



SPORT FISHING & BOATING
PARTNERSHIP COUNCIL

July 10, 2014

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

Dear Secretary Jewell:

As you know, the Sport Fishing and Boating Partnership Council (Council) was established in 1993 to advise the Secretary of Interior, through the Director of the U.S. Fish and Wildlife Service (Director), on aquatic conservation endeavors that benefit recreational fishery resources and recreational boating, while encouraging partnerships among industry, the public, and government. It is with this charge in mind that the Council wishes to express our sincere concerns and disappointment with the recent *National Fish Hatchery System – Strategic Hatchery and Workforce Planning Report (Report)*. Although the *Report* was dated March 2013, it was not released to the public until November 15, 2013. The fact that no stakeholders, including the state agencies that depend on the National Fish Hatchery System (NFHS) as part of their overall fisheries management strategy, were consulted during the development of the *Report* highlights the significant and problematic lack of transparency in the current direction of the fisheries program in the U.S. Fish and Wildlife Service (Service). Furthermore, it is unclear as to whether the Service fulfilled its tribal trust responsibility to consult with any tribes on the potential impacts to their nations during the *Report's* development. When the *Report* was released last year the Assistant Director of Fisheries stated in a conference call that the agency would engage the sportfishing community in discussions to find solutions. To date there has been no such process save some ad hoc discussions.

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More specifically and of the utmost concern to the Council is that the recent *Report* clearly demonstrates that not only does the Service have no intention of incorporating the prior recommendations of stakeholders, but that the overall direction of the NFHS is fundamentally shifting away from sport fish propagation. This cannot be allowed to happen, and brings into question the authority the Service has to abdicate statutory responsibilities under various acts, including the Fish and Wildlife Coordination Act of 1934, to provide for recreational fishing opportunities and fulfill tribal trust responsibilities.

The NFHS was established in 1871 to address seriously declining fish populations by building a network of federal hatcheries to propagate fishery resources for future generations of Americans. Since that time, the NFHS has provided millions of sport fish each year for America's angling public, resulting in an astounding economic ripple effect and increased recreational opportunities. The facilities, which average more than 70 years old, annually produce and distribute 140 million fish and 120 million fish eggs with a value over \$5 billion. In addition to the more than 68,000 jobs supported by the NFHS, for every tax dollar invested in the system, there is a return of \$28 to our national economy because of the sport fishing opportunities they provide.

In 2000 an independent report entitled "Saving a System in Peril" was released that included suggested recommendations on how to improve the aging and financially strapped hatchery system in addition to highlighting the economic, historical, and cultural significance the NFHS plays. However, this report also concluded, "...that without a national vision to define regional goals and objectives designed to fulfill overall FWS Fisheries Program strategies, the national hatchery system will continue to drift and will be in peril." Unfortunately, this report, and subsequent reports with similar recommendations in the 14 years since, has been ignored by the Service, and the System is indeed in peril.

More recently, during an oversight hearing before the House Natural Resources Committee on March 5th, the Assistant Director of Fisheries for the Service testified that the agency is using its new strategic *Report* to "engage partners and stakeholders in a discussion on its major findings and recommendations." Yet, the Director of the Service had already issued a Memo last September to his Regional Directors, relative to the *Report*, indicating that "to bring our expenditures in line; not by mindlessly reducing our programs functions but by making hard decisions to close lower priority facilities." Under the Service's new strategic plan, recreational propagation programs are now the lowest priority. However, when determining the priorities for the NFHS, the economic impacts to local, state and regional economies were not evaluated or considered by the Service, nor were the state agencies consulted about the negative ramifications of the Service's new direction on their ability to effectively manage fish populations.

Therefore, the Council would appreciate your consideration, in the near term, to keep these recreational propagation programs operating in FY'15 as required by the Fish and Wildlife

Coordination Act of 1934. And, in the long-term, to consider working with the Council to develop draft "organic" legislation for the Service's Fisheries Program that would, in part, ensure the long-term viability and proper performance of the NFHS.

We appreciate your consideration of these requests and stand ready to assist you and your staff in these endeavors.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Dammrich", written in a cursive style.

Thomas J. Dammrich
Chair

Cc: SFBPC members
Dan Ashe, Director, U.S. Fish and Wildlife Service
Mr. David Hoskins - FWS, AD-FAC
