



December 2, 2014

Bull Trout Recovery
Idaho Fish and Wildlife Office
U.S. Fish and Wildlife Service
1387 S. Vinnell Way Room 368
Boise, ID 83709

VIA ELECTRONIC MAIL: fw1bulltroutrecoveryplan@fws.gov

Re: Comments on Endangered and Threatened Wildlife and Plants; Revised Draft Recovery Plan for the Coterminous United States Population of Bull Trout (*Salvelinus confluentus*); FWS-R1-ES- 2014-N082; FXES11130100000-145-FF01E00000

To Whom it May Concern:

The following comments are submitted on behalf of the Clark Fork Coalition (the "Coalition") regarding the above-referenced draft Revised Recovery Plan for the Bull Trout (the "2014 Draft Recovery Plan" or the "Plan").

Founded in 1985, the Coalition is a non-profit organization dedicated to protecting and restoring the 14 million-acre Clark Fork River watershed. We are comprised of 2,700 members who are united behind the belief that clean water is integral to the health of our communities. The recovery of the threatened bull trout is important to our members, many of whom live and recreate on or near the streams and rivers located in the proposed Columbia Headwaters Recovery Unit. We appreciate the opportunity to comment on this issue.

We are concerned that the 2014 Draft Recovery Plan has abandoned previous demographic targets for recovery planning to focus on a vague idea of threat management. Specifically, we believe the 2014 Draft Recovery Plan does not satisfy a fundamental mandate of Section 4 of the Endangered Species Act to provide "objective, measurable criteria which, when met, would result" in the species' delisting. We are concerned that the recovery criteria proposed in the 2014 Draft Recovery Plan will not inform site-specific conservation actions needed to recover the bull trout. First, the Plan removes demographic targets from the list of recovery criteria and replaces them with the management of yet-to-be-identified site-specific threats. Second, the Plan finds that up to 25% of core areas and 25% of local bull trout populations in four of the six recovery units – including the Columbia Headwaters Recovery Unit that includes the Clark Fork – could be extirpated with no effect to the overall recovery of the species. Because the Plan does not prioritize core areas or local populations, it is very unclear how this "25% rule" would actually affect bull trout populations. In a worst-case scenario, it could provide justification to sacrifice important bull trout populations. Finally, the Plan establishes no habitat standards and no correlation between the threats to be managed and the physical and biological features essential to bull trout conservation.

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Local fish biologists have informed us that there is little scientific consensus on the primary threats to many bull trout populations, and little understanding of how a population will respond to removal of a given threat. To be fully effective, we believe a recovery plan must provide for an adaptive strategy to conservation, which is driven by population targets drawn from sound conservation biology principles. Documenting the future increase and expansion of the existing bull trout populations, and the genetic reconnection of isolated populations and core areas is essential to a successful recovery process. Mediating threats is simply a means to this end.

ESA Section 4(f) requires that the Service “shall develop and implement” a recovery plan for each threatened or endangered species, “unless [the agency] finds that such a plan will not promote the conservation of the species.” 16 U.S.C. § 1533(f)(1). A recovery plan provides a critical roadmap, detailing management measures necessary to reduce and eventually eliminate a species’ risk of extinction, designing and funding research priorities, and securing cooperation from other federal, state, regional, and local governmental and private entities. See *Fund for Animals v. Babbitt*, 903 F. Supp. 96, 104 (D.D.C. 1995).

Under the ESA, each recovery plan must meet three specific criteria. The plan must identify: (1) “site-specific management actions” that “may be necessary . . . for the conservation and survival of the species,” (2) “objective, measurable criteria which, when met, would result” in the species’ delisting, and (3) “estimates of the time . . . and the cost” required to achieve the plan’s goals. 16 U.S.C. § 1533(f)(1)(B). Further, the agency “shall, to the maximum extent practicable give priority to those . . . species . . . that are most likely to benefit from such plans, particularly those species that are . . . in conflict with construction or other development projects or other forms of economic activity.” *Id.* § 1533(f)(1)(A).

We understand that the final recovery plan will include to-be-developed Recovery Unit Implementation Plans (RUIPs) for each of the six recovery units with the goal of developing and prioritizing site-specific conservation actions as well as time and cost estimates. While these RUIPs may satisfy the first and third criteria, we believe the second criteria has been overlooked in the draft Plan. Without scientifically sound objective, measurable criteria, the RUIPs will fail to result in bull trout recovery. We believe the recovery criteria proposed in the 2014 Draft Recovery Plan will not result in the recovery of bull trout, and instead may increase the risk of losing a significant percentage of local populations, or even entire core areas, that may be necessary for recovery. While we agree that addressing threats is necessary, without the demographic, habitat and monitoring components, there is no plan for determining whether bull trout populations are increasing. Please reconsider this abrupt shift in recovery planning and go back to what the science tells us is needed to recover the bull trout.

We appreciate the opportunity to weigh in on this important conservation issue. Thank you for incorporating our comments into the final recovery plan.

Sincerely,



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