

June 17, 2015

Dear Director Hough,

Thank you for the opportunity to comment on the Pennsylvania Game Commission's Strategic Plan for 2015-2020. The Pennsylvania Chapter of The Wildlife Society (PATWS) is the state chapter of The Wildlife Society, and our mission is to represent and serve the community of wildlife professionals in the Commonwealth of Pennsylvania, to develop and promote the sound stewardship of wildlife resources and of their habitats and to increase awareness and appreciation of wildlife values. We encourage science-based management and habitat enhancement for wildlife. We also promote professional development opportunities for individuals in the profession. These principles guide our comments and review of this document. Please consider these recommendations as you continue to finalize this Plan.

PGC's Strategic Plan for 2015-2020 presents a new outlook for the Commission. We note new ideas and approaches that the PGC plans to adopt to address new challenges and opportunities. We applaud PGC's core goals to put wildlife first, to serve all audiences in the Commonwealth, to follow sound business practices and to continue to support hunting and trapping. The goals and values you present serve as a strong foundation for the implementation of this plan. Below, we comment on individual sections of the report.

## **Introduction**

- The introduction provides useful background information and highlights PGC's history and accomplishments as well as Pennsylvania's hunting heritage. This section could be strengthened by highlighting the PGC wildlife diversity program in a parallel manner. This would help to better articulate your mission and help to provide support for PGC's goal to manage for all species and expand beyond your constituency to include all Pennsylvanians that use wildlife whether consumptively or not.
- The introduction states the economic impact of hunting in Pennsylvania as almost \$2 billion. We recommend that you expand this section and include the economic impact of wildlife watching which is estimated at an additional \$1.1 billion.<sup>2</sup> This is an opportunity to demonstrate your relevancy to a broad and diverse group of stakeholders.
- *North American Model of Wildlife Conservation* - Many of the objectives you describe reflect application of the North American Model of Wildlife Conservation and, rightfully so, you include this model in the introduction section. We ask that you review the model to ensure that the tenants are correct - specifically tenants 2, 3 and 5.<sup>1</sup> We have included a

1 Organ, John et al. "Born in the Hands of Hunters." *Wildlife Professional* Sept. 2010: 22-27.

2 U.S. Department of the Interior, U.S. Fish and Wildlife Service, and U.S. Department of Commerce, U.S. Census Bureau. 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.

draft of the original Model, printed by TWS in *The Wildlife Professional* (Organ et al; 2010) for your reference. This will help to perpetuate the model in an accurate manner.

- We encourage you to cite any sources of information throughout the strategic plan. This will help to demonstrate your point and provide support for your strategic goals.

## Challenges

- *Whom do we serve?* – Managing for an expanding clientele may be a challenge, but it also provides an opportunity to increase support for the agency. Recognizing this need and expanding the diversity of individuals served will be critical in future years.
- *Public Relations and Marketing* – In today's day and age relevancy of a public agency depends on how well the agency communicates with its audiences. Public relations and marketing should not be viewed as nebulous tasks but as an opportunity to articulate your mission, to relate to target audiences and to increase support. We suggest that the functions of PR, Marketing and Communications are so intertwined that these be combined under one heading.
- *Unsustainable Cost of Labor/Benefits* – We recognize that controlling the ever-increasing costs of a work force is a challenge for many agencies and organizations. However, we think it is also important to discuss plans to improve the efficiency and effectiveness of your current workforce and detail the strategies you will use to enhance professional development and retention of your current employees. There is an opportunity to address how new revenue from an increase license fee might be used to this end.

**Strategic Goals and Objectives** – We address specific objectives below

### 1. Put Wildlife First – We are in strong agreement with this core goal

- *1.1.2 Release of Northern bobwhite* – We suggest that the goal of releasing bobwhites is premature and should be revised to be a goal of assessing the feasibility of conducting a reintroduction of Northern bobwhite. The probability of achieving success will be greatly enhanced by knowing appropriate genetic stock for Pennsylvania winters, best locations for long term survival and dispersal, etc. Put the science first.
- *1.1.5 Develop strategies to support the Pennsylvania Action plan by 2016* – This objective is good but is too broad to be able to evaluate success or failure. We suggest focusing this objective to something like: implement and support the conservation, management and research recommendations detailed in the Pennsylvania Wildlife Action Plan (21015) by 2016.
- *1.2.1* – We noted that this was the only strategy that offered for revisions if necessary due to budget constraints. We encourage the Commission to make management decisions based on the scientific evaluation of all strategies including wildlife management projects, land acquisitions, hunter recruitment, retention and reactivation initiatives, etc.

### 2. Improve Wildlife Habitat – We are in strong support of managing wildlife habitats

- *2.1 Transition management practices on State Game Lands towards large-scale*

(increase average acreage by 50% over current increases), high-quality, early successional habitats – We suggest you include the management of pipelines and transmission lines as habitats to actively manage for early successional habitat.

- We suggest you add an additional objective to include identifying and managing core forest habitat. This is one of Pennsylvania’s most important wildlife habitats with great regional significance. We suggest *2.1.1 Identify quality core forest habitat on Game Lands and manage these areas to retain forest cover and minimize fragmentation.*
- *2.2 Early successional habitat on private land* – Add pipelines as habitats to enhance for successional wildlife.
- *2.4* – We encourage securing tracks of land in more urban settings as well to increase access opportunities for all users.
- *2.6 Use the best available science to determine strategies for enhancing wildlife habitat for Wildlife Action Plan species*--Should be added to.
- *2.7* – We recommend facilitating the development of grasslands habitats (in reclaimed strip-mines and other open landscapes) through planting native warm season grasses and cool season grasses combined with pollinator forbs rather than having WSG embedded in the young forest habitat strategy. The added strategy should focus on a minimal maintenance approach using rotational mowing and prescribed fire where appropriate to maintain a grasslands complex, control invasive plant species and set-back succession.

### **3. Follow Sound Business Practices** – We are in strong agreement with this core goal

- *3.4 Send Board of Commissioners to the wildlife management training course* – We are unfamiliar with this course. Is it one that is currently available or will be developed in the future? Our chapter would be willing to assist in identifying a course if necessary.
- *3.8* – We encourage the Commission to invest in sound marketing strategies that promote the experience of hunting, wildlife watching and the shooting sports rather than focusing solely on product development.

### **4. Serve the Pennsylvania Public** – We are in strong agreement with this core goal

- *4.2* – We feel that this is an important role for the Commission to carry out and we encourage the agency to approach it sooner than 2020.

### **5. Improve Support for Hunting/Trapping** – We are in strong agreement with this core goal

- *5.4* – We would like to understand why the harvest rate should be increased. What methods is the agency proposing to increase the harvest rate?
- *5.8* – We encourage the agency to expand their understanding of hunter recruitment, retention and reactivation initiatives and evaluate all agency methods in relation to their impact on user participation rates. We believe this will be a helpful strategy to meet the no-net-loss goal set forth by the agency.

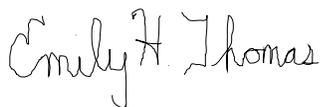
## **Services**

The primary Goal for this plan is to *Put Wildlife First*. We would recommend that you put the section on *Wildlife Services* at the beginning of this section to reflect your goals. This section could be separated in to the services you provide in regards to both game and non-game species to further reflect your dedication to serve the Pennsylvania public too.

**Thank you**

This plan establishes the next five years of wildlife management in the Commonwealth. We have spent considerable time discussing and reviewing this document because we see value in the efforts of your agency. We view the Pennsylvania Game Commission as our partners in the management of Pennsylvania's wildlife resources and their habitats and we appreciate the opportunity to comment on this plan. If you have any questions or concerns regarding this letter, we encourage you to contact Emily Thomas, President of the Pennsylvania Chapter of The Wildlife Society.

Sincerely,

A handwritten signature in cursive script that reads "Emily H. Thomas".

Emily H. Thomas

President

Pennsylvania Chapter of The Wildlife Society