

Conservation Affairs Network Policy Toolkit

SECTION 3: TAKE ACTION ON POLICY

3.1 CRAFTING YOUR MESSAGE

There are many ways to take action on policy or legislation development, but it all starts with a clear, consistent, and concise message crafted for the right audience. Use the guidelines below to help craft your message for maximum impact. Many of these guidelines are targeted at engagement with legislative offices, but can also be used when interacting with other decision makers and partners.

Use these questions as a guide to forming your messages:

What do you want the decision maker to do?

See if you can summarize it in just one sentence. Be as concrete and specific as possible.

• How do you want them to do it?

Be clear and specific about what you think the appropriate course of action entails.

How does this issue relate to you?

What effect has this issue had on your job as a wildlife professional? Remember that the point of telling your story is to put a face on the issue and to educate the policy maker on the impact of the issue on your life and our public trust wildlife resources.

• Are others affected by this issue? If so, how?

Describe how this issue impacts others who enjoy, rely upon, or are otherwise impacted by our wildlife resources. Relate the issue back to the broader constituency, and explain how it will impact ecosystem services, the economy, private landowners, wildlife recreationalists, etc. Consider any of the possible links to the issue below:

- This is an area of personal interest to the decision maker (they enjoy wildlife)
- For legislators, they serve on a legislative committee that would cover this issue
- There is the possibility of getting positive press coverage
- A large number of constituents in a legislative district or administrative region are affected
- List the key points that the decision maker must know to understand the issue and its impact.

Try to limit your key points to no more than three on any issue. Remember that your time and their interest are limited.

Policy Consultation for CACs

TWS staff is available to provide consultation assistance to CAC's to help determine the best ways to engage with wildlife policy issues, or to help determine the most effective ways for organization units to support TWS' advocacy efforts at the federal level. If you're interested in policy consultation, contact policy@wildlife.org.

3.2 MEETING WITH DECISION MAKERS

Meeting with legislators and agency administrators can be a very effective method of advocacy. While more time-consuming than simply writing a letter, in-person meetings provide several advantages; face-to-face time with decision makers and/or their staff is extremely valuable to your efforts.

Benefits of a Meeting

Meetings with decision makers provide four main benefits:

1. Personal conveyance of your position on the issue to decision makers

A face-to-face meeting allows you to have an actual conversation about the topic. You will be able to express your passion and personal insights from working in the wildlife field. These meetings allow prompt discussion about specific details, concerns, and potential solutions.

2. Raise attention for the issue in that decision maker's office and provide valuable education on the subject

Meetings may aid greatly in raising the profile of the wildlife policy issue in the office. They will take the time to listen to you and will do their best to understand the issue. Meetings enable you to educate the office on the topic and leave behind additional information.

3. Obtain a better understanding of the decision maker's perspectives, priorities, opinions, and approach regarding your policy issue.

A meeting allows you to have a two-sided conversation. Rather than simply being able to state your perspectives as you would in a letter, you will also get a chance to ask about and listen to the thoughts and perspectives of the decision maker. This provides valuable insights into how they feel about the subject, whether or not they might support your efforts, and whether or not they really see this as a priority item that warrants pursuit.

4. Establishment of a trusting relationship with the decision maker's office.

Trust is built over time – and trust can go a long way in the policy world. Face-to-face meetings allow you to really make progress in building a working relationship with the office. Meeting discussions build understanding and allows for open dialogue – through relationship building, you can start to find ways to work together to address the issues.

Which Offices to Meet

Since face-to-face meetings require more of your time and potentially more of your resources, you want to be sure to make them as worthwhile as possible. To do that, you need to strategize on who would be the best person or best office to meet with. Remember, while you may be meeting with office staff as opposed to legislators or decision makers,



these individuals are still helpful in building support and influencing the position of their employer. Look to meet with someone who:

- 1. Is in a position of power that can move your issue forward
- 2. Has the potential to support your issue, but doesn't currently
- 3. Supports your issue, but could use some encouragement to continue doing so or address it in a new way

Generally speaking, it is not overly helpful to spend time meeting with people who are adamantly opposed to your issue and have made several public statements opposing your desired action. These individuals will be a tough sell in getting them to switch their positions publicly. But if you have the extra time it doesn't hurt to try to change their minds!

People in powerful positions within legislatures usually include Majority and Minority Leaders and Committee Chairs and Ranking Members. You also have some good leverage when meeting with your own elected representative, as you are their constituent. If you are initiating a new concept, or want to have a general meeting, try meeting with a legislator who has a personal connection to wildlife in some way (hunter, birder, hiker, etc.) that will likely be supportive of your efforts.

For federal-level offices (i.e. the House of Representatives and Senate in the U.S., and the Senate and House of Commons in Canada), you should meet with offices that overlap directly with the geographic footprint of your TWS unit.

Within a government agency, you should try to meet with someone as high up as possible that oversees the wildlife management or policy regulation you wish to discuss. This will likely include program directors, agency chiefs, operations managers/directors, assistant/deputy directors, etc.

Arranging a Meeting

There are several opportunities and venues by which you may choose to meet with your elected representatives. Which method you choose will likely depend on your overall goals of the meeting and how formal of a discussion you wish to have with the office. You can attend a "town hall" meeting as a constituent, schedule an in-person meeting in their home district office, attend public functions hosted by the representative, invite the policy maker to your group's meeting, or choose to meet them at their state or federal capitol office.

You can schedule a meeting with a legislator simply by calling or emailing their office and asking to speak with their scheduler. Let them know what you wish to discuss with their office and provide them with a couple of days that you are available to meet. They will likely assign you to a meeting with a staffer. Alternatively, you can email the staffer directly to request a meeting. **TWS headquarters staff has access to relevant contact**

information of U.S. federal legislative offices and is happy to assist units in determining an appropriate point of contact.

When scheduling a meeting with legislators, consider scheduling around events on the annual and congressional calendar. It may be best to meet:

- Between congressional sessions or during other recesses: Elected officials may be
 easier to meet within their home districts when Congress is not in session; their
 staff is also usually less busy during these times. Floor calendars for the <u>U.S.</u>
 Congress, Canadian Senate, and Canadian House of Commons are available online.
- When a bill has been introduced, prior to committee markup or hearing: It might be beneficial to meet and discuss a particular bill after that bill has been assigned to a committee, prior to the committee's markup or hearing on the bill.
- Start of a new legislative session: This is a good time to meet new members of the legislature and introduce yourself, your organization unit, and your unit's policy priorities. Legislative sessions vary between state legislatures: refer to your state legislature's website for the specific dates of their legislative session(s). U.S. federal legislative bodies begin a new Congress in January of odd-numbered years. Sessions of the Canadian Parliament typically last for one full calendar year with several periods of adjournment. A new legislature is elected in Parliament at least once every five years, although elections can occur more frequently.
- Start of the budgeting process: If your issue involves the budget, you may want to meet with the legislature after the Executive Office has released their proposed budget and prior to action by the legislature's appropriation committee(s). The U.S. federal budgeting process usually begins in February of each year with the release of the President's budget. Canada's annual federal budget cycle begins following a recess of Parliament in June of each year.

More information on when to become involved in federal policy processes in the U.S. and Canada is available in Section 5.

Preparing for the Meeting

You want to go into the meeting well prepared, with a well identified purpose, a solid understanding of your main points, and some insight into where the individual(s) you are meeting with stands on the subject.

Prepare for the meeting by briefly researching the decision maker's background. Try to get an understanding of their history with related issues; their political affiliations and what that might mean regarding potential support or opposition to your issue; any relevant committees that the decision maker may sit on; what their constituency is like; what the primary concerns are in their district; and how your issue may relate to their constituency. Legislative member webpages and social media accounts are good places to start.

Be sure to also look into the decision maker's staff. Odds are high, particularly with legislators, you will ultimately meet with the staff member in charge of subject matter related to your topic rather than the legislator. Even if you do meet directly with the legislator or agency director, you can count on their staff being a part of the meeting. You might be able to find some insightful background information on these people as well that will help you understand their perspectives. LinkedIn pages of the relevant staff are often good places to begin.

Use your first-hand wildlife experience and understanding of the issue as well as insights gained in your background research of the policymaker to develop a few key points you want to make on the topic. Be sure to make these very clear and fairly concise – these are the "take-home" messages you want the decision maker to remember. See Chapter 3.1 for additional information on crafting your message.

You may consider creating a packet of some educational and informational materials to leave with the decision maker's office on the subject, particularly if this is a new topic or an issue they are otherwise unfamiliar with prior to your meeting. Letters your TWS unit or partners have written on the subject, bulleted fact sheets, brief handouts of your main points, and related agency budget information all may be good things to include in the packet. Plus, having these materials can help prompt talking points during your discussion – you can point to figures and photos on these handouts that help explain the issue and make your points. Be sure to keep any sheets concise and to the point; lengthy handouts are likely to not get read and will not serve your purposes well.

Don't forget to plan your attire for the meeting. Looking professional helps add merit to your arguments and makes you look prepared and well thought through on the issues. Typically, you should plan to wear business formal clothing to the meetings; this might vary a bit depending on the subject and location of the meeting.

What to Expect at the Meeting

Timing: You should plan to arrive at the meeting 5-10 minutes early. If other partners or individuals from your unit are joining in on your meeting, you might consider arriving a little earlier in order to have time to review your talking points and, if attending as a group or with partners, your roles and responsibilities for the meeting.

Don't be surprised if your meeting begins a little late, particularly in a legislator's office. The staff in these offices are often very busy and have several (10 to 20+) meetings and other events per day. As such, their schedule may fall behind. Along those same lines, don't expect to have a long meeting. Staffers often need to keep a fairly tight schedule, which might make you feel rushed. Expect about 15-20 minutes of total time to discuss the issue and make your points, so be concise and clear. The request of the decision maker should be made clear at the beginning of the meeting.

Where you will meet: If going to a meeting in a legislative office, you can likely anticipate meeting in one of several small meeting rooms. Depending on the time of year and



legislative calendar, the office may become overbooked; in that case, don't be surprised to find your meeting taking place in the hallway or on the couch in the receptionist area.

In an agency meeting, you can anticipate meeting in a conference room or at a table in a private office.

Who you will meet: When meeting with a legislative office, your meeting will likely be placed on the schedule of a staffer in charge of that subject matter. In an agency, you might meet with mid-level or operational managers or other assistants. Don't let this disappoint or discourage you – these are very competent people who work on these issues every day and don't underestimate the power of a decision maker's staff to influence actions and bring attention to an issue.

Discussion content: Expect the discussion to be friendly and respectful, and do your best to keep it that way. You should plan to provide a solid background on the subject– don't overestimate what the decision maker or their staff may know about the specifics of the issue.

You can likely expect the office to avoid taking any real stance on the issue, particularly if this is a new subject to them. They will want a chance to become more informed and potentially hear from other parties on the topic.

Meeting Process

When you enter an office for a meeting, introduce yourself to the receptionist and let them know you are there for a scheduled meeting with person X. If you have a business card, plan to give it to them – they keep this in their records of the meeting and it allows the receptionist to remind the staff who they are meeting. If you are representing your unit and do not feel comfortable relaying the specifics of your job, simply providing TWS unit affiliation is acceptable.

At the start of the meeting, be sure to introduce yourself and let them know you are there representing your TWS Section or Chapter. Remind them what you wanted to discuss during this meeting. If you have a packet to give them, hand this to them at the start of the meeting. This allows them to follow along with your points and see some of the figures and photos that might be included in the information you provided.

If this is your first meeting with a given office, you might make the focus simply an introduction of who you are (a TWS organization unit), what your organization's mission is, and what sort of specific issues your TWS unit is concerned about. Make them aware that your organization exists and offer yourself up as a resource for issues related to wildlife; provide a few examples of issues with which you could assist, including any identified priorities of your unit or TWS headquarters. You can lead that introduction into arranging a future meeting regarding a specific topic you wish to discuss.

Keep small talk and tangential chit-chat to a minimum. Time during the meeting is valuable, and you don't want to waste it getting side-tracked on other bits of conversation. Keep your

discussion to the point, but also friendly. Use this meeting to build your relationship with the office, and keep communication respectful.

When the staffer asks you questions you don't know the answer to, do not provide an answer! Simply let them know you are uncertain of the answer and commit to getting back to them after you have confirmed the facts. This shows that you are dedicated to the proper facts of the situation and gives you an opportunity to connect with the office again regarding your issue – more connections and communication about an issue likely translates into more potential for action.

Provide specific solutions to an issue, where possible. Offer draft language to revise legislation, provide reasons for budget increases, outline ways the agency should change its policies to improve wildlife management

Delivery of your "Ask"

You meeting likely has an end goal – in addition to making your ask clear at the beginning of your meeting, you may want a commitment of support from the individual regarding a certain policy at the conclusion of the meeting. Near the end of your discussion, it might be appropriate for you to ask a question like, "Can I count on you to support this issue?" Politely press for a commitment, unless they are clearly against the issue.

Ending the Meeting

When the meeting is ending, shake hands and thank the individual for their time. Express your desire to have their (continued) support and how you look forward to connecting with in the future to further wildlife policy issues (if applicable). Leave them the materials you brought with you along with your contact information and be sure to collect their contact information. Offer yourself as a resource for them on issues related to wildlife conservation. Re-emphasize that you will be in touch with them regarding any unanswered questions they may have had.

Follow-Up

In the next day or two after your meeting, send an email directly to the person you met. In the email, thank them again for taking the time to meet with you to discuss issue X. Then remind them of your main points in the issue, and again make yourself available as a resource for them.

The follow-up email is also a good time to send them additional information on the subject and answer any questions you needed to do additional research on. You can attach files or send links that will provide them with more in-depth information on the topic. If your meeting was face to face, be sure your email includes soft copies of your resources provided.

Virtual Meetings with Decision Makers

Virtual meeting platforms have become increasingly commonplace since the first edition of this toolkit was published, and are used regularly to facilitate meetings with decision makers. Two common platforms for virtual meetings are Zoom and Microsoft Teams. Virtual meetings can be an excellent option if you're seeking an opportunity for a personal interaction with decision makers and/or their staff but are restricted in your ability to travel to visit their offices. In general, all of the guidance provided above still applies regarding preparing and delivering your message. However, there are some limitations and considerations unique to this type of meeting.

Attire and surroundings: You may be calling into a virtual meeting from your office or even your home. Regardless of your location, plan to dress in professional attire. Set aside time before the call to preview your background; most virtual meeting platforms offer a "blur background" feature that you can use if your background is too busy, or if you're in a common space where others may be walking in and out of view. Check your lighting and make sure you can be seen clearly and aren't in an area that's too dark or backlit. If you'll be calling from a shared workspace where your microphone may pick up noise from others, these platforms also offer an option to filter out background noise.

Practice to limit technical difficulties: If this will be your first time using a particular meeting platform, make sure it's installed on your computer and fully-functional well in advance of your meeting. Ask a friend or co-worker to join in on a practice call to make sure you're comfortable with the basic functionality of the meeting platform. Use the "test audio" and "test speakers" options within the platform to make sure that you'll be able to hear and be heard during the call. Be sure to check that your internet connectivity is sufficient to prevent any lag or poor audio/video quality during your meeting. If quality issues arise during the call, make the suggestion that participants turn off their video or use the dial-in option provided by the meeting platform for audio access.

Eliminate distractions: Make sure that you've muted all sources of notifications (e.g. email alerts, digital messaging platforms, texts or phone calls) that could distract from the message you're trying to convey.

Educational Materials: Any resources you would have otherwise delivered in person to the decision maker can be included in the follow-up email at the conclusion of the virtual meeting. If you are looking to use a resource as a prop in a congressional meeting, you can consider sharing your screen with the individual(s) to highlight that resource. In general though, meeting attendees should keep the messaging clear and concise, and utilize educational resources as a tool for following up with the offices.

3.3 WRITING A LETTER

Writing a letter is an efficient and effective way of delivering your message to influence legislators, agency administrators, or other decision makers. Letters can carry a lot of weight, particularly when from organizations and constituents within the legislator's district, or if they involve several diverse organizations.

Consider writing a letter:

- When the issue is not particularly urgent letters can take some time to write, approve, send, and read. Therefore, letters may not be the best approach for an urgent issue.
- When you want to educate the decision maker letters provide a written record that can be referred to frequently as a resource document on the issue, particularly when you include sound wildlife science in support of your issue.
- When you are presenting complex material letters allow your thoughts to be logically and clearly organized. They can also be re-read and referred to in order for the policymaker to learn about the issue and understand the topic more clearly.
- To thank a decision maker for supporting your issue decision makers need to know when they are doing something you like and who their friends are on certain issues. Writing a supporting letter encourages them to keep on track and reminds them that you are involved and watching what is going on with the issues.
- *As a follow-up to a visit* use the letter to thank them for their time in meeting with you and to re-emphasize your main points.

Outline of a Typical Letter

An effective letter will flow logically and concisely explain the issue and provide information that supports the action you believe the policy maker should take to address the issue. See Appendix C for an example of an effective letter.

First Paragraph should state the purpose of the letter. Clearly indicate the issue on which you are writing. If the issue relates to a specific piece of legislation, then include the specific bill number. Explain your concerns or position on the issue and what action you hope they will take.

Second Paragraph should introduce your organization. Explain that you are a Section or Chapter of The Wildlife Society and you represent wildlife professionals. State the mission of the organization, and as a result why you are interested in this issue. This paragraph shows the policymaker your credentials and helps bolster your opinion on the matter.

Next Paragraphs explain the scientific-based concerns you have regarding the proposed or ongoing legislation or agency actions. Keep these statements clear and concise and ensure they support your central idea – the action you want taken.

Closing Paragraph should restate your concerns, and draw a bigger picture of the effects of the action. Restate the action you hope they will take about the issue.

Sign-off of the letter can be done by your unit's President, the Executive Board, or your CAC Chair. Who you choose may depend on your unit's operations manual and/or the specific issue being addressed. Units may also choose to delegate the task of signing a document if the typical signatory has a professional conflict with the issues discussed in the letter.

Tips for Letter Writing

Include the official letterhead of your unit. This provides an official look and feel to your letter.

Short letters are ideal. Say what you need to say, but be as brief as possible; longer letters that are repetitive are less likely to get read or be impactful. If possible, keep the letter to one page of text.

Focus on one issue in the letter. If you have other issues you are concerned about, write another letter. Letters that involve more than one issue may become more convoluted and lose their impact.

Use a sincere and respectful tone. You can be stern, but don't be disrespectful.

Express your appreciation for their consideration. Policymakers are often very busy, and may get inundated with people trying to influence their decision in multiple ways. Express your thanks that they took the time to read through your letter.

Provide your contact information. Policymakers or their staff may be interested in obtaining more information from you regarding the issue; make it easy for them to do this by ensuring your contact information is included somewhere on the letter – either in the letterhead or in your signature.

Be as specific as you can be. Provide specifics on the changes you would like to see happen, whether that be specific language to include in a regulation or bill, or specific values to include in a program budget. This makes it easier for the decision maker to address your concerns.

Sign-on Letters

You may consider circulating your drafted letter around to other wildlife and natural resource conservation related organizations for them to sign-on. Allowing other organizations to sign-on to your letter helps bolster a broader network of support behind your issue. Letters that have multiple, well-known organizations supporting them carry a large amount of influence behind them.



You may also be asked to sign-on to another organization's letter. Consider doing so if the policy issue and advocated position are within the support of your unit. This activity helps build and reinforce valuable partnerships.

Letters to the Editor

This guidance was adapted from the National Wildlife Federation Action Fund's <u>Advocacy</u> Toolkit

A letter to the editor is less formal than letters sent to decision makers and allows your unit to voice an opinion on a current issue in a public forum. The news outlet you submit your Letter to the Editor to will typically provide their own requirements on formatting and content. Keep this type of letter brief (typically 200 words or less) and focus on key impacts to wildlife and/or wildlife professionals. You can include visual aids like charts or figures if they help support your opinion on an issue. If your letter is published, consider including a copy as a supplementary resource to any letters you send to decision makers to emphasize the importance of the issue with their constituents.

Sending Letters via Email or Mail

For letters to policymakers - you can choose to send your letter via email or regular mail, though email is most often preferred by offices. Both methods have their pros and cons; you may consider using multiple methods with the same letter to ensure the letter reaches its intended target effectively.

Regular mail

Pros: tangible, personal letter is delivered to the policymaker

Cons: slow process; letter may be delayed by security measures, less likely to end up with relevant staff member

Email

Pros: quick, effective delivery

Cons: impersonal; lost in heavy email traffic, challenges in determining appropriate point of contact

Submit Letters to TWS Staff

Letters submitted to policymakers on behalf of your unit should also be sent to TWS Government Affairs staff. This allows staff to be aware of and assist with policy activities, ensure consistency among TWS policy actions, and maintain a database of policy actions that can be used to inform and support the work of other units. Submit finalized letters and other policy actions to policy@wildlife.org. If your unit is looking for input on correspondence prior to sending, TWS staff are also happy to help with review of and alignment to TWS priorities.

3.4 ISSUING A PRESS RELEASE

Press releases provide an avenue for your unit and your partners to share information with the broader public by sending a concise readout on an issue to members of the media for reporting purposes.

Press releases can be sent far and wide to relevant partners and decision makers, but members of the press and media are the intended target of this information distribution tool. Media contacts targeted should be within your unit's geographic boundaries in order to have the biggest impact.

Before committing the time to a press release, be sure to consider the goal of drafting and distributing such a document. Press releases will only be successful if they are received by your target media outlets. If you do not have these contacts, check with partners to see if they have contacts to share or other resources to leverage. You may find it worthwhile to issue a joint press release with one or more partner organization. If media contacts are not known within your unit's geographic area, consider other mechanisms for getting information out to public, such as webinars or social media engagement.

Consider drafting a press release when:

- Your unit has a clearly stated position on an issue Support for legislation, legislative action, or regulatory action are common and straightforward uses of press releases. Press releases should not be used when trying to relay complex or nuanced positioning on an issue.
- You are showcasing a new resource Press releases can be used when you are trying to raise the profile of a new unit resource, such as new position statements or educational resources.
- Attempting to raise the profile of unit engagement Press releases can be used when a unit is trying to elevate a new partnership they founded or joined, or an event the unit participated in (such as engaging in a fly-in, providing testimony to a committee, or speaking at a public event).

Outline of a Typical Press Release

A press release should be drafted in plain language and include information at the top of the release on the date, location, relevant points of contact (phone and email), and the organization(s) publishing the release. The title of the release can be up to a sentence in length and should clearly state the organization's position. See Appendix E for an example of a TWS-issued press release.

First Paragraph should only be one to two sentences, and should echo and expand upon the title of the release.

Body Paragraphs typically provide background on the issue or initiative that you're highlighting.

Quotes should be included from each organization represented on the release, and are typically no more than 2 to 3 sentences long. Any quotes included should be attributed to someone in a leadership position in your unit or partner organizations, and should state the title for that individual (e.g. Chapter President).

If the press release is from one organization, include the quote somewhere in the body of the release. The quote should be able to stand on its own in relaying your organization's position, and should not include any acronyms or phrases that would confuse a reader if the quote were to be viewed in any press coverage as a result of the release. If multiple organizations have signed onto the release, it is acceptable to include multiple quotes at the conclusion of the release.

Mission Statements from all organizations and/or coalitions included on the press release should be included at the end of the press release. This can also include reference to your unit/organization's website where members of the media can go to find additional information.

Send a Copy of Press Releases to TWS Staff

Press releases issued by TWS organization units will be archived for reference in the TWS Policy Library. Staff is also available to assist with drafting and review of press releases. Send press release materials to Policy@wildlife.org.

3.5 PHONE CALLS WITH DECISION MAKERS

Phone calls are an excellent way to engage your unit's membership in policy activities. Phone calls provide individual members the ability to affect change without the added time or expense of setting up and attending a meeting. When calling legislators, staff members keep a log of all incoming calls to their office, and the volume of calls received on a particular issue is important. High call volumes related to an issue may result in a staffer devoting time to research that item in more detail and the legislator forming a position on the issue.

Tips for Successful Phone Calls

Focus your call efforts where they're likely to have the greatest impact. If you're calling a member of your U.S. federal congressional delegation, it is better to call their D.C. office as opposed to an office in their district. If they have a staffer specifically focused on environmental issues, they're most likely based in the D.C. office.

Research your decision maker. Before your call, make sure you have a good understanding of a legislator/decision maker's history with your focal issue. How have they voted on the issue (or similar issues) in the past? Are they a cosponsor of the legislation you're calling to discuss? This research will help you anticipate how your call is likely to be received, and how to address any questions that a staffer may ask you during the call.

Be polite and concise. Understand that it's unlikely you'll be speaking directly with your decision maker, or even their environmental staffer. It is likely the individual you speak to will be someone just getting their start in policy. Be kind and straightforward in your messaging, and most importantly, don't be intimidated. You are the expert in this scenario!

Personalize your message. Feel free to adapt resources or call scripts to fit your experience with an issue. State or jurisdiction-specific examples of the impacts of a policy are especially powerful. See Chapter 3.1 for additional ideas.

Follow up in writing. If interested, end your call with an offer to follow up with an email or letter addressing the issue that you discussed. You may be asked to provide additional information or responses to questions in writing by the individual you speak to during your call. Follow-up with the office is not required, and should not be viewed as a barrier to engagement in this grassroots tactic.

Phone Call Script

In this example, you are requesting a legislator's support for the Recovering America's Wildlife Act. Feel free to adapt this script to fit whatever issue you're engaging with currently.

Office staff: Senator X's office, how can I help you?

You: Good [morning/afternoon], my name is [Your Name], and I'm a constituent and a natural resources professional calling to request Senator X's sign on as a cosponsor to the Recovering America's Wildlife Act, also known as S. 2372. Can I count on the senator's support? Office staff: Thank you for calling. Can I get your name again and your address?

You: Yes. My name is . . . and my address is . . . Office Staff: I will let the senator know you called.

You: Thank you for your time.

It is possible that the staffer will allow you time to provide additional information on the legislation and/or why it matters to you that the legislator show support for/cosponsor the bill, in which case consider adding some state-specific examples as mentioned above. Otherwise it is most important that you make your constituency and your request to the decision maker known, including with information on the title and number of the legislation if applicable.

3.6 COMMENTING ON U.S. FEDERAL AND STATE AGENCY RULEMAKING

Wildlife professionals have the opportunity to ensure that the best possible science and their firsthand experiences are accounted for in rules affecting wildlife by participating in the commenting process associated with rulemaking at the state and federal levels.

Just as your engagement with the legislative process should be governed by the scope of your CAC's policy priorities, engagement with rulemaking can be tailored to the interests and expertise of your CAC and unit membership. The scope and detail of your comments should also align with the different phases of rulemaking, which are outlined below. These phases are largely similar at the state and federal level, although the title and timing associated with each phase may differ between agencies and levels of government.

Phases of Rulemaking

Proposed Rulemaking

Opportunities to provide comments on proposed rulemaking are advertised to the public via Advanced Notice of Proposed Rulemaking (ANPR). Typically at this stage in the rulemaking process draft rule language is not available for review. The focus of this phase is *information gathering to inform eventual rule language*.

The information being sought during proposed rulemaking is often broad and may be conceptual in nature. Commenting during this phase presents a unique opportunity to provide early input in the structure and function of eventual rule language. Your comments during this phase should focus on:

- Sources of data that agencies should incorporate into future rulemaking efforts
- Key stakeholder groups who should be consulted during rulemaking and eventual implementation of the resulting rule(s)
- Suggested impacts of rulemaking based on available research and professional expertise
- Any specific questions posed by the regulatory body in the notice provided

The Public Scoping Process

Public scoping is a process similar to ANPRs, and provides federal regulators the opportunity to hear from stakeholders and the public on issues to be explored as the government seeks to develop an Environmental Impact Statement (EIS) or Environmental Assessment (EA) on a proposed federal action under the National Environmental Policy Act (NEPA). In addition to providing an opportunity to submit written comments, public scoping meetings are often offered as part of the scoping process. Expertise on wildlife habitats and populations that fall within project-specific boundaries is especially valuable during the public scoping process; the comments your or your CAC provide will help

determine the scope of resulting EISs or EAs, any additional environmental review requirements for the project, and the process by which the EIS or EA will be prepared.

Proposed Rule

At this stage in the rulemaking process, draft rule language is made available for review and comment as advertised via Notice of Proposed Rulemaking (NPRM; at the state level sometimes classified as Notice of Proposed Rule/NPR). Wildlife professionals are well-positioned to provide data and expertise relating to the impacts of the rule language that is provided for comment. Your input here is valuable and may result in changes to language in the final rule.

Final Rule

The end of the rulemaking process is advertised via Notice of Final Rulemaking. Although this phase is not typically accompanied by an opportunity to provide comments, it is important to note that rulemaking agencies include a date of rule implementation during this stage. Agencies may also include information on future rulemaking efforts of interest as part of their Notice of Final Rulemaking.

Recommendations for Successful Comments

Clearly introduce your organization and purpose for providing comments. Include a brief introduction in your comments highlighting the expertise of your CAC and broader unit membership as it relates to the rule you're providing comments on. Relevant expertise may include working experience in the geographic area impacted by rules, species-specific expertise, knowledge of permitting systems and/or processes, etc. It is also important that you include a reference to the specific notice that your comments are being submitted in response to.

Be as specific as possible. Vague comments are largely impossible for agencies to act on. For example, if you are commenting to provide suggestions on data sources to include in rulemaking, instead of

"The agency requires more data to inform future rulemaking activities"

A more effective alternative would be

"An analysis of databases X, Y, and Z should be conducted to establish baseline information on wildlife populations so that impacts to these populations by the proposed rule can be measured during and following implementation"

You should specifically reference the language from the notice that you are commenting in response to. If the regulatory body proposing the rulemaking provides specific questions for the public to consider, use these questions as a guide when drafting an outline. This ensures that regulators can easily pinpoint the section of concern.

Avoid opinion statements. Your comments and recommendations should be supported by a combination of data and the professional expertise of your CAC and unit members. TWS



maintains <u>reference lists</u> of published science relating to the organization's policy priorities which are available to support your engagement with the rulemaking process.

Comments in support of rulemaking are just as valuable as those in opposition. Take the time to voice your support for rulemaking that successfully incorporates the best available wildlife science, or that will result in positive impacts to wildlife and wildlife professionals. Be sure to include justification for your support based on available data and professional expertise; agencies rely on these types of comments to help justify their rulemaking decisions to stakeholders who may be in opposition to the implementation of these rules.

Save the date(s). Rulemaking notices will specify a date by which all comments must be submitted.

Engaging Members in the Commenting Process

Preparing and submitting comments on agency rulemaking can be a daunting activity for any one individual, or even the members of a CAC to tackle. Consider soliciting feedback from your broader unit membership if you feel that you or your CAC are missing the expertise needed to best support your comments. Suggestions for soliciting feedback include:

- Communicate upcoming opportunities to provide feedback on your Section/Chapter listserv, newsletter, or social media channels. Be aware that broad requests for feedback (e.g. "We're interested in member thoughts on this rulemaking item") may be too vague resulting in limited member engagement. Consider providing prompts to accompany this type of outreach, or creating a one-page document that includes background information and resources to help support engagement.
- *Host a webinar or meeting to generate discussion on the rulemaking item.* Some members may be more interested in engaging if they have an opportunity to ask questions and provide informal feedback verbally as opposed to writing out formal comments. Similar to the suggestions above, you may wish to develop guiding prompts prior to the meeting/webinar to help members target their feedback to specific elements of the rule or proposed rulemaking.
- Create a survey to quantify member support or opposition for a rule and collect additional feedback. Your poll or survey may be broad (e.g. are there any comments you wish to provide on the proposed regulations included in the NPRM) or targeted (e.g. what changes should be made to the current definitions for the phrases "Geographic Area occupied by a Species" and "Physical or Biological Features" that would better support science-based wildlife conservation?). Google Forms and Survey Monkey are two commonly-used platforms for creating these types of surveys.

- Work with your Section/Chapter Executive Board to identify unit members with known expertise relating to the rule or proposed rulemaking. Some members may have professional expertise that relates directly to the rule that you're preparing comments on, but be unfamiliar with the commenting process or hesitant to engage. Reach out to them directly and see if they would be willing to review comments prior to submission and flag any relevant information you may have missed; this is a great entry point for future policy engagement.
- Reach out to TWS Working Groups for additional support and topical expertise. TWS Working Groups allow members to exchange information and promote science-based decision making on specific areas of interest within the field of wildlife management. Whether you lack expertise on a given topic within your unit's membership, or you're looking for additional support to improve the effectiveness of your rulemaking engagement, Working Groups have many resources to offer. TWS staff is available to coordinate engagement between units and working groups.