

SENT VIA TELEPHONE FACSIMILE ONLY

State Director
USDA APHIS Wildlife Services
9134 W. Blackeagle Drive
Boise, ID 83709
FAX (208) 378-5349

Re: Comments on Wildlife Service's Supplement to the Environmental
Assessment: Predator Damage Management in Southern Idaho

To Whomever It May Concern:

1. My name is Clait E. Braun, and I reside in Tucson, Arizona.
2. I have a B.S. in Technical Agronomy from Kansas State University, a M.S. in Wildlife Management from the University of Montana, and a Ph.D. in Wildlife Biology from Colorado State University. In addition, I have attended numerous short courses, workshops, technical sessions, etc., to remain current in my professional work and am a Certified Wildlife Biologist.
3. I was a Research Wildlife Scientist, Wildlife Research Leader, and Avian Program Manager for the Colorado Division of Wildlife during 1969-99. In addition, I taught as an Instructor at the University of Montana (1963-65) and Colorado State University (1966-69), and have been an invited lecturer at more than 20 U.S. and Canadian universities. I also worked as a Soil Scientist in Montana (1964) and Kansas (1961) for the U.S.D.A, Soil Conservation Service and as a Research Technician with the Montana Department of Fish and Game (1965).
4. My field research was primarily on different species of birds, especially grouse (1965-2013). I specifically conducted and directed research on sage-grouse (*Centrocercus* spp.) throughout Colorado from 1973 through 1999.

My research on sage-grouse has caused me to review sagebrush-steppe ecosystems (plants and animals) throughout all western states and provinces. This research has led to more than 300 scientific publications, mostly in peer-reviewed journals. A copy of my biographic sketch is attached.

5. I served on the National Advisory Committee for Wildlife Services (USDA, APHIS) during 1999-2005 as Vice Chair and Chair, and during 2008-2009 as Chair.

6. I thoroughly reviewed Wildlife Services' Supplement to the Environmental Assessment: Predator Damage Management in Southern Idaho, dated March 2014, as well as appropriate scientific papers.

General Conclusions

a. The proposed common raven (*Corvus corax*) control effort to increase protection (recruitment) of sage-grouse (*Centrocercus urophasianus*) as measured by counts of males on leks through improved nest success and chick survival of sage-grouse over a 2-year interval (2014-2015) is without merit as no benefit to recruitment of breeding populations of the species is expected and none will be able to be demonstrated. Further, such benefit has not been demonstrated for any wild population of Galliformes (*Phasianidae: Tetraoninae*).

b. The proposed common raven control action is not well designed nor scientifically supported, especially because the project lacks scientific controls and no scientific way to measure success of the project. Due to the failures in the design of this project, no tenable scientific data will be gathered. Indeed, it

appears that this project represents nothing more than Wildlife Services' efforts to indiscriminately kill over 4,000 ravens, and to shift the blame on sage-grouse declines away from habitat degradation (from energy development, infrastructure, weeds, fire, and livestock grazing, etc.) and towards predation. But, in its recent listing rule concluding that sage-grouse warrant protection under the Endangered Species Act, the U.S. Fish and Wildlife Service (USFWS) did not include predation as a major factor of concern for maintenance of populations of greater sage-grouse.

c. This proposal avoids any mention of the devastating actions by public land management agencies in failing to properly manage habitats useful to sage-grouse on public lands.

d. This project should be expected to pass stringent tests of scientific justification and compelling logic. Unfortunately, it fails those tests.

Specific Comments

a. The goal of the proposed action is to assess the efficacy of common raven removal to aid in protection and restoration of sage-grouse populations. No data are presented that raven predation of eggs or young of sage-grouse are related to the decline in the long-term trend in sage-grouse counted on leks in Idaho. No data are presented that removal of ravens will increase numbers of sage-grouse counted on leks in Idaho nor are data presented to indicate that removal of ravens has increased the numbers of sage-grouse counted on leks anywhere. Please present all data supporting Wildlife Services' underlying premise that raven predation of sage-grouse eggs or young is related to the decline of sage-grouse in Idaho.

b. Common ravens and many other species have been documented to eat sage-grouse eggs. The specific impact of common raven predation on sage-grouse nest success and survival of chicks is unknown, despite a modeling study in Nevada. The available data do not suggest that removal of common ravens will increase counts of sage-grouse on leks in year 1 (2014) or year 2 (2015). Indeed, the recent paper by Robinson and Messmer (2013, Human-Wildlife Interactions) indicated that sage-grouse survival rates, nest success, and brood success were greater in an area receiving less intense predator control and no raven control compared to an area with more overall predator control and raven removal.

c. The data that suggest that numbers of common ravens are increasing are based on estimates and not on replicated distance sampling. Thus, the estimated common raven densities are likely biased high.

d. No evidence is presented to eliminate other predators or other causes (habitat loss, fragmentation, degradation) as being involved in the declines in sage-grouse counted on leks in Idaho.

e. The Idaho Conservation Plan for Greater Sage-grouse (Appendix A) does not recommend predator control unless nest success of sage-grouse is less than 25% or survival of adult hens is less than 45%. Their data suggests that sage-grouse nest success and survival of adult hens currently exceeds these rates, and Wildlife Services provides no rationale or reason to undertake predator control in this situation. The USFWS in their 2010 ruling did not find that predation was a major threat to stability of greater sage-grouse populations. The USFWS ruling found the most immediate threats to greater sage-grouse were (1)

inadequacy of existing regulatory mechanisms, and (2) present or threatened destruction, modification or curtailment of habitat of the species.

f. Elevated platforms are suggested as a method to make eggs containing DRC-1339 available to common ravens. This methodology may also make the avicide available to non-target avian species, and Wildlife Services never examined this potential cumulative impact in its environmental assessment. Moreover, it appears that Wildlife Services intends to use DRC-1339 in direct contravention of the limitations including in the pesticide registration label.

g. The scientific literature (Cote and Sutherland 1997; reviewed by Hagen 2011) has discredited the premise that predators adversely affect bird populations including sage-grouse nesting success and recruitment. Again, Wildlife Services never examines this scientific information in its environmental assessment.

h. The methodology does not suggest Wildlife Services took a hard look at impacts and purposes of the proposed action.

Conclusions

I have spent much of my career designing and implementing scientific studies designed to gather reliable, informed, and replicable scientific information on greater sage-grouse populations, trends, and habitat conditions. The Wildlife Services' proposed raven killing 'experiment' fails to meet the most basic elements of scientific investigation, and will produce no reliable, informed, or replicable data on the impacts of raven populations on sage-grouse nests and recruitment. Moreover, the proposed protection effort will not be able to

demonstrate any benefits to sage-grouse, it is controversial in terms of use of DRC-1339 because of potential effects on non-target avian species, and the entire project requires a more complete and comprehensive review. This project is unprofessional, indefensible, any results will not be credible, and there is no real science involved. No benefits to sage-grouse will be documented based on science (as there is no science).

/s/ Clait Braun
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Joani Walsh, Deputy Under Secretary for Marketing and Reg. Programs,
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BIOGRAPHICAL SKETCH

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Born: 4 October 1939, Kansas City, Missouri, USA

Academic Training

B.S. 1962. Technical Agronomy, Kansas State University, Manhattan
M.S. 1965. Wildlife Management, University of Montana, Missoula
Ph.D. 1969. Wildlife Biology, Colorado State University, Fort Collins

Experience (50 years of study of species of grouse, including Sage-Grouse)

Director, Grouse Inc., Tucson, AZ (2000-Present)
Avian Research Program Manager, Colorado Division of Wildlife
Wildlife Research Leader-Avian, Colorado Division of Wildlife
Soil Scientist, Soil Conservation Service, USDA, Kansas and Montana

Memberships

The Wildlife Society

Editor (*Journal of Wildlife Management*) (1981-83)

Vice President, President, Past President

Charter and Founding Member of Colorado and Montana Chapters

Editor, Sixth Edition, *The 'Techniques Manual'* (2005)

Fellow

The Wilson Ornithological Society

Elected Board Member, Vice President, President

Life Member

Editor (*Wilson Journal of Ornithology*) (2007-2012)

Colorado-Wyoming Academy of Science

Elected Board Member, Treasurer, President, Life Member

American Ornithologist's Union

Elected Member, Elected Fellow, Life Member

Cooper Ornithological Society: Life Member

American Society of Mammalogists: Life Member

Great Plains Natural Science Society: Life Member

American Association for the Advancement of Science (1969-2014)

American Men and Women of Science

Who's Who in the West

Personalities of the West and Midwest

Dictionary of International Biography

Professional Achievement Awards

Colorado State University
Colorado-Wyoming Academy of Science
Gunnison Sage-Grouse Stewardship Award
The Wildlife Society (Chapter, Section, National)
U.S. Department of Agriculture (SCS)
Western Agencies Sage & Columbian Sharp-tailed Grouse Technical Committee
---Robert L. Patterson Award
Wilson Ornithological Society---Klamm Award

Publications

Over 300 Technical Articles (especially on grouse) published in Peer-reviewed and Non Peer-reviewed Journals, Symposia, Proceedings (List Available upon Request)

Referee

Peer Reviewer for 20+ National/International Journals

Technical Editor or Editor

Multiple Books and Proceedings, and Professional International Journals
Most Recent
Greater Sage-Grouse; Ecology and Conservation of a Landscape Species and its Habitats. 2011. Studies in Avian Biology, Number 38. 645 pp.
Quail VII: Proceedings of the Seventh National Quail Symposium: 2012: 386 pp.

Consultant

County (Gunnison, Colorado), State (Nevada, New Mexico, Oregon, Utah, Wyoming), Federal (USFWS), and Provincial (Alberta) governments, and Private Entities (NGO's, Private Ranchers)

Professional Interests

Birds (especially Grouse and Columbids), Habitat Management, Alpine Ecology, Sagebrush-steppe, Population Dynamics

National Advisory Committee, Wildlife Services (USDA, APHIS)

1999-2005, Vice Chair and Chair
2008-2009 Chair

**Publications of Clait E. Braun
1963-2014**

1963

Braun, C. E. and R. D. Taber. 1963. The Missoula hunter: expenditures and bag, 1956-1962. Proceedings of the Montana Academy of Science. 23: Abstract.

1965

Braun, C. E. 1965. A survey of land values directly attributable to waterfowl within the contiguous United States. Thesis. University of Montana, Missoula, USA.

1966

Braun, C. E. 1966. Waterfowl clubs and the economic values of land for waterfowl hunting in the Pacific Flyway. Annual Meeting, Northwest Section, The Wildlife Society 1966: Abstract.

Braun, C. E. 1966. Waterfowl clubs and the economic values of land for waterfowl hunting in the Central Flyway. Transactions of the Central Mountains and Plains Section, The Wildlife Society 11: 3.

1967

Braun, C. E. and G. E. Rogers. 1967. Sex and age determination of white-tailed ptarmigan. Annual Meeting, Northwest Section, The Wildlife Society 1967: 3.

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Braun, C. E., and G. E. Rogers. 1967. Determination of age and sex of the Southern white-tailed ptarmigan. Outdoor Facts, Game Information Leaflet 54. Colorado Division of Game, Fish and Parks, Fort Collins, USA.

Braun, C. E. and W. B. Willers. 1967. The helminth and protozoan parasites of North American grouse (Family: Tetraonidae): a checklist. Avian Diseases 11: 170-187.

Braun, C. E. and G. E. Rogers. 1967. Ecology of the white-tailed ptarmigan in Colorado: a preliminary report. Colorado Field Ornithologist 2: 6-9.

Rogers, G. E. and C. E. Braun. 1967. Ptarmigan. Colorado Outdoors 16(4): 22-28.

Braun, C. E. 1967. The future of public hunting. Colorado Outdoors 16(6): 13-14.

1968

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- Braun, C. E. 1968. Wildlife in Granite County. *In* R. G. Dunmire, J. B. Seago, J. Harchenko, and D. Taylor. Soil survey of the Philipsburg-Drummond area, Montana. U.S. Department of Agriculture, Soil Conservation Service, Washington, D.C., USA.

1969

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Braun, C. E. 1969. Population ecology of white-tailed ptarmigan in Colorado. Transactions of the Central Mountains and Plains Section, The Wildlife Society 14: 12.

1970

Braun, C. E. 1970. Distribution and habitat of white-tailed ptarmigan in Colorado and New Mexico. Proceedings of the Southwestern and Rocky Mountain Division, American Association for the Advancement of Science 46: 35.

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1971

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1972

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1973

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1974

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1975

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- 1976
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(Columba fasciata). Pages 210-245 in G. C. Sanderson, Editor. Management of migratory shore and upland game birds in North America. International Association of Fish and Wildlife Agencies, Washington, D.C., USA.

Keeler, J. E., C. C. Allin, J. M. Anderson, S. Gallizioli, K. E. Gamble, D. W. Hayne, W. H. Kiel, Jr., F. W. Martin, J. L. Ruos, K. C. Sadler, L. D. Soileau, C. E. Braun, and H. D. Funk. 1977. Mourning dove (*Zenaida macroura*). Pages 274-298 in G. C. Sanderson, Editor. Management of migratory shore and upland game birds in North America. International Association of Fish and Wildlife Agencies, Washington, D.C., USA.

Braun, C. E. and E. O. Höhn. 1977. Hormones and seasonal plumage colour in ptarmigan (Aves). Proceedings of The Physiological Society of London 1977: 34-35.

Braun, C. E., J. H. Enderson, C. J. Henny, H. Meng, and A. G. Nye, Jr. 1977. Conservation Committee report, Falconry: effects on raptor populations and management in North America. Wilson Bulletin 89: 360-369.

Höhn, E. O. and C. E. Braun. 1977. Seasonal thyroid gland histophysiology and weight in white-tailed ptarmigan. Auk 94: 544-551.

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1978

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