July 1, 2014

Robyn Thorson, Regional Director
U.S. Fish & Wildlife Service, Pacific Region
911 NE 11th Ave
Portland, Oregon 97232

RE: Intertribal Bull Trout Recovery Planning Concerns

Dear Ms. Thorson:

There is a growing concern among Indian tribes in the Columbia River Basin that the U.S. Fish and Wildlife Service’s recent bull trout recovery planning efforts may be doing a disservice to the fish and the tribes who depend on them. This concern originates from the Service’s decision to exclude interested tribes from the State and Federal Management Team (“SFMT”) and extends to the SFMT’s flawed Draft Bull Trout Recovery Strategy. These flaws include but are not limited to:

- Abandonment of critically important demographic recovery targets
- Failure to account for critical habitat in recovery planning
- Use of a threats assessment tool that appears to bias results toward conclusions of successful rather than unsuccessful management effectiveness, and that may result in delisting where it is not biologically justified
- Failure to follow the Service’s long-standing Interim Recovery Planning Guidance

As our trustee, the Service has an obligation to meaningfully involve interested tribes in decisions that affect our trust resources. Because the Service has not provided tribes with this opportunity to date, we formally request a meeting to discuss our concerns in more detail. Please schedule this meeting prior to the publishing of the draft recovery plan in the federal register and with sufficient time to incorporate our suggestions into the draft recovery plan.

Regards,
Glen Nenema, Chairman
Kalispel Tribe of Indians

Date

7-2-14
Charlotte Rodrique, Chairperson
Burns Paiute Tribe

July 3, 2014
Ronald Trahan, Chairman
Confederated Salish and Kootenai Tribes

Date
7-8-14
Chief J. Allan, Chairman
Coeur d'Alene Tribal Council

7-16-14

Date
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Regards,
Lindsey Manning, Chairman
Shoshone-Paiute Tribes

7.10.14
Date