SOUTHEAST AQUATIC RESOURCES PARTNERSHIP

SARP

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Mr. Steve Perry
National Fish Habitat Board
11 Hazen Drive
Concord, NH 03301

September 5, 2011

RE: SARP Comments on Proposed Funding Allocations

Dear Steve:

Thank you for the time and effort that you and the other committee members put in to development of these proposed funding allocations. . We all recognize that available funding is not sufficient to fully address the challenge of conserving aquatic habitats across the county, and that we will achieve the greatest conservation benefits by allocating limited resources to the greatest needs. We appreciate the difficulty of identifying the greatest needs in a rational and equitable manner.

SARP is concerned that the "block grant" approach the committee was directed to take will disproportionately favor regions of the country that chose to form multiple, smaller, and in many cases overlapping FHPs. We are also concerned that both of the proposed options will be burdensome to the FHPs, will add to the uncertainty associated with a lack of long-term funding, will be too subjective, and do not adequately consider the resources and resource challenges being addressed by the FHPs. For these reasons and more we think that neither option is desirable for funding allocations to FHPs.

We suggest that any funding allocation methodology should take into account the vast differences in the size and scope of the FHPs and the issues that each FHP addresses. We believe the following items should be considered when allocating funds:**Number of active partners:** The coordination and management of a multi-State partnership is much more complex and labor intensive than managing a one or two state partnership. The workload is much greater in gathering comments, sharing information, and incorporating input from multiple State and Federal partners than working with partners from a single State.

Area and Types of Aquatic Habitat: The amount of available aquatic habitat in an FHP influences the complexity of coordinating and managing a partnership. The habitat types – riverine, coastal, reservoir, lakes, estuarine, etc. – all affect the number of partners and constituents involved in managing the partnership.

Aquatic Species: The logistics of dealing with a single fish or mussel species or a family of species is much different than addressing the needs of multiple species in a given landscape.

Human Population Impacts within the FHP: The State Wildlife Grants Program, Endangered Species Program, the Sport Fish Restoration Program, and the Wildlife Restoration Program (DJ and PR) use the size of the State and human populations in a formula to allocate funds. States with a large population base will see growth and development encroaching on farmland, forests, and aquatic resources like rivers, reservoirs, and coastal estuaries reducing areas of prime habitat for fish and other aquatic species. FHPs in high population density areas will see greater impacts to the aquatic resource than those FHPs of vast undeveloped land and protected lands. Data has demonstrated the correlation between the number of at risk fish species in the eastern and southeastern United States and increased population levels (NatureServe Central Databases, 2007). We suggest the Board also consider the number or percentage of stream miles, coastal acres, and miles of shoreline listed as impaired or polluted in a FHPs coverage area when developing funding allocations.

There are several methods already being used within the federal system for allocating funding to states for wildlife and fisheries conservation programs, such as those mentioned in the previous paragraph. We suggest the committee and the Board consider those methodologies, both of which take important factors other than geographic area into consideration.
We also suggest that some consideration of FHPs record of success with NFHAP funds, existing framework, infrastructure, ability to leverage funds and partners, and level of participation in NFHAP by the partnerships be taken into consideration. SARP has actively participated in all aspects of NFHAP for the past five years and more. We have participated in numerous NFHAP committees and workgroups, and expended partnership funds on habitat assessment, travel, education about NFHAP, recruitment of partners, and promotion of NFHAP. Significant cuts in NFHAP funding could jeopardize much of the progress made by SARP on behalf of NFHAP. Again, we thank you and the committee for your service, and we hope this process leads to a satisfactory solution that ultimately improves fish habitat conservation.

Sincerely,

Scott Robinson (signed)