

Montana Chapter of the American Fisheries Society

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14 March 2005

Lynn Starnes
President, Western Division AFS

Re: MCAFS - Request WDAFS to initiate a Survey of Bull Trout Status and Trend

Dear Lynn:

Ongoing debate continues in public forums, the press, AFS, and elsewhere about the status and trend of bull trout populations and the habitat conditions necessary to continue to support and eventually recover this species in the Pacific Northwest. Uncertainty about the effectiveness and implementation of regulatory mechanisms, including State and Tribal Recovery Plans and the Endangered Species Act processes, somewhat clouds future prospects for bull trout recovery.

Given those elements of uncertainty and concern that policy decisions regarding future protection for bull trout and their habitat may not adequately consider the science necessary to fully support bull trout recovery, the Montana Chapter AFS is hereby petitioning the Western Division AFS, through its' Bull Trout Committee, to conduct a survey of AFS members in the range of bull trout to establish a scientific consensus about specific bull trout concerns.

Specifically, MCAFS requests that WDAFS circulate, summarize, and report on results of a poll of its membership on important science and policy questions related to bull trout recovery. We leave the details mostly up to the expertise of WDAFS Bull Trout Committee to design appropriate questions and response language, but we would envision such a survey would address, at a minimum, the following elements:

1) Demographics of respondents:

Determine level of experience amongst respondents, both in managing bull trout and in specific aspects of their recovery.

Determine the employment affiliation of respondents (e.g. State, USFS, USFWS, Tribal, private consultants, etc.) so that results can be examined for evidence of institutional bias or agency disagreement.

Regionalize the assessment by States, bull trout management units, or other spatial criteria to determine if there is evidence of differing geographic status for the species.

2) Devise a series of questions upon which individual scientists will report honestly and objectively (based on their own personal experiences with bull trout), about prospects for recovery, recovery strategies, and the most significant long-term threats to achieving recovery. Some of the categories for query may be as follows:

Assess relative risk of extirpation, based not necessarily on extinction of the species as a whole, but on systematic loss of functioning biological units such as the Management Units identified in the Draft Fish and Wildlife Service Recovery Plan (formerly Recovery Units) or the Bull Trout Core Areas.

Assess the status and trend in bull trout populations in the region, both pre-listing (prior to 1998), post-listing (since 1998), and projecting into the short-term (10 years) and long-term (50 years) future.

Assess the status and trend in bull trout habitat conditions, both pre-listing (prior to 1998), post-listing (since 1998), and projecting into the short-term (10 years) and long-term (50 years) future.

Evaluate the effectiveness of ESA actions to date; individually assessing the listing in 1998-1999, Section 7 consultations, the critical habitat rules in 2004 and 2005, and potential future scenarios.

Evaluate the effectiveness of State and Tribal bull trout management plans in conserving the species and their level of implementation to date, both pre-listing and post-listing.

Evaluate the effectiveness of major bull trout habitat initiatives, such as the Northwest Forest Plan and InFish strategies in conserving the species and its' habitat.

Identify a scientific consensus on what biologists working with bull trout see as short-term (10-year) and long-term (50-year) prospects for recovery.

Identify current bull trout recovery strategies that are viewed as effective and those aspects that are not (e.g. habitat restoration, angling regulation, etc.).

Rank the categories of threats to bull trout in terms of their significance into the future; including at a minimum the categories presented in the Draft Federal Recovery Plan:

Dams and hydropower facilities
Forest management practices and forest roads

Livestock grazing
Agricultural practices and agricultural diversions
Transportation networks
Mining
Residential development and urbanization
Fisheries management and nonnative species
Isolation and habitat fragmentation
Inadequacy of existing water quality standards

If bull trout are to meet recovery criteria, identify the highest priority action items that must be accomplished.

3) Given these and other factors, determine if there is a scientific consensus amongst fisheries biologists as to the most likely future condition of bull trout populations, relative to today, in the Pacific Northwest in 10 years, 50 years, and 100 years?

4) Do professional fishery scientists view ESA listing and Federal Recovery mandates as an effective tool to restore the species? Do they believe the States and Tribes or others are in a better position to accomplish these same objectives? Do they believe the species would fare as well, or better in the future, with or without ESA listing?

Montana Chapter AFS believes that a systematic survey of this nature, conducted and reported by the scientists that are most actively involved in the management and recovery of bull trout, would be a useful benchmark in assessing the progress to date in recovery of bull trout. More importantly, it is relevant to setting direction for policy and management decisions into the future and in informing the position that AFS units (chapters, divisions, and national) should take on issues important to fostering bull trout recovery. We look forward to your response to these concerns and are willing to assist with this process. Presentation of the results of this survey could be a highlight of the 2006 WDAFS meeting, to be held in Bozeman, Montana.

Sincerely,

A handwritten signature in dark ink, appearing to read "Clint Muehlhahn". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

President, Montana Chapter AFS