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WA Wildlife Commission Approves Six-Year Game Management Plan Without Meaningful Consideration or Environmental Review

Olympia, WA – The Washington Fish & Wildlife Commission [yesterday](#) voted unanimously to approve the Washington Department of Fish and Wildlife’s (WDFW) new [Game Management Plan](#) (GMP), setting aside the extensive concerns raised during the public comment process about the plan’s scientific deficiencies and the agency’s failure to conduct any meaningful review of its impacts under the State Environmental Policy Act (SEPA).

The vote follows a 60-day public comment period that concluded on September 5, 2025, during which WDFW received over 60 comments from individuals, Tribes, and organizations. During [last month’s Fish & Wildlife Commission meeting](#), WDFW’s Game Management Division staff briefed the Commission on the final draft of the GMP. That meeting was notable for the absence of any meaningful discussion of the public’s substantive concerns.

Before today’s vote, several commissioners expressed misgivings about WDFW’s failure to consider the far-reaching impact of the GMP on Washington’s wildlife, as SEPA requires.

They all voted to approve the GMP anyway.

“I was disappointed to see all the commissioners rubber-stamp the GMP even though many of them seemed to know better,” said Dr. Francisco Santiago-Ávila, Science & Advocacy Director for Washington Wildlife First. “The Commission abrogated its responsibility, plain and simple. This was a clear governance failure.”

The GMP is WDFW’s foundational document for managing all trapped and hunted wildlife statewide. It guides the development of multi-year hunting season packages and shapes policies affecting dozens of species — from commonly hunted species such as deer, elk, and upland birds to large carnivores and species that WDFW classifies as vulnerable, declining, or in need of conservation attention, like mountain goats, bighorn sheep, and harlequin ducks.

In 2002, 2008, and 2014, WDFW completed an Environmental Impact Statement for its GMP. Without any rationale, the agency suddenly decided this year that the plan no longer has a significant impact on wildlife and ducked its responsibility to prepare an EIS.

“Although management has implied that review would occur at some next stage, the reality is that there is no next stage,” said Santiago-Ávila. “Now that the commission has approved the GMP without any real analysis, the question becomes: when will those impacts ever be examined? The honest answer is:

never. The Commission’s willingness to overlook these consequences shows a baffling lack of accountability.”

Washington Wildlife First and coalition partners also identified substantive deficiencies in the GMP. As detailed in [our formal comments](#), the GMP lacks transparency about how management objectives are set; relies heavily on limited hunting/trapping data and incomplete monitoring; fails to establish clear safeguards for disease, genetics, and habitat connectivity; and avoids a meaningful assessment of the impact of climate change. Its guidance largely focuses on population abundance, without assessing broader effects on wildlife behavior, social structure, ecological dynamics, ecosystem function, habitat, or human-wildlife coexistence.

“An ethical wildlife plan cannot only look at headcounts,” said Santiago-Ávila. “Wildlife populations are complex behavioral, social, ecological, and genetic systems living in a rapidly changing world. Robust wildlife policy should consider how hunting affects all of those dimensions, and advise caution when there’s any uncertainty about them. This Plan does neither.”

Washington Wildlife First is evaluating whether to mount a legal challenge against the GMP.

“WDFW management frequently complains about our lawsuits and attempts to use them as a reason to shut us out of the process,” Santiago-Ávila said. “We would be relieved to stop bringing legal actions against the agency if it would simply follow the law, but blatant violations like this one leave us with little choice.”

However, even if a legal challenge were successful, it might not force the agency to complete the required EIS—the Court might simply allow WDFW to continue without a GMP in place. It has already operated that way for 5 years, since the last GMP expired in 2021.

“For years, WDFW Director Kelly Susewind has refused to order his agency to complete an EIS on major plans impacting our fish and wildlife, suggesting a deliberate scheme to hide the impacts of the agency’s actions from the public,” Santiago-Ávila said. “We can keep going to Court, but that will not address the root problem of a lawless agency. At some point, the Commission is going to have to find the courage and commitment to stand up and do its job.”

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