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October 7, 2014

Mr. Dan Ashe
Director
U.S. Fish and Wildlife Service
Main Interior
1849 C Street NW, Room 3331
Washington, DC 20240-0001

Dear Director Ashe,

The National Fish Habitat Partnership Board (Board) has completed its review of the US Fish and Wildlife Service (USFWS) DRAFT Strategic Plan for the Fish and Aquatic Conservation Program (FAC). Overall, the Board believes that the USFWS program is setting a strong foundation for their FAC Program in aligning the Mission, Vision and Values of this Draft Strategic Plan with the Sportfishing and Boating Partnership Council's (SFBPC) Strategic Vision for the program. The Goals within the DRAFT Plan are clear and are aligned with stakeholder interests for the program's future.

The Board, however has concerns with regard to Goal 2, Objective 1: "Develop Landscape Scale Habitat Conservation Strategy", for which we respectfully request clarity from your agency. Specifically, our concern here is the National Fish Habitat Partnership (NFHP) is currently accomplishing what this proposed objective seeks to create. The Fish Habitat Partnerships, working at various geographic scales, have a responsibility to develop aquatic conservation strategies. And at the national level, the Board completed a national aquatic habitat assessment in 2010 to help classify priority species and habitats to inform habitat protection and rehabilitation investments and will complete our second national assessment in 2015. This unique and critical aquatic habitat information should be used in the implementation of your plan.

Our second concern is the language of the objective and the foundation of the USFWS Landscape Conservation Cooperatives (LCCs) infers that NFHP should be consumed by LCCs during the implementation of this Plan. This is of great concern because, while NFHP and the LCCs may share some similarity in aspects of purpose and vision, they differ in focus and implementation. As the Joint Ventures are to birds, NFHP provides a specific and crucial momentum towards landscape scale fish habitat conservation that should not be minimized or overlooked. We are building a strong aquatic constituent base, which have no parallels with the LCCs. This point is driven home by the fact that we are generating at minimum 3:1 matches for federal funds, much of which is provided by external partners. We agree that thinking about landscape conservation collectively is important, but not at the expense of one program or another.

It is also unclear in your plan how these stated goals will be prioritized with budgets and within the 8 USFWS Regions and what the timeline will be for implementation. The Board would welcome an invitation in planning and discussion with your agency on implementation of the Goals and Objectives critical to the NFHP Program.

Finally, as stated in the Conclusions and Next Steps, the success of the Plan lies in the ability of the FAC Program to work collaboratively with partners and stakeholders to realize the Plan's goals and achieve our shared vision for the future. This is no easy task and we as a Board acknowledge that your agency has been pivotal to the success of the NFHP and we want to help your agency make this Plan practical.

The Board appreciates the opportunity to provide comments on this plan and please feel free to contact me, if you have any questions moving forward with the plan.

Thank You,

Kelly R Hepler

Kelly Hepler
Chair, National Fish Habitat Board