

Public Comment

6/21/22

Every month, the agency sends out an e-mail to its listserv letting the public know what is going to be on the agenda for its upcoming regular meeting. This e-mail also invites people to submit written comment by 5:00 PM on the Tuesday before the meeting. Typically, this e-mail goes out on a Monday morning and people have at least 24 hours to submit written comment.

This month, the agency did not send out this e-mail until 7:30 AM on Tuesday morning, with the deadline for submission of written comment being less than 10 hours after this. Obviously, most people work from roughly 9:00 AM to 5:00 PM so this tight turnaround means they have no time to draft and submit public comment.

This same thing happened back in February. I reached out to staff and they said that it was due to a holiday that occurred on the Monday before the Commission meeting. In response to this, I reached out to the agency's leadership team and pointed out that the fact that the holiday fell on a Monday was foreseeable and asked that the agency consider sending out the notice e-mail for the meeting at least 24 hours in advance of the deadline for submission of public comment so this thing doesn't happen again.

Unfortunately, I never received any kind of response to my e-mail and the practice has not been changed.

Would it be possible for the agency to send out its agenda/notice e-mail at least 24 hours in advance of its deadline for the submission of written comment? A great solution to this problem would be sending the agenda/notice e-mail out on the Friday before the regular meeting as opposed to waiting until Monday/Tuesday. That would substantially increase the amount of time that members of the public have to draft/submit written comment.

-Conner

Letter in Support of Stakeholder Advisory Committee

May 23, 2022

Chair Jarrett
Vice-Chair Isserlis
Commissioner Downing
Commissioner Hayward
Commissioner Cooney

Dear Commissioners,

As members of various civic and professional groups with interests implicated by the work of the Public Disclosure Commission, we, the undersigned, urge the creation of a stakeholder advisory committee.

Today, on the threshold of the agency's 50th anniversary, the importance of the PDC and its mission of shining a light on the workings of state and local politics remains as clear as ever.

However, the PDC does not accomplish this mission on its own. To carry out its mission, the agency works together with a diversely situated group of tens of thousands of individuals and organizations across the state that file reports with the agency, comply with its regulations, or interact with the agency in various other ways to promote transparency. These individuals and organizations are the agency's stakeholders. It is the valuable partnership between these stakeholders and the PDC that makes it possible for the agency to fulfill its mission.

The current means by which agency stakeholders engage with the Commission on policy matters does not adequately reflect the value or collaborative nature of this important partnership.

Presently, the primary vehicle for stakeholder interactions with the Commission on policy matters is written and oral testimony. While this can be an important way for the Commission to hear from agency stakeholders, this method of interaction is seriously lacking in many respects. It is lacking because it does not allow for the two-way conversations with the Commission that are necessary to fully understand the party's positions and concerns. It is lacking because it does not allow for the longer conversations that need to occur on more complex and nuanced regulatory issues. It is lacking because the significance of testimony offered by one stakeholder cannot be fully understood by the Commission without hearing the testimony of other stakeholders who are also implicated by the matter being testified to.

To address these deficiencies, we propose that the Commission create a stakeholder advisory workgroup with the dual mandate of both a) identifying ways to promote transparency, and b) identifying requirements that may impose unnecessary difficulties or erect excessive barriers for those who participate or wish to participate in campaigns and in matters of state and local government. The group should be comprised of representatives from each of the agency's stakeholder groups as well as representatives from the Commission and Commission staff.

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In addition to addressing the deficiencies with the current stakeholder interaction process outlined above, this group could help the PDC draft and promote agency request legislation with a broader consensus, making it more likely to pass the Legislature.

We believe that the creation of such a group would benefit not only the agency's stakeholders, but the agency and the public at-large.

For the above reasons, we urge this Commission to create a stakeholder advisory committee.

Thank you for your service to the people of the State of Washington.

Signed,

Conner Edwards
Campaign Treasurer

Cindy Madigan
League of Women Voters
Money in Politics Issue Chair

Toby Nixon
President Emeritus,
Washington Coalition for Open Government
Treasurer for multiple campaigns and committees

Chad Minnick
Campaign Consultant
President, Minnick Group
Co-Chair, Pacific NW Chapter of the American
Association of Political Consultants

Dean Nielsen
Campaign Consultant
CEO, CN4 Partners
Co-Chair, Pacific NW Chapter of the American
Association of Political Consultants

Anthony Hemstad
Current Lobbyist
Former Local Elected Official
Former City Manager

Mario Lotmore
Publisher and Owner
Lynnwood Times

Jason Bennett
Campaign Treasurer

Abbot Taylor
Campaign Treasurer

Janet Miller
Campaign Treasurer

Jason Michaud
Campaign Treasurer

Tom Perry
Campaign Treasurer

Sharon Hanek
Campaign Treasurer

Phillip Lloyd
Campaign Treasurer

Josie Olsen
Campaign Treasurer

Eli Oldfield
Campaign Treasurer

Jay Petterson
Campaign Treasurer

Dawn Appelberg
Campaign Treasurer

Sarah Watkins
Former Campaign Treasurer