



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
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IN REPLY REFER TO:
2008-B-0013

May 22, 2008

To: Files

From: Senior Staff Biologist, Desert Division

Subject: Assessment of Public Comments Received on the Finding of No Significant Impact (FONSI) - Implementation of a Desert Tortoise Recovery Plan Task: Reduce Common Raven Predation on the Desert Tortoise

We released the subject FONSI to the public on April 2, 2008 and requested comments by May 9. We received 12 written comments. Six comments were from private citizens, two from county agencies, two from organizations or businesses, and two from county supervisors. Three of the comments, one from a county agency and two from county supervisors, were from individuals who had not commented on the Draft Environmental Assessment. The commenters expressed opinions on the preference for implementing an alternative, which included implementing only non-lethal methods (Alternative E), implementing the alternative that combined non-lethal methods with maximum removal of common ravens (Alternative D), implementing the Preferred Alternative (Alternative F), or developing and implementing an alternative not previously discussed. The last opinion from a commenter did not provide information on what the new alternative should be.

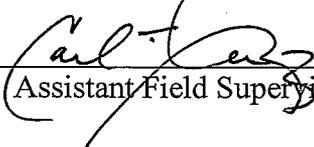
The purpose of an environmental assessment is to: (1) Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact; (2) aid an agency's compliance with the National Environmental Policy Act when no environmental impact statement is necessary; and (3) facilitate preparation of an environmental impact statement when one is necessary (40 CFR 1508.9). The purpose of a FONSI is to briefly present the reasons why an action, not otherwise excluded, will not have a significant effect on the human environment and for which an environmental impact statement therefore will not be prepared (40 CFR 1508.13). It shall include the environmental assessment or a summary of it and shall note any other environmental documents related to it (40 CFR 1501.7(a)(5)). If the assessment is included, the finding need not repeat any of the discussion in the assessment but may incorporate it by reference.

In general, the commenters provided opinions and assumptions, which were not supported with new data. One commenter provided observations on the aggressive hunting and scavenging behavior of the common raven in the Mojave Desert. One commenter assumed that if all

common ravens in an area preyed on the desert tortoise, implementation of Alternative C would take more than 2 decades to reduce predation by 75 percent while Alternative D would take less than 5 years. Several commenters urged the removal of more common ravens than proposed. They argued that the effort described in the EA would leave the common raven population well above its historic levels would not likely result in much benefit to the desert tortoise. One commenter, who did not comment on the EA, expressed the opinion that the overall socio-economic effect of implementing non-lethal measures would likely be much higher than described as state and local agencies may implement additional fees to help implement these measures. In addition, a commenter requested detailed analysis of the effects to other wildlife species from the preferred alternative, which they presumed would include removal of structures and water sources such as stock tanks that benefit other wildlife species. The commenter also noted that they thought that removing of one pair of nesting common ravens that preyed on the desert tortoise would result in their replacement with another pair of common ravens preying on the desert tortoise. Furthermore, he wondered why the EA did not consider global climate change in its analysis.

Because the analysis in the EA did not find that preparation of an environmental impact statement was necessary, and the comments provided were opinions and assumptions with no data to support these positions, we believe that the analysis and discussion of the issues in the EA and decision in the FONSI are appropriate. We did not include global climate change in the analysis of effects because the proposed action would have no effect on global climate change. Reducing predation by the common raven on the desert tortoise in the California desert would not affect the carbon footprint. The methods used to reduce this predation (two to a dozen vehicles per year, assumed to be gasoline or diesel-powered, for survey and removal efforts) would result in additional uses of petroleum products that would be less than negligible and therefore difficult to measure. The decision in the FONSI is to select and implement Alternative F (phased implementation of Alternatives B, C, and D). This alternative provides the greatest flexibility to achieve the U.S. Fish and Wildlife Service's goal of reducing common raven predation on the desert tortoise in a timely manner while safeguarding human health and safety. It reduces impacts to recreation to a minimal level, provides the greatest benefit to non-target wildlife species, and has minimal socio-economic impacts. Phased implementation with monitoring and adaptive management will allow for the lowest level of removal of common ravens that is effective in reducing raven predation on the desert tortoise in combination with implementing cultural and mechanical methods to reduce human subsidies to common ravens.

Concur:


Assistant Field Supervisor

5/22/08
Date