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Best Available Science Policy

[bestavailablesciencepolicy@publicinput.com](mailto:bestavailablesciencepolicy@publicinput.com)  
[commission@dfw.wa.gov](mailto:commission@dfw.wa.gov)

C/O Washington Department of Fish and Wildlife  
Natural Resources Building  
1111 Washington St. SE  
Olympia, WA 98501

Re: Best Available Science Policy

Dear Commissioners and Director Susewind:

On behalf of Safari Club International (SCI), I would like to thank you for the opportunity to comment on the proposed Best Available Science Policy. SCI, a national and international conservation advocacy leader, believes that sound science-based conservation involving hunting as the primary management tool, while maximizing sustainable opportunities for all huntable species, is necessary to the long-term health of wildlife. Hunters have long paid the way for science-based conservation, both game and non-game wildlife, and maximizing opportunity for hunting is also key to long-term funding for all conservation. Hunting benefits science-based wildlife conservation. With that hunting advocacy background focusing on scientific-based conservation policy, SCI, its chapters and members, also invest significant resources in science-based research directly as well as through the Safari Club International Foundation (SCIF), conducting peer-reviewed wildlife research and funding wildlife conservation projects, both nationally and internationally.

On its face, a policy on the use of best available science in decision making seems prudent and innocuous. In practice however, we find several issues of concern and would recommend that the commission not adopt this proposed policy. Should the commission disregard that advice and decide to proceed however, SCI objects to the following provisions:

Paragraph (b), last sentence, is yet another veiled attempt to solidify the precautionary principle in wildlife management with “the risk of no action” in the face of sometimes unanswerable questions or questions without one hundred percent certainty in answers, as we have previously seen with this commission. The commission already has the ability to vote no on proposals but that statement has no place in this policy.

Paragraph (e), regarding the professional experience of the commissioners and placing it on par with the scientific and professional evaluation and recommendations of the professional staff of the department is erroneous at best. To pretend that commissioners have the same amount of knowledge that a staff member who has studied a single species for their entire career is ludicrous. Additionally in paragraph



(e), the use of social values is entirely subjective and should be severely limited in use or stricken from the document.

Paragraph (f) appears to be an end around for open meetings laws by meeting privately in groups with staff where the public cannot shine light on decision making processes as well as providing for the venue to change or coerce department staff positions or recommendations that conflict with differing opinions of commissioners. Additionally, the section provides that commissioners may provide additional references or information. This should be done early in the regulation process so the department's staff may properly vet the information and to be clear, just because a commissioner submits information, that does not mean it is peer-reviewed, valid or even scientific.

In summary, SCI opposes the creation of the Best Available Science Policy and encourages the commission to listen to and learn from the experts they have at their disposal within the department. SCI is dedicated to protecting the freedom to hunt and we appreciate the partnership with the Agency and the Commission. SCI is always First For Hunters.

Sincerely,

Benjamin Cassidy  
Executive Vice-President of International, Government, and Public Affairs  
Safari Club International