From: Deibert, Pat
To: Bush, Jodi
Cc: Brent Esmoil; Jeff Berglund
Subject: Re: May 8 Raven Control Letter & Follow Up Request
Date: Friday, May 09, 2014 11:57:22 AM
Attachments: image001.png

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if it helps, this is a research permit, not a strict depredation permit.

On Fri, May 9, 2014 at 11:53 AM, Bush, Jodi <jodi_bush@fws.gov> wrote:

So this is pretty disconcerting. We had huge lengthy discussions with our MT folks working on the State Conservation Strategy who were also pointing to predation as being the primary reason for sage grouse population reductions. We won that argument (eventually) but maybe only until and if this permit is allowed. We should take the opportunity to make sure the folks issuing this permit know that this sets a huge precedent that would be very harmful to conservation management across the range of the sage grouse. Can our RO make sure R1 is aware? If you haven't already. Thanks. JB

Jodi L. Bush
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---------- Forwarded message ----------
From: **Steve Holmer** <sholmer@abcbirds.org>
Date: Thu, May 8, 2014 at 1:43 PM
Subject: May 8 Raven Control Letter & Follow Up Request
To: "robyn_thorson@fws.gov" <robyn_thorson@fws.gov>

AMERICAN BIRD CONSERVANCY
Shaping the future for birds

May 8, 2014

Robyn Thorson

Regional Director

U.S. Fish and Wildlife Service

Portland, OR 97266

Dear Regional Director Thorson,

The attached letter was recently sent to USFWS Director Dan Ashe opposing issuance of a scientific collection permit to USDA-Wildlife Services to kill ravens for a two-year study to understand if raven control might help Sage Grouse populations in Idaho. The letter raises concern about the validity of the biological review regarding the issuance of this permit. Also attached to this email are the official comments that two Idaho conservation groups sent to APHIS, in response to their draft EA, that question the validity of calling this predator control action a “study” and a letter to APHIS asking for the project to be halted.

USFWS has thoroughly reviewed predator impacts on Sage Grouse multiple times and concluded that predators are not a range-wide threat to Sage-Grouse and that predator control has a low probability of positively affecting Sage Grouse populations.

In the March 3, 2010 12-Month finding on the petition to list Greater Sage-Grouse as threatened or endangered in the Federal Register, USFWS concluded: “based on the best scientific and commercial information available, we conclude that predation is not a significant threat to the species…” (p.13973). This position is reiterated on page 11 of the March 22, 2013 final draft of USFWS’ Greater Sage-Grouse Conservation Objectives Report, transmitted with Dan Ashe’s signature with the statement: “Though threats such as infectious diseases and predation may be significant at a localized level, particularly if habitat quantity and quality is compromised, they were not identified by FWS as significant range-wide threats in our 2010 warranted finding (75 FR 13910).”

We are unclear how this agency position is consistent with Region 1’s issuance of permits for raven control in Idaho, and

other western states where this has been pursued. Given the limited nature of predator impacts on Sage-Grouse populations and the questionable short-term benefits of predator control in both USFWS' and USGS' range-wide science reviews for Sage-Grouse, we disagree with the statement made by USFWS in a May 5, 2014 article in E&E news that: "the purpose of this proposal is to conduct an analysis of whether removal of ravens is an effective management tool." It appears to us that this question has already been asked and answered and thoroughly reviewed by USFWS and other scientists. For this reason, it seems inadvisable to issue USDA-Wildlife Services a "scientific collection permit" to authorize raven control.

We strongly encourage USFWS' leadership in Region 1 to re-examine the biological review that justified issuance of the USDA permit. We further encourage FWS to 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. FWS could take a positive first step toward this goal by revoking the "scientific collection permit" issued to USDA-Wildlife Service in Idaho to conduct this work.

We would appreciate clarification in writing about how issuing this permit is consistent with USFWS' major initiatives for range-wide conservation planning for Sage-Grouse and what information was used to determine that additional "study" of the effectiveness of raven control was necessary. Thank you for your time and for considering this request.

Sincerely,

Steve Holmer

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Steve Holmer

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