

April 28, 2014

Dan Ashe  
Director  
U.S. Fish and Wildlife Service  
Washington, D.C. 20240

Dear Director Ashe,

We understand that U.S. Fish and Wildlife Service (USFWS) has approved the use of lethal measures (poison or shooting) of up to 4,000 Common Ravens in the State of Idaho via the issuance of a scientific collection permit. This permit was provided for a 2-year “study” to evaluate the effectiveness of “raven control” to increase Greater Sage-Grouse numbers in Idaho, as described in a supplemental [Environmental Assessment](#) (EA) prepared by the US Department of Agriculture, Wildlife Services as the lead federal agency, in partnership with Idaho Fish and Game.

The undersigned conservation groups request that you carefully review the basis for issuing this permit and strongly consider revoking it, as well as any other Migratory Bird Treaty Act permits that allow federally-protected Common Ravens to be killed in these numbers. Idaho’s proposed “raven control” program:

- 1) Conflicts with [the west-wide Sage-Grouse conservation planning initiative](#), which the [US Fish and Wildlife Service](#) has strongly supported,
- 2) Addresses a low-priority threat rather than real problems facing Greater Sage-Grouse,
- 3) [Lacks the design of a credible scientific investigation](#), and
- 4) Has not received the appropriate level of analysis as required by your agency under the National Environmental policy act (NEPA).

The [USFWS’ own 2013 Conservation Objectives Team Report](#) ranks predation (by all predators, not just ravens), as threat number 17 (out of 18) to Greater Sage-Grouse populations. [A USGS review](#) of science regarding threats to Greater Sage-Grouse populations concludes: “there is little published support for predation being a limiting factor in sage-grouse populations.” These two documents represent comprehensive reviews of the best available science to support Greater-Sage Grouse conservation and management. They both list habitat loss, degradation, and fragmentation due to energy development, exurban growth, invasive exotic vegetation, and poor range management as critical limiting factors for Sage-Grouse population persistence. These two documents lay out specific strategies for dealing with major threats that could actually make a difference for Sage-Grouse.

Given the questionable conservation benefits of raven control, the poor scientific design of the proposed “study” in the EA, the use of a poison bait ([DRC-1399](#)) with a documented history of causing mortality to non-target predators, and the spiritual value of Common Ravens to many cultures, we seriously question the validity of the categorical exclusion that was used to issue a Scientific Collection permit to support this action as well as the rigor of your office’s Biological Review. As raven control is clearly in opposition to the best available science, and in violation of the Migratory Bird Treaty Act, we suggest that USFWS’ should not be issuing permits to support this activity.

Idaho’s raven control plan is opposed by the conservation groups listed below and signatures from [>20,000 individuals](#). We believe that the Department of Interior and USFWS can do much better than

this. We encourage DOI and USFWS to embrace the collaborative conservation planning process that both agency directors have proposed to effectively address key threats to Greater Sage-grouse population persistence. Scapegoat actions like “raven control,” which decades of research have demonstrated to be ineffective in large landscapes, waste agency resources and do not lead to lasting benefits for grouse. This type of misguided program should not be enabled by the USFWS’ issuance of a scientific collection permit and should not be seen as a viable alternative to the types of large-scale land management policy changes that are necessary to support Sage-Grouse populations in perpetuity.

We are aware of similar “raven control” programs in many other states within the range of Greater Sage-Grouse. These programs will always need permission from USFWS for exemption from Migratory Bird Treaty Act violations. Since many of these permits are issued at the scale of local or regional field offices, we suggest that USFWS develop a rigorous and transparent agency-wide policy on the issuance of raven control permits that better reflects the agency’s commitment to using the best available science to support range-wide conservation planning. It may help for the agency to issue a policy statement that these programs do not address priority threats and are unlikely to provide enough benefit to Greater Sage-Grouse population to keep the species off the federal Endangered Species List.

Sincerely,

Dr. George Fenwick, President, American Bird Conservancy, Washington, D.C.

Michele Crist, President, Golden Eagle Audubon Society, Boise, Idaho

Travis Bruner, Executive Director, Western Watersheds Project, Hailey, Idaho

Denise Boggs, Executive Director, Conservation Congress, Livingston, Montana

Dave Willis, Chair, Soda Mountain Wilderness Council, Ashland, Oregon

Joann Thomas, President, Fort Collins Audubon Society, Fort Collins, Colorado

Ron Harden, Foothills Audubon Club of Colorado, Loveland, Colorado