

To: Wayne Paradis



November 7, 1994

Dr. Ernie Ables
College of Forestry, Wildlife, and Range Sciences
University of Idaho
Moscow, ID 83843

Dear Ernie:

Subject: Multi-agency conservation strategy to avoid listing of bull trout as a threatened or endangered species.

I recently received the attached letter from the IDFG Commission seeking TWS input on conservation strategy intended to avoid listing of the bull trout. Their mailing list is a bit outdated. I apologize for not getting the letter to you sooner, but I've been out of town quite a bit lately. Perhaps you also received a request.

I feel that it is very important that we respond to this letter, as it is the first time (to my knowledge) that the IDFG has asked for input from TWS. I am sure that AFS received the same letter and is probably preparing a response. I would suggest that we coordinate our response with AFS as they have the experts on this subject within their group.

I would like to take the liberty of making a few suggestions concerning our response if I may. Our response should include a strong statement regarding actual implementation of this conservation strategy. History has repeatedly shown us that there is a wide gap between USFS and BLM land management plans and actual implementation on the ground. Political realities and funding limitations often preclude implementation of the best features of management plans.

Any plan of this sort must have clear and measurable goals set within a specified time frame and must also include a monitoring plan that can accurately measure if progress is being made toward achieving the goals. The conservation strategy should also include a well thought out plan of specific action items that will be implemented immediately to achieve the desired goals implemented in the future



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if progress is not made. Needless to say, a funding commitment for monitoring and implementing action items is essential to the success of this strategy.

Bull trout populations are suffering because of poor land management practices within their range. Reversing their decline will require fundamental changes in the way federal lands are managed. This will require strong backing from the Regional Forester and BLM State Director (and perhaps all the way from Washington) since any a strategy that is to succeed in preventing the listing of bull trout must include some major changes in the way these agencies implement existing laws.

The letter did not indicate whether or not our Congressional delegation was involved in preparing the conservation strategy. If they were not involved it could be a fatal flaw. They will have to buy into the strategy at some point along the way or it is doomed to failure.

I will call IDFG on Monday and get copies of the strategy for you, Jeri Williams, and me. I will be happy to assist in reviewing the strategy and preparing comments in the areas I have discussed above. We'll need to get someone else to coordinate with AFS in preparing the technical aspects of our response and to pull the entire statement together.

Please call me to discuss this after you have had some time to give it some thought.

Sincerely,



Chuck Blair

c: Jeri Williams/TWS Conservation Affairs

