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May 21, 2014

Honorable Sally Jewell
Secretary of the Interior
United States Department of the Interior
1849 C Street, N.W.
Washington DC 20240

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

Dear Secretary Jewell:

The Box Elder County Commissioners believe the Greater Sage-Grouse population, currently under consideration for listing under the Endangered Species Act, is severely impacted by common raven predation.

According to a 2010 Journal of Wildlife Management report based on a study conducted by Peter S. Coates and David J. Delehanty, "raven abundance has increased an estimated 300% in the past 27 years in the United States (Sauer et al. 2008), including reports of 1,500% increases within an approximately 25-year period in areas of the western United States (Boarman 1993)" (Coates and Delehanty 2010).

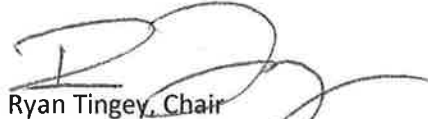
In this study they found that 42.5% of sage-grouse nest failure rate was attributed to depredation, and "an increased index value of one observed raven...was associated with an approximately 7.4% increase in the odds of nest failure..." In a more recent study (Lockyer et al. 2013), depredations accounted for 82.5% of nest failures with ravens responsible for 46.7%. Coates and Delehanty recommend that "...sage-grouse nest survival would increase from well-designed raven management strategies."

The use of DRC-1339 treated eggs is an effective management measure in an overall program to control the growing raven population. Unfortunately, the permitted number of treated eggs and other permitted control measures are severely limited due to the raven listing on the Migratory Bird Treaty Act.

The Box Elder County Commission requests the delisting of the common raven from the Migratory Bird Treaty Act so an effective predator control program may be implemented in Box Elder County. We have no doubt the ravens will continue to thrive without this protection and therefore respectfully request that you order the U.S. Fish and Wildlife Service to remove the raven from the list.

We sincerely believe this to be a prudent and appropriate measure to ensure the viability of the Greater Sage-Grouse populations and to remove them from consideration of Endangered Species designation.

Respectfully,



Ryan Tingey, Chair
Box Elder County Commission



Stan Summers
Commissioner



Jeff Scott
Commissioner

cc:

Governor Gary Herbert
US Senator Orrin Hatch
US Senator Mike Lee
Congressman Rob Bishop
Congressman Jason Chaffetz
Congressman Jim Matheson
US Fish and Wildlife Service
US Bureau of Land Management
US Forest Service
Utah State Senator Peter Knudson
Utah Representative Ronda Menlove
Utah Representative Lee Perry
Utah Department of Agriculture and Food
Utah Farm Bureau
Elko County, Nevada