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January 12, 2024

Washington Fish and Wildlife Commission  
PO Box 43200  
Olympia, WA 98504-3200

Re: Draft Conservation Policy C-700X (Draft Version 12/15/23)

Please accept the following comments on behalf of the Stevens County Board of County Commissioners and the over 43,000 citizens we represent.

We OPPOSE this policy and ask that you reject adoption. Below are just a few of our objections to this draft policy.

Words matter when making or adopting policy, and we find that your proposed policy is contrary to law, especially the wording and intent of RCW 77.04.012 which you cite in your purpose statement. For example, your policy states "As trustees tasked with managing fish and wildlife resources in the public trust, conservation of fish, wildlife, and habitat is the paramount responsibility of the Washington Department of Fish and Wildlife (WDFW). RCW 77.04.012 in part states "The department shall conserve the wildlife and food fish, game fish, and shellfish resources **in a manner that does not impair the resource.**" These last few words are left off your policy draft and are highly important. The current actions of the Commission are impairing the resource and ignoring science and the public. The law goes on to say, "The commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens, including juvenile, disabled, and senior citizens." Conservation by itself does not eliminate hunting and fishing opportunities, yet this policy is attempting to do just that.

Further in your draft purpose statement you go on to say, "We recognize that humankind is in the midst of a biodiversity extinction crisis and we must continue to act while we still have the building blocks for success." We take that to mean "Humans" as the cause for animal lose and destruction and habitat loss. We would remind the commission that humans are as much a part of the natural ecosystem as are all other animals. We will also state that some of the current actions or inactions of the commission has made this situation more pronounced. The ratio of predators to prey while favoring predator management has grossly impacted the prey species population. Science and the public have both been point out this mismanagement in vast areas throughout the state, yet the commission ignores this.

This policy must be consistent with the law, and we believe you have missed the mark in the purpose section, let alone other points we will draw to your attention.

Your definition of conservation is most troubling. You state “Conservation – Science-informed actions to perpetuate the health, resilience, and intrinsic value of native species and natural ecosystems.” We have underlined the parts that are most inaccurate or troubling. First, “science informed actions.” We agree with this part of the definition but call your attention to the inaction of the current commission to follow current policy and law that requires you to follow the science. The commission was told repeatedly by the scientist and wildlife specialist within the department and outside of WDFW that a Spring black bear hunt was beneficial, yet the commission has eliminated the season. We simply ask that you follow the science as pointed out in existing policy and law. Now we move on to the part of the definition which should be eliminated. “Native species and natural ecosystems” are not part of any definition I could find in several dictionaries, or part of the law which the commission is bound to follow. Further, we do not believe it is possible for the commission to have the knowledge to know what is “native” or “natural” in the state of Washington. There are many species that the commission currently manages for which there is no record they existed in Washington. Moose in Northeastern Washington is but one example. They were introduced into this area by WDFW years ago. We would hate to see this species eliminated, but according to this policy, the commission would need to search all historical records and prove by science they were here naturally or natively. This is not the commissions duty under the law and seems to be part of an agenda that is not the commissions job. We simply ask that IF a policy is to be adopted on this subject, that you use a common or science-based definition and not an agenda driven definition.

Principle number 2 “Conservation of all species, habitat, and ecosystems” needs to be reworked. We do not dispute that the department and hence the commission have a role to play in “habitat” management, but the commission is not the sole entity that has “land-use” decision making authority. Nor does the commission’s decision on land use trump local elected officials authority delegated by the legislature. The principle goes on further to state that the commission is to manage through “ecosystem-based” management. This would mean that rather than maintaining numbers of particular animals for the benefit of recreational hunting and fishing, the ecosystem comes first. This directly contradicts the mandate in RCW 77.04.012 that the commission must follow. In other words, we recognize this language to mean that all hunting and trapping must stop. This principle is wrong and must be eliminated from any policy.

We could go on further, but there is just more of the same agenda driven language that is divisive and contrary to law.

We believe we have made our point that this policy should be rejected.

Respectfully,

BOARD OF COUNTY COMMISSIONERS  
STEVENS COUNTY, WASHINGTON



Wes McCart, Vice-Chair

Cc: Senator Short, Representative Kretz, Representative Maycumber