



Washington Fish & Wildlife Commission Meeting

August 13-15, 2026, Long Beach, Washington

Open Public Comment Talking Points

I. Overview

Thank you for speaking on behalf of wildlife during the August 13-15, 2026, Washington Fish & Wildlife Commission meeting in Long Beach! As discussed below, the meeting [agenda](#) includes several important fish and wildlife topics, but during open public comment you are welcome to speak about *any* wildlife issue that is of importance to you. These talking points include suggestions for discussing agenda items and other current issues.

II. Registration and Attendance

- The public may testify on any wildlife-related topic, in person or via Zoom, **during open public comment**, which starts **roughly 8:30 a.m. on Friday, August 14, and at 8:00 a.m. on Saturday, August 15.**
 - If you plan to testify in person during open public comment, we recommend arriving by 7:45 a.m., so you can be seated before the meeting begins. Testimony sometimes begins early, and the people attending in person always speak first, so you don't want to be late.
 - If you plan to speak via Zoom, please make sure you are on the Zoom link with your name clearly displayed before testimony starts, or you may not be called upon.
- **You must [register](#) in advance in order to speak.** The deadline to register **to testify via Zoom is 5 p.m. the day before** the meeting at which you wish to speak, and if you are attending in person, you must register at least 15 minutes before the beginning of the agenda item on which you want to testify. **However, slots often fill up within hours of the agenda being released, so we urge you to register as soon as you can to ensure you have a chance to testify!**
 - Register at this [link](#). Select **Item 2** to testify during Friday morning open public comment and **Item 9** for open public comment on Saturday.
 - On the day of testimony, people testifying remotely will need to join via the appropriate Zoom link for Friday or Saturday (see the agenda for links).

III. General Guidelines

Whatever you choose to discuss:

- Please begin your testimony by telling the Commission who you are and either: (1) where you are from in Washington; (2) what Washington organization you work with (IF staff or volunteer); and/or (3) how you are connected to or knowledgeable about the issue on which you choose to speak.
- Personalize your remarks. The Commissioners want to hear about what is important to you, not talking points prepared by someone else. **Feel free to use information or ideas from our talking points below, but please make your testimony your own.**
- Your comments will probably be limited to three minutes. For an average speaker, this means 250 to 300 words. To eliminate stress, consider practicing your testimony ahead of time and timing yourself. You should not feel pressured to use up all your time. Commissioners appreciate people who are concise and to the point.
- Be courteous. The commissioners are volunteers with a very difficult job. Thank them for their service and for listening to your remarks. You may certainly express support or disagreement with commission(ers') actions, but avoid any language that could be construed as insulting, demeaning, or threatening. Failure to follow these rules might result in a reprimand or your testimony being cut off. Remember, your behavior reflects on all fish and wildlife advocates.

- Focus on issues. You may hear other speakers attack commissioners, individual wildlife advocates, and/or advocacy groups. Please do not be distracted by these attacks. **Take the higher ground and keep your remarks focused on the issues you want to address.**

IV. Power, Speech, and Who Belongs in Wildlife Policy.

A. Background

Recent events surrounding Washington Department of Fish and Wildlife (WDFW) leadership, including a recently filed [federal civil rights lawsuit](#) alleging retaliation against commissioners and wildlife advocates for protected speech, have raised serious concerns over how agency decisions are being made, whose voices are being heard, and whether public participation is being treated fairly. As the Commission meets in Long Beach this August, many Washingtonians are paying close attention, not because they follow every detail but because they expect honesty, fairness, and accountability from a public agency. What we are seeing right now falls short of that. These talking points highlight those concerns, so people can speak clearly about what matters: protecting wildlife, ensuring fair participation, and restoring trust in the process.

B. Suggested Talking Points

- **Most Washingtonians want wildlife protected, not managed for a narrow set of users:** The vast majority of people in this state do not hunt or fish, but they care deeply about wildlife and expect it to be protected. Yet agency decisions continue to prioritize consumptive use as if it were its primary obligation. It is clearly not. Treating wildlife as if it exists mainly for a small subset of users ignores what most Washingtonians value and expect, and shows up in decisions that fail to reflect the broader public the agency is supposed to serve.
- **Leadership is responding to criticism with retaliation and discouraging public participation:** Recent reports, including the recently released report of the independent investigation commissioned by Gov. Ferguson at the request of WDFW Director Susewind, describe leadership directing agency resources to go after commissioners and members of the public who criticized their decisions. That is not oversight; it is retaliation. When criticism triggers targeting instead of accountability, it sends a clear message: speaking up comes with grave consequences. That is precisely how participation gets suppressed, and it has no place in a public agency.
- **Wildlife advocates are being singled out and leadership is deciding who “belongs”:** Communicating, organizing, and advocating are normal parts of the democratic process. Yet when wildlife advocates do it, it is treated as suspicious or improper, while the same behavior by hunting, fishing, and industry groups is treated as routine, and even encouraged (like the department's program to retain, reactivate, and recruit hunters, without any similar program for, for example, wildlife watchers). That is not neutrality. It is clearly discriminatory. Public officials do not get to decide which members of the public are legitimate participants in decisions that affect everyone. They are expected to serve everyone.
- **Wildlife is a public trust and current practices ignore that obligation:** State law is clear: wildlife belongs to all Washingtonians. It does not belong to those who exploit it, profit from it, or live near it. Any system that centers decision-making around a narrow set of interests is not just unbalanced, it fails the basic obligation to manage wildlife for the full public.

- **This reflects a broader failure of leadership:** Fairness, transparency, and equal treatment are not optional—they are the expectation. When leadership applies rules selectively, treats viewpoints differently, and responds to criticism with pressure instead of accountability, that is not a gray area. It is a failure to meet basic responsibilities.
- **The Commission must act to restore accountability and trust:** The Commission’s role is oversight. That means stepping in when leadership crosses lines, not deferring to it. A full, independent, and transparent investigation of the Director and Deputy Director is necessary, and it must lead to real accountability. Without that, trust will continue to erode—and rightly so.

V. Washington's Wolves Deserve Better: It's Time to Fix Wolf Conflict Management.

A. Background

Washington's current approach to wolf–livestock conflicts is failing both wolves and the public. Despite overwhelming scientific evidence that proactive, non-lethal measures are the most effective way to prevent conflicts, WDFW continues to kill endangered wolves for the benefit of the beef industry, often in the same areas and for the same producers year after year. At the same time, a loophole in state rules allows private individuals to kill wolves that are allegedly “attacking” cattle, even when wolves are *not* physically attacking animals. Public records documented in [our coalition's 2023 rulemaking petition](#) show wolves being legally shot while merely approaching pastures or standing dozens of yards away from cattle, and this remains the case. In January, the Commission agreed to pursue rulemaking on this issue, and that process will begin this month with a briefing to the commission’s Wildlife Committee on Thursday, August 13 at 3pm. This is an opportunity to create a more transparent, science-based system that prioritizes prevention, protects wolf families, and ensures wolves are not killed unnecessarily.

B. Suggested Talking Points

- **Require prevention, not repeated killing:** Decades of research show that proactive, non-lethal measures are the most effective way to reduce wolf-livestock conflicts. The Commission should *require* meaningful use of proven deterrents before lethal control is even considered and ensure that killing wolves never substitutes for responsible livestock management.
- **The science does not support wolf-killing as a conflict-prevention strategy:** Research from across North America has found that killing wolves often fails to reduce future livestock losses and may actually increase them. Accordingly, Washington has spent years killing wolves in the same places for the same livestock operations (around 80% of those wolves killed on public lands), yet conflicts continue to occur. The Commission should align its policies with the best available science rather than assumptions about what “should” work.
- **Protect wolf families and pack stability:** Wolves live in closely bonded family groups. Research suggests that killing wolves can disrupt pack structure, orphan pups, and increase the likelihood of future conflicts by removing experienced adults and destabilizing social groups. New rules should prioritize keeping wolf families intact whenever possible.
- **Close the “caught-in-the-act” loophole:** Wolves should only be killed without a permit when they are actively engaged in a physical attack on livestock. Simply approaching,

observing, pursuing, or being near livestock when the latter graze in prime wolf habitat should never be enough to justify killing an endangered wolf.

- **Promote coexistence through accountability and transparency:** The Commission should require a prevention-first approach that emphasizes coexistence, requires clear justification for any lethal action, and provides timely public reporting. Washingtonians deserve to know whether management actions are actually reducing conflicts—or simply perpetuating an endless cycle of killing.

VI. Strengthening Washington's Species Protection Framework.

A. Background

[WAC 220-610-110](#) establishes how Washington classifies and reviews endangered, threatened, and sensitive wildlife species. While it provides an essential framework for identifying species at risk, the rule offers limited safeguards to ensure that listing decisions consistently follow the best available science, that candidate species are protected while under review, and that recovery efforts are implemented and evaluated effectively. Updating the rule presents an opportunity to strengthen transparency, accountability, and the precautionary approach needed to conserve Washington's wildlife in the face of ongoing habitat loss, climate change, and other growing threats.

B. Suggested Talking Points

- **Strengthen the precautionary approach:** The current rule leaves substantial discretion in listing decisions, even when scientific evidence shows a species is declining. Where uncertainty exists, the rule should err on the side of protecting species before they become endangered, rather than waiting until recovery becomes more difficult and costly. Species can also continue declining while they are under review for listing. Consider establishing interim conservation measures for candidate species until the Commission reaches a final decision.
- **Increase transparency when science and policy diverge:** The rule requires science-based recommendations, but the Commission ultimately makes the policy decision. When Commission decisions differ from agency recommendations or the weight of the scientific evidence, or are not in alignment with recovery plan objectives, the rule should require written findings explaining the basis for that decision. This would improve transparency and public confidence.
- **Increase accountability for recovery:** While the rule requires periodic status reviews, it says little about whether recovery actions are actually being implemented or achieving measurable outcomes. Reviews should assess not only population status, but also progress toward recovery objectives, threat reduction, and the effectiveness of management actions.
- **Clarify how climate change and cumulative threats should be evaluated:** Current reviews often discuss climate change and habitat loss, but the rule could explicitly require consideration of cumulative and emerging threats—including climate change, landscape fragmentation, invasive species, and disease—to ensure consistent evaluations across all species.
- **Require periodic review of recovery plans—not just species status:** The WAC requires periodic review of whether the species should remain listed, but it does not require periodic

review or updating of the recovery plans themselves. Some recovery plans are decades old and may no longer reflect the best available science, current threats, or changing climatic conditions. A requirement to periodically review and update recovery plans would help ensure conservation actions remain effective over time.

- **Work with the Legislature to strengthen protections for imperiled wildlife:** Updating WAC 220-610-110 is an important step, but administrative rules can only go so far. Revising this WAC can improve how Washington identifies, reviews, and recovers at-risk species, but it cannot by itself create many of the substantive protections wildlife need. Administrative rules are limited by the authority granted in statute and cannot establish broad habitat protections, create new conservation programs, or significantly expand legal safeguards beyond existing law. As federal wildlife protections continue to weaken or disappear, Washington has both an opportunity and a responsibility to establish stronger statutory protections for at-risk species, their habitat, and the recovery measures needed to ensure their long-term survival.

VII. Maintain State-Endangered Status for the Streaked Horned Lark.

A. Background

Once widespread in western Washington, the streaked horned lark is now restricted to a few airports, military training areas, coastal sites, and lower Columbia River islands. WDFW estimates that approximately 600 individuals remained statewide in 2023, while more than 90% of prime Puget Lowlands prairie habitat has been lost. Although intensive management has produced gains at some sites, the population remains small, fragmented, and vulnerable. [WDFW's 2026 Periodic Status Review](#) concludes that the lark continues to meet the criteria for state-endangered classification and remains at high risk of extirpation.

B. Suggested Talking Points

- **Thank Department staff for following the science:** We appreciate WDFW staff's careful review and [recommendation to maintain the lark's endangered status](#). Their conclusion is well supported by the species' constrained population, limited habitat, and persistent threats.
- **A population of 600 remains dangerously vulnerable:** The remaining populations are isolated, have low genetic diversity, and exhibit extremely limited breeding dispersal between regions. These conditions restrict genetic exchange and make recovery from local losses difficult.
- **Local progress is not statewide recovery:** Breeding pairs at Joint Base Lewis-McChord have approximately doubled since monitoring began in 2013, demonstrating that protections and active management work. But JBLM supports roughly 75% of the South Puget Lowlands population, and the region's female population growth rate is still declining slightly. Such concentration increases—not resolves—the species' vulnerability.
- **The causes of decline have not been removed:** Habitat loss and encroachment, predation, nest disturbance, aircraft collisions, pesticides, and climate-related habitat changes remain ongoing threats. Reintroduction is still in the planning stage, and existing populations continue to require habitat restoration, monitoring, nest protection, and site-specific management. Endangered status should remain until recovery is secure across multiple resilient populations.

VIII. Cougars Deserve Better: It's Time to Move Beyond “Lethal First” Management.

A. Background

Washington's cougar policy has improved in recent years, thanks in part to Commission actions that require all independent-age, human-caused cougar mortality to count toward mortality limits and strengthen mechanisms to ensure those limits are enforced. However, [recent investigative reporting](#) and [decades of peer-reviewed research](#) show that the Department continues to rely too heavily on lethal responses to conflict and allows mortality levels near the upper edge of what the science suggests cougar populations can sustain. Research has repeatedly found that heavy cougar mortality can disrupt cougar society, orphan young, increase turnover of inexperienced animals, and in some cases *increase* human-cougar conflicts. The Commission has both the authority and responsibility to ensure cougar management reflects its duty to preserve, protect, and perpetuate wildlife for all Washingtonians, while promoting coexistence, transparency, and accountability.

B. Suggested Talking Points

- **Require non-lethal interventions before lethal removal:** The Department should not default to killing cougars when conflicts arise. In all but true emergencies, the Commission should require meaningful non-lethal interventions, professional assessment, and documented efforts to prevent future conflicts before lethal removal is considered. The goal should be to solve the underlying causes of conflict, not simply remove animals after complaints/conflicts occur.
- **Protect cougar families and social stability:** Research conducted in Washington has shown that heavy mortality can destabilize cougar populations by removing resident adults, increasing turnover, orphaning dependent young, and creating opportunities for younger, less experienced cougars to move into vacant territories. The Commission should provide greater protections for resident adults and females with dependent young and recognize the scientific fact that cougar social structure (not just overall numbers) is an important component of population health.
- **Adopt a precautionary approach to cougar mortality:** Current cougar mortality levels remain near the upper limit of what available science suggests populations can sustain. When uncertainty exists, the Commission should prioritize protection, not maximum allowable killing. Precaution should mean safeguarding cougar populations and their ecological roles when data are incomplete or uncertain, rather than stretching mortality limits to their highest defensible level for the sake of “recreational opportunity”.
- **Demand transparency and accountability for cougar deaths:** Washingtonians deserve to know how many cougars are being killed, why they are being killed, where removals occur, and whether those actions are actually reducing conflicts. The Commission should require transparent, timely, and publicly accessible reporting of cougar complaints, investigations, lethal removals, and all sources of human-caused mortality so the public can evaluate whether management actions are achieving their stated goals.
- **Ensure cougar management is guided by independent science:** Cougar management should be informed by the best available science, whether it comes from inside or outside the Department. Independent scientific review of mortality limits, conflict-management policies, monitoring methods, and management assumptions would strengthen public trust and help

ensure decisions reflect current knowledge rather than institutional inertia or political pressure.

- **Manage for coexistence, not fear:** Most Washingtonians will never hunt a cougar, yet many care deeply about protecting wildlife and ensuring healthy ecosystems. The Commission's responsibility is not simply to respond to fear or demands for more killing, but to steward wildlife held in trust for all residents. Cougar management should reflect public values that emphasize cougar well-being, coexistence, respect for wildlife, and ecological function.

IX. Southern Resident Orcas Are Still On The Brink.

A. Background

We think the Commission cannot be reminded too often about the crisis facing this critically endangered population. You could speak on this issue during open public comment on either Friday or Saturday morning. The population has continued to decline, with only **74 individuals remaining**. This is not because we lack information on how to save them—researchers have spent decades gaining this knowledge and making recommendations. It is because our state officials lack the political will to act on this information.

B. Suggested Talking Points

- **Highlight the crisis:** Southern Resident killer whales are on the brink of extinction, with a dwindling population with few reproductive females or calves who reach adulthood. The remaining killer whales face many serious challenges to their survival, and the state's slow response and fragmented management have been insufficient to respond to these challenges. It is incumbent on Commissioners to show leadership in responding to this crisis; history will judge them harshly if they fail to rise to the occasion.
- **We know what needs to be done to save the Southern Residents; we just lack the political will to do it:** Decades of research have informed scientific recommendations on how to address this crisis. Last summer, a comprehensive report by a team of scientists, [*"Strengthening Recovery Actions for Southern Resident Killer Whales,"*](#) outlined the steps urgently needed to prevent extinction. Now we need strong leaders who are willing to embrace these recommendations and take necessary action before it is too late.
- **WDFW's "Orca Prey Initiative" will not stop the decline of the Southern Residents:** Unlike other orcas, the Southern Residents have a highly specialized diet, relying almost exclusively on large, mature, energy-dense Chinook salmon. Lack of sufficient prey is a primary driver of their decline. Purportedly to address this issue, the Commission approved the "Orca Prey Initiative" to increase the production of hatchery salmon by at least 50%, or at least 50 million additional salmon each year. In doing so, the Commission ignored the fact that hatcheries are unlikely to produce the large, mature salmon the Southern Residents need to survive. The Commission also ignored the overwhelming scientific consensus showing that large-scale hatchery production has harmed, and will continue to harm, endangered and threatened wild salmon populations. In reality, the true goal of the Commission's Orca Prey Initiative is to expand the salmon population available for human consumption, and provide "mitigation" to allow the continuation of destructive fishing practices that are driving the decline of both our salmon and our orcas. And the grim reality is that WDFW's reckless

expansion of hatchery production may doom both endangered and threatened salmon and the Southern residents who rely on them.

- **Implement fishing restrictions:** The shortage of sufficient prey for the Southern Residents can only be addressed by implementing tighter restrictions on commercial and recreational fishing. These restrictions need to not only address how many Chinook salmon are taken, but also, when, where, and how this fishing is done. An emphasis on selective fishing methods will allow anglers to focus on removing hatchery salmon who could weaken the genetic fitness of the broader population, while leaving wild-born Chinook salmon to mature and fill their niche in the ecosystem. And a focus on so-called “terminal fisheries” that remove salmon only when they are returning to their rivers of origin would ensure that salmon have time to mature in the ocean and that the Southern Residents get first crack at them. None of these changes will be easy, and they will require coordination with federal, state, and Tribal partners. But the Commission can start down this path now by expressing its determination to make these hard choices and do what is necessary to reverse the decline of the Southern Residents.

X. Beavers Need More Than Guidance: Washington Still Lacks a Real Coexistence Plan.

A. Background

WDFW’s new [*Beaver Habitat Best Management Practices*](#) document is a positive step in that it recognizes beavers as ecosystem engineers and climate allies, highlights their benefits for wetlands, salmon, riparian habitat, and wildfire resilience, and recommends coexistence tools such as tree protection, culvert fencing, and water-level control devices before relocation or lethal control. But the document remains only guidance. It does not create enforceable standards, require coexistence measures before removal, strengthen reporting or accountability for conflict kills, protect relocated beavers from later trapping or killing, or establish priority areas where beavers and the habitat functions they create should be retained. Just as importantly, it still largely treats beavers in instrumental terms—as valuable for what they do—rather than as family-oriented, highly capable animals whose own lives, well-being, and continued presence on the landscape deserve respect and protection. In short, it improves the Department’s language and technical recommendations, but **it still falls far short of the comprehensive statewide beaver coexistence plan Washington needs.**

B. Suggested Talking Points

- **The new beaver guidelines are a good start, but they are not enough:** We appreciate that WDFW now recognizes beavers as ecosystem engineers and climate allies, and that coexistence is often better than removal. But recommendations alone are not enough. Washington needs a binding, statewide beaver coexistence plan with real standards, protections, and accountability.
- **Require coexistence first, not killing first:** If the Department recognizes that repeated removal is often ineffective and that non-lethal tools can work, then coexistence measures should be required before relocation or lethal control in all but true emergencies. Education, technical assistance, tree protection, culvert protection, and water-level control devices should come first.
- **Beavers deserve respect and protection in their own right:** Beaver policy should not focus only on ecosystem services and infrastructure impacts. Beavers are not just water-storage

devices or habitat tools—they are living beings with agency, family bonds, and their own well-being at stake. A responsible policy should respect not only what beavers provide to habitats and people, but also their own lives and continued ability to live and thrive on the landscape.

- **Protect relocated beavers and improve accountability for beaver killings:** The guidelines prefer relocation over lethal removal, which is important, but relocated beavers still need meaningful protections and follow-up monitoring if relocation is to be taken seriously. Washingtonians should also know how many beavers are being killed, where, by whom, and under what circumstances. The Commission should strengthen protections for relocated beavers and improve reporting and public accountability for all beaver removals.
- **Manage for living systems, not just numbers on paper:** The key question is not only how many beavers remain statewide, but what happens to wetlands, floodplains, fish habitat, fire refuges, and beaver families when they are removed from specific places. The Commission should direct WDFW to prioritize retaining beavers where their habitat functions matter most and to manage with both beaver well-being and ecological function in mind.