limited and are not effective in controlling the exploding populations of ravens across GSG habitats in the west.

This letter serves as a petition to you by this Board to remove the common raven from protection under the MBTA. Doing such would allow effective control of ravens to release major unnatural predator pressure on these imperiled birds. We believe this removal of ravens from the MBTA can be done is an effective way that ensures the viability of ravens while improving the viability of GSG and communities such as ours that rely on sustainable use of the land and its resources that would be endangered by an ESA listing of the GSG.

The time to act on this matter is now. We have faith in your leadership to address this issue and see it through.

Respectfully,

  
J.J. Goicoechea DVM, Chairman  
Eureka County Board of Commissioners

cc: Governor Brian Sandoval  
Nevada Congressional Delegation  
Nevada Sagebrush Ecosystem Council  
Nevada Dept. of Wildlife  
All Nevada State Legislators  
All Nevada Boards of County Commissioners