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May 3, 2018

The Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Zinke:

On behalf of the members of the Sport Fishing and Boating Partnership Council (Council), thank you for meeting with us on April 4. We appreciate your time and the opportunity to discuss how we can work together to expand access to recreational angling and boating across public lands and waters managed by the Department of the Interior.

Response to Secretarial Order 3347

The Council applauds your focus on improving recreational access across National Wildlife Refuges, National Parks, and other lands managed by the Department. Secretarial Order 3347 was a great first step, and the Council appreciates the opportunity to review and comment on specific recommendations made by the National Park Service (NPS), Fish and Wildlife Service (FWS), and Bureau of Land Management (BLM) in response to your directive.

In general, the Council strongly supports recommendations to “maintain and restore healthy fisheries, promote recreational fishing, and improve public access for fishing” as described in the April 3, 2017 report from the NPS and FWS to the Assistant Secretary for Fish, Wildlife and Parks. The recommendations address important issues and the Council looks forward to working with the agencies to proactively implement these recommendations.

The Council wants to stress how important it is for federal agencies to actively collaborate with states, local governments, tribes, and other partners across a range of issues affecting fishing and boating. We know you embrace this approach and are actively working to facilitate more effective collaboration throughout the Department.

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1. The Council encourages the Department to place equal emphasis on promoting recreational boating and improving access for recreational boating in the future.

Approximately 50 percent of anglers fish from a boat and the large majority of boaters also fish. We believe it is critically important to promote and facilitate boating access as part of a broader departmental effort to expand access to outdoor recreation.

2. The Council wholeheartedly agrees that modernizing National Fish Hatchery facilities must be a priority. The hatchery system is essential to maintaining and restoring healthy fish stocks, including sport fish. The mounting backlog of deferred maintenance threatens hatchery operations nationwide and could dramatically limit the ability of the FWS to propagate fish for a wide range of purposes. As the Department develops strategies to boost infrastructure investment, the Council strongly encourages you to proactively address deferred maintenance within the hatchery system and to focus investments on hatcheries that directly support recreational fishing, or have a multiple-use focus, including propagation of sport fish.

Conservation and recreation should not compete for federal time or money, and priorities should be set for holistic objectives.

3. The Council is pleased with recommendations from FWS to work with the Recreational Boating and Fishing Foundation (RBFF) on the 60 in 60 campaign and establishment of first catch centers. The RBFF is an incredible resource and national leader on public engagement and communication. The Council is interested in more specific information about how the FWS will support these initiatives, especially efforts to advance the 60 in 60 campaign. We encourage Department staff to consult the newly released AFWA President’s Task Force Report on Angler Recruitment, Retention and Reactivation (R3), which is now available at https://www.fishwildlife.org/application/files/2515/2349/7242/AFWA_R3_Taskforce_Report_Final_4.pdf.

4. The Council is encouraged by creation of new positions of Hunt and Fish Chiefs within the FWS. The Council stands ready to work with the Chiefs, individually and collectively, to advance our shared goals for recreational fishing. With this in mind, for the Council's June conference call, we request a more detailed briefing about work the Chiefs have completed to date and priority actions and issues they have identified going forward.

The RBFF, the Council to Advance Hunting and the Shooting Sports (CAHSS), and the Wildlife Management Institute (WMI) have partnered with the FWS National Conservation Training Center (NCTC) and the Association of Fish and Wildlife Agencies (AFWA) to offer Recruitment, Retention and Reactivation (R3) training for state and federal R3 coordinators and practitioners. The course will be held on June 11-14, 2018 at NCTC, and we encourage Department employees to enroll in "Recruit, Retain, Reactivate Training," Course Code OUT8072.

Additional Recommendations

Building on the Council's previous work to sustain and expand access to recreational fishing and boating, we offer the following additional recommendations that we believe directly support achieving the broader access goals you have identified.

1. Improve coordination and communication on federal permitting affecting boating infrastructure and water access. In our meeting on April 4, you highlighted the overly complex permitting processes that directly affect public land management, energy development, and many other activities. This is equally true for boating infrastructure and water access projects for which the FWS, Army Corps of Engineers (Corps), and National Marine Fisheries Service (NMFS) are the principal permitting and regulatory authorities. The review and consultation process is not well coordinated and agencies do not communicate effectively about permit status with applicants, including state agencies and the private sector.

Addressing this problem is one of the Council's top priorities, and the Department has played a direct role in facilitating discussions among the three agencies about how to improve internal and external communication and coordination. We urge the Department and FWS to resume that role in partnership with the Council.

Over the past three years, Council members and the agencies have made important progress – opening a dialogue about the issues and identifying existing processes and approaches that can serve as models for agencies nationally or on a regional basis. We believe it is important to build on these initial steps. Moreover, the recently signed MOU between federal agencies on permitting infrastructure provides additional impetus for the Department to engage the Corps and NMFS on this issue. The Council believes strongly that, by improving communication and coordination, agencies can achieve the equally important objectives of conserving aquatic species and habitat and expanding access for boating and other water-based recreation. The enclosed letter provides additional background about the issues and previous Council recommendations.

2. Resume joint FWS/Council review of BIG grants applications. The Council is a strong proponent of the successful Boating Infrastructure Grant (BIG) program that provides essential access to large, transient boats. Until last year, the Council's BIG Tier II Ranking Subcommittee met with FWS staff to jointly review and rank Tier II proposals. The combined review with the Subcommittee's boating industry leaders and FWS staff enhances the ranking process by sharing knowledge and expertise on boating access design, construction methods, permitting, and boater expectations. The Council encourages this practice to continue.

3. Approve a waiver from Departmental review for Clean Vessel Act and BIG grant programs. The Council is very appreciative of the June 2017 waiver from Departmental review for Boating Access grants funded by the Sport Fish Restoration Act. We encourage you to consider approving a similar waiver for the Clean Vessel Act (CVA) and BIG grant programs. As you know, these grants are for specific purposes and are already subject to multiple layers of review prior to reaching the FWS Director's office. We believe providing a similar waiver for CVA and BIG grants will streamline the process while maintaining rigorous review of grant applications.

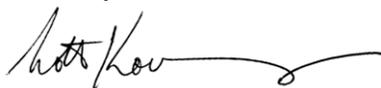
4. Ensure the Fisheries Program Strategic Plan appropriately addresses the program's role in supporting and promoting recreational fishing. The Council, at the request of the FWS, led a comprehensive effort to develop a detailed framework for a strategic plan for the Fisheries Program. The plan adopted by the Fisheries Program embraces elements of the Council framework and includes objectives related to recreational fishing. We encourage the Service leadership to place additional priority on this element of the Fisheries strategic plan as the FWS and the Department emphasize recreational fishing.

We also believe it is essential to review the plan to evaluate how it addresses the future of the hatchery system and then consider modifying the strategic plan based on priorities to modernize hatchery facilities.

Finally, the Council believes it is imperative for the Fisheries Program to work proactively with states, tribes, non-governmental organizations, and the private sector in developing annual implementation plans to achieve the conservation, recreation, and other goals in the strategic plan.

Thank you for engaging the Council on critical access issues and for considering our additional recommendations. Council members look forward to working with you and all Interior agencies to expand participation in and access to recreational fishing and angling.

Sincerely,



Scott Kovarovics
Chair

Enclosure

cc: Greg Sheehan, Principal Deputy Director, FWS