



The Wildlife Society
The Kansas Chapter

Promoting Excellence in Wildlife Stewardship through Science and Education

08 January, 2026

Kansas Wildlife and Parks Commissioner Whitney Damron
Topeka, KS

Chairman Damron,

On behalf of the Kansas Chapter of The Wildlife Society, an organization whose members are respected land managers, biologists, administrators, researchers, and educators in Kansas, we write to convey our opposition to the proposed regulation 115-45-1 to allow the Kansas Wildlife and Parks Commission (Commission) to draft rules and regulations. The draft regulation would be a significant change to the role of the Commission in regulating wildlife policy in Kansas, oppose the North American Model of Wildlife Management, open the door to future abuse of wildlife policy in Kansas, and disrupt a long and successful collaboration between Kansas Department of Wildlife and Parks (KDWP) and the Commission. Furthermore, the draft regulation provides no oversight of the Commission's development of wildlife policy, would expose the regulatory process to political influence, and could be used to subvert KDWP's regulatory authority granted by the Kansas Legislature.

A key component of the North American Model of Wildlife Management is that science forms the basis for wildlife policy. To that end, KDWP employs trained wildlife and fisheries professionals who conduct population and harvest surveys of our fish and wildlife resources, public opinion surveys to gauge the pulse of affected stakeholders, collect data on fish and wildlife populations through a variety of appropriate means, and then model or interpret all of these data to form recommendations to be presented to the commission. KDWP professionals hold credentials demonstrating their expertise in wildlife science, and the agency allocates substantial financial resources to support these efforts. This rigorous, science-based approach ensures that management decisions are based on facts, rather than opinion, whims, or desires of individuals or special interest groups. It is unlikely that the Commission will have the resources and expertise to conduct rigorous science to inform regulations that they could create and require KDWP to adopt and enforce in the absence of a budget. The Kansas Chapter of The Wildlife Society trusts the science-informed recommendations put forth by KDWP, and would question the validity and scientific rigor of policy or regulations that bypasses or subverts KDWP's deep pool of experts.

The Kansas legislature created KDWP (K.S.A 32-801), granted them specific policy making authority (K.S.A. 32-807), and created the Commission to provide oversight to KDWP (K.S.A. 32-805(d)) to ensure that fish and wildlife regulations are not unpalatable to the average Kansan. Through this role, the Commission provides a very important check on the power of KDWP to manage our public trust resources for the benefit of the majority of Kansas stakeholders, while preserving the right to hunt, fish, and trap. The current draft of K.A.R. 115-45-1 provides for no oversight of the Commission's development of wildlife policy, and no veto power to KDWP to oppose unscientific or otherwise bad policy. If this regulation is approved, there will be no checks and balances in the regulatory process granted to the Commission except complex legislative oversight.

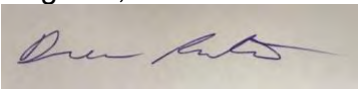
This regulation opens the door to future abuse of wildlife policy in Kansas. By allowing the Commission to "direct" the Secretary to draft regulations and move them forward for a vote, this regulation significantly increases the policy making authority of the Commission and cedes the authorities granted to KDWP by the legislature to a politically appointed oversight committee. By eliminating checks and balances from the regulatory process, just 4 political appointees could set fish and wildlife management policy with disregard

to KDWP opposition and the values of the North American Model of Wildlife Management. The regulation does not address the long-term ramifications of political influence on fish and wildlife policy, and paves the way for future abuse of the regulatory process.

Finally, the Commission and KDWP have traditionally worked as allies to collaboratively create fish and wildlife policy. When the commission has made recommendations that were supported after going through KDWP's established vetting process, KDWP has supported the recommendations, and they have become regulation. The current process does not appear to be broken, and there is no apparent need for this regulation – except to establish policy that may not be supported by KDWP.

We hope that you understand our concerns and appreciate the impact that this regulation could have on future wildlife policy in Kansas. Please help to ensure that wildlife policy remains science-based and free from political or other influences so that fish and wildlife populations are managed to provide opportunity for generations of Kansans to come. If you have any questions about our concerns, I am happy to meet with to discuss them in more detail.

Regards,

A handwritten signature in blue ink, appearing to read "Drew Ricketts", on a light-colored rectangular background.

Drew Ricketts, President
The Kansas Chapter of the Wildlife Society