# FWC's Draft Conservation Policy: Summary of Public Comments

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### Outline

- Description of public comment period
- Procedure to process and synthesize comments
- Distribution of comments, by channel
- Comment themes/highlights
- Next steps



### Public Comment Period (April 10-June 30, 2023)

- News release (and Spanish translation)
- Social media posts (and Spanish translation)
- Advisory Groups and Partners Groups notified
- Tribal notification
- March/April Director's Bulletin
- Second news release
- June 22-23 FWC public meeting



### Procedure to process and synthesize comments

- Four 'channels' for public input during the comment period
  - PublicInput online form
  - PublicInput email (accepts letters, pdfs, or emails)
  - Emails sent to agency were forwarded to the PublicInput email account
  - PublicInput voice-mail
  - Fish and Wildlife Commission hearing on June 22, 2023 and public input on June 23, 2023
- We enumerated comments and conducted a subjective analysis by interpreting and categorizing textual/verbal information:
  - We sorted comments into bins: Support and Oppose.
  - We reviewed for unique themes/ideas for potential editing by the FWC.

## Comments by "Channel"

Submittal Method	Number	
PublicInput Online Form	440	
PublicInput Email	1,621	
PublicInput Voicemail	3	
June 22 FWC Hearing and June 23 OPI	37	
Total	2,101	



# Categorization

Submittal Method	Support	Oppose	Other	Total
PublicInput Online Form	*	*		440
PublicInput Email	380	1237	4 (spam)	1,621
PublicInput Voicemail	1	2		3
June 22-23 FWC Meeting	19	18		37



#### General

- Forward-thinking
- Inclusive of all Washingtonians, not just hunters/anglers
- Appreciative that the Commission is pursuing this policy and the holistic approach
- The policy recognizes intrinsic value of wildlife
- Strengthen language even further; add a sense of urgency (to address threats like climate change; habitat conversion)



### Purpose

- Represents Washingtonians who do not hunt/fish; public trust is to conserve wildlife for all Washingtonians
- Proactively acknowledges conservation challenges, and provides pathway to address future challenges

#### Mission

 Preserve and protect should happen first; once populations are sustainable, then opportunities can be provided



#### **Definitions**

- Conservation
  - Encompasses all Washingtonians—consumptive and non-consumptive
  - Support for recognizing 'intrinsic value of nature'
- Ecosystem
  - Write it to be more user-friendly; simplify
  - Acknowledge human presence/impact
- Ecosystem-Based Management
  - Acknowledges complexity of ecosystem and human impacts
- Sustainability
  - Progressive



### **Principles**

- Conservation First
  - Forward-thinking
  - Acknowledges hunting and fishing
  - Prioritizes values of non-consumptive use first
- Conservation of all species, habitats, and ecosystems
  - Supportive of an ecologically diverse system
  - Note exception for invasive species
- Conservation partnerships
  - Promotes collaboration
  - Gives voice to non-hunting/fishing communities



### **Principles, Continued**

- Knowledge and science
  - Supportive of Commission approach to include all scientific disciplines
- Precaution
  - Changes thinking to a holistic approach
- Innovative leadership and solutions
  - Supportive of proactive management; hunting/fishing is a privilege resulting from successful management
  - Add "continually" learn in last sentence
- Aligning mandate, strategy, staff, and budget
  - Moves Department into the current climate to address challenges of today, rather than continuing past efforts

#### General

- Why pursue this? What is 'broken' that this draft policy is fixing? Clarify the purpose.
- Conflicts with Department mandate
- Conflates the word 'conservation' with 'preservation' throughout draft
- Does not acknowledge past contributions to conservation by hunters and anglers and partners
- Use accepted, published definitions of key terms; edit vague terminology used throughout
- Unclear as to what results are expected from this policy and how it would be implemented
- Concerns that this draft is anti-hunting/anti-angling
- Process:
  - Slow down and re-gain trust; the draft itself and the process has been divisive
  - Lack of consultation with tribes



### Purpose

• Is not aligned to existing mandates; conflicts with RCW 77.04.012; conflicts with the Department's purview.

#### Mission

- No mention of managing for sustainable populations for hunting/fishing opportunities
- Departs from the tenants of the North American Model of Wildlife Conservation



#### **Definitions**

- Conservation
  - Too broad in definition; implies actions WDFW cannot achieve in its mandate.
  - As defined, is more 'preservation'-oriented than 'conservation'-oriented
  - Use existing definition of 'conservation' that acknowledges sustainable use/human use
  - Be clearer about how science will be used to inform actions
  - Remove "equitable benefits to nature"
- Ecosystem
  - Does not address human impact/presence in the ecosystem
  - Confusing; overly-broad or too general



### **Definitions, Continued**

- Ecosystem-Based Management
  - Use accepted definition
  - Infringes on other agencies' responsibilities

### Sustainability

- Does not acknowledge human effects/role in sustainability--concern this will result in lack of predator management which will impact health of other game species
- Does not account for recreational, consumptive, or commercial users



### **Principles**

- Conservation First
  - Is not the primary purpose of the Department, as described in the draft policy
  - From a draft policy perspective, this should not be the first-time hunting/fishing appears
- Conservation of all species, habitats, and ecosystems
  - "Preservation" and "conservation" appears to be used interchangeably in policy
  - Too broad and ambitious; "all" is not possible; attempts to capture work not under Department's authority
- Conservation partnerships
  - Good in theory; partnerships have competing priorities and goals
  - Need to acknowledge and prioritize tribal engagement
- Knowledge and science
  - Clarify how Commission plans to support Department science, which kinds of science, and the decision-making process used
  - Does not include or acknowledge local/community knowledge



### **Principles, Continued**

- Precaution
  - Risk, and how it is determined, is not defined
  - Current management practices already consider precautions
  - Conflicts with Principle 4
  - Concern that this gives Commission more authority to override Department science and Department leadership's decisions
- Innovative leadership and solutions
  - Fails to account for success in North American Model of Wildlife Conservation; do not change
- Aligning mandate, strategy, staff, and budget
  - Goes against current Commission duties and authority; appears capable of removing authority from Department decision makers; provides pathway to override science-based decisions



## General Comments (neutral)

- How will policy be implemented and measured?
- How does this policy intersect other Commission policies or Department policies?
- Use word "resident" or "public" versus "citizen" to be more inclusive
- Use published definitions for terms; avoid vague terms



## Next steps

- August: Big Tent Committee deliberation and revision
- October 26-28: FWC discussion and potential adoption of Conservation Policy







### **Questions and Discussion**