

FWC's Draft Conservation Policy: Summary of Public Comments

Margen Carlson, Director of Conservation

January 26, 2024



Outline

- Description of public comment period
- Procedure to process and synthesize comments
- Comment themes/highlights



Public Comment Period (12/18/23-1/12/24)

- News release (and Spanish translation)
- Social media with reminders
- Website banner
- Website hot topic (English and Spanish)
- January FWC meeting



Procedure to process and synthesize comments

- PublicInput online form used for public input during the comment period (accepts letters, pdfs, or emails)
- Feedback also sent via Commission's email and online form
- We enumerated comments and conducted a subjective analysis by interpreting and categorizing textual/verbal information:
 - We sorted comments into bins: Support, Oppose, and Other.
 - We reviewed for unique themes/ideas for potential editing by the FWC.



Categorization

Disposition of comments received by the January 12, 2023 deadline

Support	Oppose	Other	Total
138	280	281	699



Summary of Supportive Comments

General

- Appreciate the Commission is pursuing this policy and holistic approach
- Is needed to link existing 25-year Strategic Plan to implementation
- Clarify what results are expected from this policy and how it would be implemented and evaluated
- Recognizes intrinsic value of wildlife, prioritizes conservation and ecosystem management
- Appreciate science-based decisions



Summary of Supportive Comments

General, Continued

- Appreciate revisions made in this draft to simplify, include “manage”
- Some liked removal of hot button terms, others thought result was watered down and unclear
- Strengthen language further
 - Increase sense of urgency to address threats (e.g., climate change, habitat loss and forest loss)
 - Further prioritize health of species before human uses



Summary of Supportive Comments

Purpose

- Represents all Washingtonians; public trust is to conserve wildlife for all Washingtonians
- Proactively acknowledges conservation challenges, and provides pathway to address future challenges
- Include wording of entire mission under RCW 77.04.012, including sustainable recreational and commercial opportunities



Summary of Supportive Comments

Principles

- Conservation first
 - Forward-thinking and necessary in these times
 - Appreciate inclusion of ecosystem-based management
- Knowledge and science
 - Appreciate inclusion of traditional and local knowledge
 - Strengthen by including “best available science”
 - Supportive of Commission approach to include all scientific disciplines



Summary of Supportive Comments

Principles, Continued

- Risk and uncertainty
 - Strengthen language by including reliance on best available science and using caution in the face of uncertainty or risk
- Innovative leadership and solutions
 - Appreciate language indicates willingness to change direction in light of new information



Summary of Opposing Comments

General

- Concerns the draft is anti-hunting/anti-angling
- Concern policy will result in lack of predator management which will impact health of other game species
- Departs from the tenets of the North American Model of Wildlife Conservation
- Reflects “preservation” intent rather than “conservation”
- Why pursue this? What is “broken” that draft policy is fixing? Clarify the purpose.
- Clarify what results are expected from this policy and how it would be implemented and evaluated



Summary of Opposing Comments

General, Continued

- Unrealistic expectations to reverse historic habitat loss, invasive species, climate change, or to recreate historic conditions
- Conflicts with Department mandate and existing agency POL 5004
 - Include wording of entire mission under RCW 77.04.012 wherever it is mentioned, including sustainable recreational and commercial opportunities
- Use accepted, published definitions of key terms; edit vague language throughout to remove obfuscation
- Lacks meaningful consultation with and acknowledgement of rights of tribes, conservation contributions of hunters and anglers, and private landowners
- Slow down, consider concerns and regain trust; the draft itself and the process have been divisive



Summary of Opposing Comments

Purpose

- Urgency and need is overstated; “crisis” is inflammatory
- Is not aligned to existing mandates; conflicts with the Department’s purview
- Include wording of entire mission under RCW 77.04.012 here



Summary of Opposing Comments

Definitions

- Conservation
 - Use existing definition of 'conservation' that acknowledges sustainable use/human use
 - Remove "intrinsic" value, or include "extrinsic" value, or replace with "essential"
 - Focus on native and natural excludes management of popular game and food fish, and naturalized species
 - Be clearer about how science will be used to inform actions



Summary of Opposing Comments

Definitions, Continued

- Ecosystem
 - Does not address human presence or needs as part of the ecosystem
- Sustainability
 - Does not acknowledge human effects/role in sustainability



Summary of Opposing Comments

Principles

- Conservation First
 - Providing sustainable recreational and commercial opportunity should be the top priority
- Conservation of all species, habitats, ecosystems
 - Too broad and ambitious; attempts to capture work not under Department's authority, or not possible
- Conservation partnerships
 - Inappropriate to only include already-engaged citizens
- Knowledge and science
 - Clarify how Commission plans to support Department science, which kinds of science, and the decision-making process
 - Respect the role of staff scientists
 - Social science is not relevant to the Department's mission



Summary of Opposing Comments

Principles, Continued

- Risk and uncertainty
 - Concern this gives Commission more authority to override Department science, based on personal beliefs rather than the science of sustainable use
 - Implies there must be perfect certainty before approving human use, should rely on approved scientific methods
- Aligning mandate, strategy, staff, and budget
 - Include wording of entire mission under RCW 77.04.012 here
 - Goes against current Commission duties and authority; appears could remove authority from Department decision makers; and provides pathway to override science-based decisions





Questions and Discussion