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November 30, 2016

Bob Curry, Deputy Assistant Director  
U.S. Fish and Wildlife Service  
Wildlife and Sport Fish Restoration Program  
MS: WSFR  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

RE: Fixing America's Surface Transportation Act (FAST Act)  
Combining Boating Infrastructure Grant and Clean Vessel Act Grant Programs

Dear Bob,

The States Organization for Boating Access (SOBA) appreciates the opportunity to provide recommendations to U.S. Fish and Wildlife Service (Service), Wildlife and Sport Fish Restoration Program on the implementation of the FAST Act's administrative combining of the Boating Infrastructure Grant (BIG) and Clean Vessel Act (CVA) grant programs.

The FAST Act would allow the Service to redirect up to 75 percent of available funds to one of the grant programs. SOBA strongly believes this would be detrimental to the continuity in which states implement and manage the grants received under the programs.

The two programs are managed through a variety of different state agencies from traditional Fish and Wildlife agencies to Department of Health, Tourism, Parks and Recreation and other agencies. Additionally, CVA is typically managed as a program providing a variety of services such as construction, maintenance, education and coordination. In contrast BIG is typically managed on a project level basis. Because of the above, SOBA recommends that the Service strive to operate the programs similar to the historic funding, by allocating 50 percent of available funds to each program.

SOBA understands that in past years the Service has partially funded the next highest ranked BIG Tier II proposal that could not be fully funded with available funds. We would encourage the Service to no longer partially fund a proposal. This practice created issues for the Service, State and grant recipient trying to modify scope and budget but also administer the project.

Thank you for this opportunity to share our concerns and we appreciate the Service's consideration of our recommendations.

Sincerely,

Ron Christofferson  
President

cc: Brad Gunn, USFWS BA, BIG and CVA Lead  
SOBA Board

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