Board of County Commissioners
Nye County
Pahrump, Nevada

Pahrump Office
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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

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NYE COUNTY RESOLUTION NO. 2014-02

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

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

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

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

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

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

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

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

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

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

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

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

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

APPROVED this 4th day of February, 2014

NYE COUNTY BOARD OF COUNTY COMMISSIONERS:

Dan Schinhofen, Chairman

ATTEST:

Sandra L. Merlino, Nye County Clerk
And Ex-Officio Clerk of the Board