



**SPORT FISHING & BOATING
PARTNERSHIP COUNCIL**

6 October 2014

The Honorable Sally Jewell
Secretary
Department of Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Jewell:

The Sport Fish and Boating Partnership Council (Council) appreciates the opportunity to comment on the U.S. Fish and Wildlife Service Fish and Aquatic Conservation (FAC) Program FY 2015-2019 Strategic Plan. The Council was established in 1993 to advise the Secretary of Interior, through the Director of the U.S. Fish and Wildlife Service (Service), on aquatic conservation endeavors that benefit recreational fishery resources and recreational boating, while encouraging partnership among industry, the public and government. The Council has worked collaboratively with the Service and its stakeholders since its creation to enhance the impact of the Sport Fish Restoration Program and the FAC.

The Council has a history of commitment to fish and aquatic resources programs of the Service. Since 2000, the Council has produced five reports, all at the request of the Service directorate, to provide guidance and assistance with the direction of the Fisheries program relative to conservation of fisheries resources and maintaining and enhancing recreational fishing opportunities. This was never more evident than in the *Strategic Vision for Fish and Aquatic Resource Conservation in the Fish and Wildlife Service: A Partnership Perspective* (Partnership's Vision) that was released in 2013 by the Council. The Council understood the Service would use the Partnership's Vision as a framework to develop a more detailed strategic plan. The Council also anticipated the strategic plan would build upon the goals in the Partnership's Vision and include specific outputs, timelines, budgets and performance metrics. Although the Council appreciates the close similarities between the goals of each document, we are concerned that many essential components in the Partnership's Vision have been omitted from the draft Strategic Plan.

Specifically, the Council notes that the draft Strategic Plan fails to address a number of the Vision's recommendations that are essential to a properly-missioned and appropriately-focused FAC, including the following examples.

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Goal 1 of the Strategic Plan - "Conserve Fish and Other Aquatic Resources" - focuses almost exclusively on threatened and endangered species and does not effectively address the breadth of other aquatic resources, including recreationally important native and non-native species. The first goal in the Partnership's Vision- "Conserving fish and aquatic species that are commercially, recreationally, ecologically and culturally important is central to the FWS mission" - captures the importance of conserving the broad spectrum of fish and other aquatic species. Moreover, Goal 1 in the draft Strategic Plan does not mention partners until the third objective. This seems to be emblematic of a "top down" rather than a collaborative approach to managing priority species. We recommend you reconsider the objectives of the Vision document and work with partners to cooperatively develop priority species lists, both for threatened and endangered species as well as other important species, and strategic plans to address their needs.

Furthermore, while the titles of Goal 1 in each document are almost identical, the omission of "self-sustaining" from the draft Strategic Plan is important to note. The goal of any fisheries management plan should be to manage for self-sustaining populations, and mitigation hatcheries are an essential component to maintaining populations where water development projects have significantly altered native habitats.

The objectives of Goal 2 of the Strategic Plan - "Protect, Restore and Maintain Aquatic Habitat" - again seem to be a top-down, rather than a collaborative approach. The Service should be working closely with its partners to develop landscape scale habitat conservation strategies, with the National Fish Habitat Partnership (NFHP) as the principal partner. NFHP already has a national network of grassroots partnerships strategically positioned to implement habitat conservation efforts across species and landscapes.

In addition to NFHP, the Partnership's Vision recommendations focused on incorporating the network of Fish and Wildlife Conservation Offices (FWCO's), National Wildlife Refuges (NWR's) and other Service field offices as the "storefront" for any fisheries habitat restoration and conservation efforts. We believe this is invaluable advice, given the trusted relationships these local offices have with not only the state agencies, tribes, NGO's and local communities, but perhaps most importantly, the private landowners who are critical to any large scale, long-term habitat conservation efforts. The strategic plan needs to more effectively incorporate FWCO's and other FAC components into not only habitat conservation implementation, but project prioritization and planning as well.

The draft objectives in Goal 4 - "Fulfill Tribal Trust and Subsistence Responsibilities" - only go half-way. While they appropriately address what the FAC must do internally to fulfill its responsibilities toward Tribes, they fail to address the critical need for the FAC to support and enhance tribal aquatic resource management capacity. The language of this goal is an acknowledgement that the FAC needs to take responsibility for its relationship with the Tribes. However, Tribes must be given the opportunity to cooperatively partner with the FAC, as well as meet their own management responsibilities.

The Council is pleased to see recreational fishing within Goal 5 - "Promote Recreational Fishing, Other Public Uses and Enjoyment of Aquatic Resources, and Educate and Engage the Public and our Partners to Advance our Conservation Mission." However, it is concerning that the word "recreation" is omitted from the first objective. Arguably, this objective, which is entitled "Work with Tribes, states, partners and other stakeholders to maintain healthy, abundant and sustainable fishery resources," as well as the first

bullet under this objective, should have been the first objective and bullet under Goal 1. Again, the draft Strategic Plan does not include the Partnership Vision's recommendation under Goal 5 that the first objective should be the Service working with its partners to meet agreed-upon recreational demands.

As Service leaderships know, the Council is very concerned with the direction of the Service relative to the National Fish Hatchery System (NFHS), and particularly the mitigation hatcheries. The attempt to incorporate mitigation hatcheries under the goal of promoting recreational fishing falls short of Council expectations. Recently, the Service has been shifting hatchery programs and priorities from sport fish programs to native fish programs. According to Executive Order 12962, the Service has the responsibility to stock recreational fish species into selected waters as mitigation for federal projects. These often non-native sport fish are important economic drivers for states and Tribes, many of which manage these populations as "wild" stocks. This shift away from sport fish programs will not only negatively affect local economies throughout the country but also recreational fishing as a whole. The Service neglected to incorporate the importance of the NFHS as a whole to state and tribal fisheries management programs across the country. The NFHS is mentioned in Goal 5 only to hold "educational programs and events at Service facilities and lands (e.g. the National Fish Hatchery System...)." It seems counterintuitive to promote recreational fishing and hold educational events at a hatchery that no longer produces recreationally important species of sport fish.

Overall, the Council is concerned about the lack of feedback from the Service as to why some of the Vision's recommendations were accepted while others were rejected, particularly those highlighted above. Moreover, the Council is troubled by the extremely short amount of time for partners and stakeholders to provide input on the draft, as well as the ad hoc approach that the Service has taken in collecting comments on the Strategic Plan. Many of the plan's objectives are ambitious and will require close coordination and support from Service partners in order to be successful. Failure to seek adequate input from the states, Tribes and other key stakeholders is inconsistent with one of the plan's stated values of achieving integrity through "honesty and transparency." Furthermore, rushing the process leaves a sense that recommended changes to the draft Strategic Plan will not be considered. Although the Strategic Plan touts stakeholder coordination and involvement as a high priority throughout, a comment period of less than five weeks is simply too short for meaningful development of a truly collaborative plan.

The Council is apprehensive about the vagueness of the goals, objectives and strategies in the draft. We understand a strategic plan is a framework, but the draft lacks guidance on how objectives will be accomplished as well as measurable outcomes. There should be metrics and a framework for stakeholder engagement, particularly when assessing and prioritizing lists of species that are threatened, endangered or declining or when considering changes in NFHS operations to address any conservation goals. The process of creating annual implementation plans and implementing the Strategic Plan overall must be a collaborative process between the Service and its partners. With this in mind, the Council requests that the Service include stakeholders, including state Fish Chiefs, Tribal leaders, the Council, and representatives of the recreational fishing industry and anglers, on national and/or regional teams that will develop annual implementation plans. Including representatives from all interested parties would provide a clear opportunity to renew positive and meaningful collaboration toward common goals and support successful plan implementation.

The Strategic Plan states that the Service provides “hundreds of millions of dollars annually to state fish and wildlife agencies through” the Sport Fish Restoration Program. The Council would like to remind the Service that it is anglers, boaters and the associated recreational industries that pay for a disproportionately large share of fish and aquatic resource management through excise taxes that fund the Wildlife and Sport Fish Restoration and Boating Trust Fund. Recreational anglers and boaters are dedicated conservationists and are responsible for funding these Trust Funds; not the Service. It is imperative that the goal of providing recreational fishing opportunities remains an equally strong component of the Service’s mission and vision. Active promotion and support of the Sport Fish Restoration Program is essential as states and federal conservation agencies all have a direct link to these conservation management funds. The Council recommends that the phrase “recreational fishing” be included in the preamble of the Strategic Plan to highlight that extensive on-the-ground conservation work exists, in large part because of recreational fishing. The amount of money that goes into aquatic conservation originates from excise taxes and license fees which far exceed the much valued Land and Water Conservation Fund. Over the last ten years the Land and Water Conservation Fund has provided \$3.6 billion towards conservation, while the Sport Fish Restoration Fund when coupled with fishing license revenue has provided over \$11 billion. We believe it is essential for the Department to keep the magnitude of this investment in mind as it prioritizes support for recreational fishing and aquatic resource conservation.

Management and conservation for aquatic resources are a shared responsibility. Success in strengthening conservation goals will rely on continuing partnerships and forging new partnerships that will cut across jurisdictions and link stakeholders and partners. Without the continuation of partner involvement and collaboration, the end goal of protecting our nation’s fish and aquatic resources will suffer. The Council appreciates your consideration of these comments and looks forward to working cooperatively and productively with the Service to implement the Strategic Plan. We again ask that the Service work with the Council to draft “organic” legislation for the Fisheries Program that would incorporate the Partnership’s Vision and ensure the long-term viability and proper performance of many FAC Programs, including the National Fish Hatchery System.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Kovarovics", with a long horizontal flourish extending to the right.

Scott Kovarovics
Chair

Cc: Dan Ashe, Director, U.S. Fish and Wildlife Service
David Hoskins, Assistant Director- Fish and Aquatic Conservation
Sport Fishing and Boating Partnership Council members