



**Board of County Commissioners  
Nye County  
Pahrump, Nevada**

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April 30, 2014

Honorable Sally Jewell  
Secretary of the Interior  
United States Department of the Interior  
1849 C Street NW  
Washington, NC 20240

RE: Request for Delisting of the Common Raven from the Migratory Bird Treaty Act to Protect the Greater Sage Grouse

Dear Secretary Jewell;

The Nye County Board of Commissioners believes the Greater Sage Grouse (currently under consideration for listing under the ESA) is severely negatively impacted by common raven predation. As much as 94% of all sage grouse nest failures in northern Nevada are caused by depredations and of those, 46.7% are directly attributable to the common raven. Because of their keen eyesight and intelligence, ravens are deadly and efficient predators of sage grouse nests. We understand the use of DRC-1339 ("Starlicide") treated eggs is an effective management tool when used as part of an overall program to control burgeoning raven populations. Unfortunately, the number of treated eggs and other permitted control measures are severely limited because the raven has been listed in the on the Migratory Bird Treaty Act.

Nye County Resolution 2014-02 (enclosed) requests the delisting of the common raven from the Migratory Bird Treaty Act so an effective predator control program can be properly implemented. We believe the raven will continue to thrive without the protections of the Migratory Bird Treaty Act and therefore respectfully request that you order the US Fish and Wildlife Service to immediately remove the raven from the list. We firmly believe this to be a prudent and appropriate measure to ensure the viability of Greater Sage Grouse populations and remove the consideration of ESA designation.

Sincerely,

Dan Schinhofen, Chair  
Nye County Board of Commissioners

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Enclosures

cc w/encls: Governor Brian Sandoval  
US Senator Harry Reid  
US Senator Dean Heller  
US Congressman Mark Amodei  
US Fish and Wildlife Service  
US Bureau of Land Management  
US Forest Service  
Nevada State Senator Pete Goicoechea  
Nevada State Assemblyman James Oscarson  
Nevada State Assemblyman Ira Hansen  
Nevada Department of Wildlife  
Governor's Sagebrush Ecosystem Council  
Nevada Association of Counties  
All Nevada State Legislators  
All Counties in the State of Nevada  
Cassia County, Idaho  
Box Elder County, Utah  
Te-Moak Tribe of Western Shoshone  
Elko Band Council  
South Fork Reservation Council  
Wells Band Council  
Battle Mountain Band Council  
Farm Bureau  
Nevada Cattlemen's Association  
Nevada Mining Association  
Nye County Advisory Board to Manage Wildlife

1 **NYE COUNTY RESOLUTION NO. 2014-02**

2 **A RESOLUTION DECLARING THE COMMON RAVEN A NUISANCE AND THREAT TO THE**  
3 **HEALTH, SAFETY AND WELFARE OF THE PEOPLE OF NYE COUNTY**

4 **WHEREAS, the effect of having the sage grouse listed as an endangered species will cost the**  
5 **economy of Nye County hundreds of millions of dollars and thousands of jobs; and**

6 **WHEREAS, predator control is the most effective strategy in protecting the sage grouse**  
7 **population and has the least impact on human development and activity necessary to sustain the health,**  
8 **safety and welfare of society; and**

9 **WHEREAS, the U.S. Fish and Wildlife Service (USFWS) previously listed threats to the sage**  
10 **grouse and placed predation, including ravens, as number "twelve" on its list of threats. Common**  
11 **knowledge and recent studies establish that ravens and fire are the greatest threats to sage grouse and**  
12 **should be listed as numbers "one" and "two" on the list of threats to sage grouse; and**

13 **WHEREAS, a recent scientific study conducted in a portion of northern Nevada concluded that**  
14 **depredation accounted for 82.5% of the nest failures of sage grouse (Lockyer et al. 2013); and**

15 **WHEREAS, another study concluded that nest depredation represents approximately 94% of**  
16 **sage grouse nest failures (Moynahan et al. 2007); and**

17 **WHEREAS, ravens are responsible for 46.7% of sage grouse nest depredations in northern**  
18 **Nevada (Lockyer et al. 2013); and**

19 **WHEREAS, the same study also concluded that an increase in one raven per 10 km2 was**  
20 **associated with a 7.4% increase in probability of Greater Sage Grouse nest failure in parts of northern**  
21 **Nevada (Lockyer et al. 2013); and**

22 **WHEREAS, in addition to depredation on sage grouse, ravens prey on and consume the eggs and**  
23 **the young of song birds and other species during the nesting season; and**  
24

1 WHEREAS, ravens have been observed attacking and pecking out the eyes of newborn calves,  
2 lambs and other livestock, particularly during or shortly after birth, causing loss of valuable livestock;  
3 and

4 WHEREAS, because of their tendency to scavenge, ravens are known to carry and spread  
5 diseases, including West Nile Virus, fungi, and Mad Cow Disease, that are a serious threat to humans,  
6 livestock, and wildlife; and

7 WHEREAS, raven population sizes, densities and distributions have increased substantially  
8 across the western United States. Ted Koch, head of the USFWS for Nevada, confirmed that the raven  
9 population in Nevada has increased by 600% in the last ten years;

10 NOW, THEREFORE BE IT RESOLVED, that the common raven be declared a nuisance and a  
11 threat to the health, safety and welfare of the people, livestock, and wildlife of Nye County.  
12

13 APPROVED this 4<sup>th</sup> day of February, 2014

14 NYE COUNTY BOARD OF  
15 COUNTY COMMISSIONERS:

ATTEST:

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17 \_\_\_\_\_  
18 Dan Schinshofen, Chairman

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17 \_\_\_\_\_  
18 Sandra L. Merlino, Nye County Clerk  
19 And Ex-Officio Clerk of the Board  
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