



Mr. H. Dale Hall  
Director  
U.S. Fish and Wildlife Service  
1849 C Street, NW  
Mailstop 3256  
Washington, D.C. 20240

JAN 29 2007

Dear Director Hall,

I am writing in follow-up to the November 7-9, 2006 meeting of the Sport Fishing and Boating Partnership Council in Charleston, S.C. On behalf of the membership of the Council, I would like to thank you for your candor during the meeting and your ongoing support for the work of the Council. Together we have done much to provide enhanced boating and fishing opportunities for the American public, while also leading efforts to conserve our remarkable resources.

As you know, the Council has exerted great effort over its lifetime, but especially over the last six years, to reinvigorate the Service's Fisheries Program. Our cooperative efforts, we believe, have resulted in a sturdier more focused fisheries program. Past work completed by the Council include the "Saving a System in Peril" and "Partnership Agenda for Fisheries Conservation" reports, both of which laid the groundwork for the completion of the Fisheries Program Vision and Strategic Plan. These efforts have led to a program that is more closely allied with its base of partners and stakeholders. In addition, the Service asked the Council to complete a program assessment mandated by the President's Office of Management and Budget (OMB). These efforts were both time and labor intensive, and brought a wide array of members from the fisheries and aquatic resource conservation community to the table to work in collaboration with the Service in order to create the strategically focused Fisheries Program that exists today. We recently learned that this program assessment helped the Fisheries Program in receiving a score of 85.5% on its 2006 Program Assessment Rating Tool. It is because of this history of cooperative effort that I bring to your attention an issue of great concern that arose at the last Council meeting: the proposal to combine some or all of the functions and budgets of the Fisheries Program, Ecological Services and the Endangered Species Program. Frankly, it is disconcerting that this reorganization has been initiated by at least two Service regions and will be a part of the fiscal year 2008 budget proposal with minimal or no consultation with the Service's partner and stakeholder base. While the information that you provided at the meeting related to this reorganization helped make the Council aware of these changes, questions remain.

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**William Taylor**  
*Past President*  
American Fisheries Society

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*Director, Division of Wildlife*  
South Dakota Department of Game,  
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**H. Dale Hall**, ex officio  
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In anticipation of our February 20 briefing I wanted to discuss our concerns in a bit more detail. First, the Council believes that the programmatic and budgetary consequences of the proposed reorganization will have a significant negative impact on the Service's ability to provide future opportunities for the fishing and boating public, and on the nation's ability to enhance both the conservation and responsible use of aquatic resources. Since a major policy thrust within both the Service and the Department of the Interior has been "Cooperative Conservation", the proposal to combine Fisheries and Endangered Species would seem to be counterintuitive. To clarify, the Council is wholly supportive of threatened and endangered species recovery. We believe that the Service's Fisheries Program can and should play a key role in recovery activities, but we fail to see how placing a program with a history of working proactively and voluntarily with a wide range of partners will benefit from being co-mingled with a program that is driven mainly by litigation and often adversarial interactions.

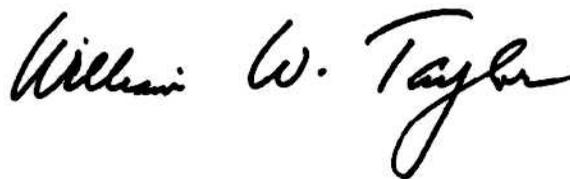
Second, Council members are concerned that the change in operation will negatively impact the Service's abilities to enhance and conserve the Nation's fisheries and aquatic resources, while continuing to provide increased recreational opportunities for the American public. Recreational angling is an important heritage socially, biologically and economically. The Service's Fisheries Program historically has contributed positively to each of these facets of the fishing heritage. The Council is concerned that by combining the Fisheries Program with Ecological Services and Endangered Species the fisheries management mission within the Service will be replaced by an endangered species focused mission. Such a drastic shift in focus could negatively impact fishing opportunities for adults and children, will divert energy away from proactively managing healthy fish populations and possibly degrade the economic benefits generated by the boating and fishing publics, and the associated boating and sport fishing industries. Also, this change has the potential to upset or further erode the funding streams that nourish most of the fishery management funding in the United States: the Sport Fish Restoration and Boating Trust Fund.

Third, we are concerned that the work load for the Fisheries Program associated with its possible role within Endangered Species will leave little time for managing interjurisdictional and other trust species, and will prevent the Service from lending assistance in managing healthy fish stocks that are the backbone of the recreational fishery and the bell weather that depicts the success of our stewardship activities. One of the keys to the success of the efforts of the Fisheries Program is that it works cooperatively with States, Tribes, conservation NGOs and other partners to manage healthy fish populations for sustainable harvest, therefore preventing the need to list species in the first place. We are concerned that the heavy work load associated with threatened and endangered species activities will overshadow Service management activities aimed at perpetuating and improving the sustainability of the Nation's fish stocks that remain biologically, socially and economically viable and healthy. This could lead to declines in healthy fish populations and actually increase the possibility of future listing under the Endangered Species Act.

Finally, while the Council understands the budgetary constraints that all federal agencies face, we are concerned about the ability of the Fisheries Program to continue to receive appropriate and sustainable funding once it is co-mingled with the Endangered Species program. We believe that a strong Federal fishery program that maintains an ability to provide the nation with a quality sport fishery and quality waters that support such fisheries is an important part of the Service's mission and is in keeping with guidance and advice provided by the Council. Maintaining healthy fisheries for the public to use and enjoy also is keeping with Executive Order 12962 on Recreational Fishing that was signed in 1995. We are concerned that a serious outcome of this reorganization would be a loss of dollars and staff resources to perform traditional fisheries functions and the reallocation of these resources to endangered species activities. Our concern is only heightened by the fact that the Endangered Species program was identified as a program that is "Not Performing" by the OMB.

The Council membership looks forward to hearing additional details related to the Fisheries Program proposal, and stands ready to assist in enhancing the stewardship of this Nation's aquatic resources and its use. Please do not hesitate to contact me to discuss this issue prior to the conference call if you think that would be useful. I can be reached on 517-353-0647. Thank you for your attention in this matter and for offering to spend some of your valuable time discussing these important issues with the Council.

Sincerely,

A handwritten signature in black ink that reads "William W. Taylor". The signature is written in a cursive style with a large, prominent 'W' and 'T'.

William W. Taylor  
Chairman  
Sport Fishing and Boating Partnership Council

Attachment

Cc: SFBPC members  
Mamie Parker  
Elizabeth Stevens  
Phil Million