



May 7, 2007
By Fax and U.S. Mail

U.S. Fish and Wildlife Service
Raven Management Environmental Assessment
Ventury Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, CA 93003
Fax: (805)644-3958
FW8drafravenea@fws.gov
San Diego, CA 92101

Attn: Judy Hohman

Re: Comments on Raven Management Environmental Assessment

Dear Ms. Hohman:

I represent EcoLogic Partners, Inc. (“EcoLogic”), which is a consortium of organizations dedicated to protecting family recreational opportunities throughout the United States. We commend the Bureau of Land Management (“BLM”) and the Fish and Wildlife Service (“FWS”) for researching raven predation of juvenile desert tortoises and for determining that such predation is a serious threat to tortoise recovery. We are likewise pleased that BLM and FWS have developed a rational plan for addressing this threat; it is long overdue.

In reviewing the Environmental Assessment (“EA”) prepared by FWS for the proposed Raven Management Plan, we were struck by its high level of analytical rigor and by the number of alternatives that were evaluated. Although styled as an EA, the document, for all intents and purposes, functions as a full-blown Environmental Impact Statement (“EIS”) and should be treated as such. It meets – and in most cases, exceeds – the NEPA standards for EISs. We applaud FWS for putting together such a strong document.

With respect to the alternatives presented in the EA, we support Alternative B (the preferred alternative) but have some concerns that it may not provide a comprehensive or long-lasting solution to the raven predation problem, which is itself a product of explosive raven population growth. For this reason, we would recommend that FWS opt for Alternative C or D,

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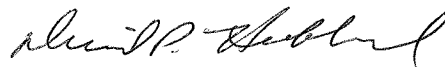
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as these would more aggressively deal with both known and potential sources of raven predation, while still leaving adequate numbers of the birds in place.

Finally, while we accept the fact that lethal means of removing some ravens may be required to effectuate the plan, we at EcoLogic support a graduated approach to raven removal, one where lethal means are used only after non-lethal methods have proved insufficient.

Thank you for this opportunity to comment on this important federal action.

Very truly yours,

A handwritten signature in black ink, appearing to read "David P. Hubbard". The signature is fluid and cursive, with a prominent flourish at the end.

DAVID P. HUBBARD, ESQ.