



49651 Shenandoah Circle, Canton, MI 48187
www.attorneysforanimals.org

Public Comment

Natural Resources Commission Meeting
Thursday, January 9, 2020, 12:30PM
MSU Veterinary Diagnostic Laboratory
4125 Beaumont Road, Lansing

Chair Schlaybaugh and members of the Natural Resources Commission:

Thank you for the opportunity to address the Commission on its first meeting of the new decade. Attorneys for Animals, Inc. (AFA) is a Michigan non-profit and 501(c)(3) organization of legal professionals and animal advocates. We work within the legal system and encourage efforts to ensure that animals are recognized, treated and protected as individuals.

AFA closely monitors legislation and takes positions and testifies on bills related to our mission. We frequently testify before the Senate Natural Resources and House Natural Resources and Outdoor Recreation committees. We share with the Commission and the DNR a strong interest in the laws and policies affecting wildlife, although we may not always agree on what those laws and policies should be.

I am here today to discuss two concerns and to provide one suggestion.

First is the lack of representation of wildlife advocates and non-consumptive users of our parks, wildlife areas and the other natural resources which abound in our state. We *once again* encourage the NRC to reach out to these other constituents. I say “once again” because in preparation for today’s meeting, I reviewed AFA’s letter dated January 22, 2016 in response to the DNR’s request for public comments on its Wildlife Guiding Principles and Strategies (“GPS”) as it was developing the Wildlife Division Strategic Plan 2016-2020ⁱ. One strategy (incorporated into the final GPSⁱⁱ) was to “[u]se advisory committees to help develop recommendations for regulating wildlife”. We requested “that the DNR incorporate representatives from the animal interest community into these committees. Incorporating representatives of the animal interest community into these committees will help achieve the DNR’s own goal of assessing the ‘desires of stakeholder groups,’ as stated in Strategy 1.2.4.”ⁱⁱⁱ We offered in 2016 – and continue to offer – our assistance and input.

There was no response to the letter. We do not know if advisory committees have been formed. Nor do we know the status of the next GPS, the current one expiring this year. We challenge this Commission to ensure compliance with one of the 13 strategic issues, “External Communication” which is stated as follows: “The Wildlife Division continues to have diverse stakeholders and partners and communicating about the priorities and management decisions can be difficult. Our staff now focus on enhancing trust

and credibility through effective communications. Stakeholders and partners desire and appreciate opportunities to engage the Wildlife Division.”^{iv}

Second is the continuing emphasis on consumptive users resulting in missed opportunities to encourage other recreational activities. There is no dispute that hunting is declining.^v There can be little dispute that wildlife watching, photography, hiking and other non-consumptive outdoor activities generate significant expenditures, and indeed, more than hunters and fishers combined.^{vi} We are concerned and question the commission’s and agency’s emphasis on encouraging hunting at the expense of developing resources and programs for non-consumptive users and activities. We urge and challenge the commission to broaden its focus.

Which brings us to the suggestion.

A suggestion for an action that can be taken that begins to address these concerns, albeit in a small way: We propose that the DNR establish lotteries patterned after the Pure Michigan Hunt^{vii}, for other outdoor activities such as bird-watching, hiking and wildlife photography. The Office of Outdoor Recreation Industry^{viii} created last year by the governor is a natural partner, as the Outdoor Recreation Advisory Council^{ix} which makes recommendations to the Office includes many members representing industries and businesses providing running gear, sporting goods, outdoor apparel, bicycles, ORV/snowmobiles and skiing.

We reach out to foster a collaborative relationship with this Commission and believe that AFA, and other wildlife advocates are an underutilized resource who have much to contribute.

Very truly yours,



Beatrice M. Friedlander, JD
Board President

ⁱ https://www.michigan.gov/documents/dnr/Wildlife_GPS_Strategic_Plan_434049_7.pdf

ⁱⁱ Supra at page 18 of 32, GPS Strategy 1.4.4

ⁱⁱⁱ Also incorporated into the final plan, supra at page 17 of 32

^{iv} Supra at page 12 of 32

^v See for example a recent article <https://fox17online.com/2019/11/15/dnr-addresses-decline-in-hunting-new-regulations-for-start-of-firearm-deer-season/> acknowledging a decline of almost 50% in the number of licensed hunters since the 1990s

^{vi} <https://www.census.gov/library/publications/2018/demo/fhw-16-nat.html> most recent National Survey of Fishing, Hunting, & Wildlife-Associated Recreation (FHWAR) published in October 2018 by the U.S. Fish and Wildlife Service

^{vii} https://www.michigan.gov/dnr/0,4570,7-350-79119_79147_82001---,00.html

^{viii} <https://www.michigan.gov/whitmer/0,9309,7-387-90499-497782--,00.html>

^{ix} https://www.michigan.gov/dnr/0,4570,7-350-79137_79763_86754_86755-475157--,00.html