

**STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE
WILDLIFE PROGRAM**

**FISH AND WILDLIFE COMMISSION MEETING
April 13-14, 2012**

CONCISE EXPLANATORY STATEMENT

WAC 232-12-047 Unlawful methods for hunting.

A. Agency reason for adoption: Rule-making was initiated at the request of the hunters who would be governed by those rules.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Under section (4)(a), we are reversing our draw weight recommendation back to 125 pounds. This change is in response to input from hunters who may have difficulty drawing greater weights and the lethality of 125 pounds.
- Under section (4)(b), we are reversing our bolt weight recommendation back to 350 grains. The reduction in bolt weight is consistent with the 125 draw weight.
- Under Section 5, change the sentence to read: “Hunters with disabilities may also use a crossbow during archery seasons with a special use permit as conditioned in WAC 232-12-054.” This change was made to clarify the intent of this section.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
Thank you for putting the changes to regulations online for public review. My concern is related to optical sights on muzzleloaders. I can no longer see well and have difficulty with “iron sights.” I would like to see a regulation that allows older hunters to use scopes on muzzleloaders, as it would not significantly change the primitive nature of this muzzleloader hunting.	Thank you for your comments about the ease of providing your thoughts. We also appreciate your concern about aging hunters and vision issues and the ability to use open sights on muzzleloaders. While most equipment issues did not fit the rationale for the Governor’s moratorium on rule making, aging hunter demographics is a longer term issue that we must address. The department will need to consider greater flexibility on these issues in the near future.
You should allow exposed primers for muzzleloaders as well as scopes. Over 40 states allow it and it would help with license sales and participation. It would also reduce crippling of game.	The intent of the muzzleloader season is to provide some opportunity for using “primitive” equipment for hunting. The timing of seasons and other restrictions are based on the Department’s estimate of what harvest level would result. If the equipment becomes too effective, other restrictions would be needed. However, exposed primers and scopes may be used during the modern firearm seasons.
The 223 caliber is an effective deer load and many other states allow its use. Would you consider allowing its use?	This has been debated many times over the past several years and most have suggested that we limit the caliber to .240 or larger for deer.
I would like to see you allow red dot sights for muzzleloaders. As I have aged, it has gotten harder to use traditional sights. The red dot sight is not magnifying.	We appreciate your concern about aging hunters and vision issues and the ability to use open sights on muzzleloaders. While most equipment issues did not fit the rationale for the Governor’s moratorium on rule making, aging hunter demographics is a longer term issue that we must address.
We do not support the use of crossbows during the modern firearm season at all.	Thank you for your comment; we are trying to provide some additional options for hunting in firearm restricted areas.

Baiting of deer and photographing them should be illegal because it is not ethical.	Because of the Governor’s suspension of non-essential rule making, this issue was not considered significant enough to warrant debate. It can be addressed in future discussions.
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WAC 232-12-054 Archery requirements – Archery special use permits.

A. Agency reason for adoption: Rule-making was initiated at the request of the hunters who would be governed by those rules.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Under 1b, strike the last four words: “except for illuminated nocks.” After considering the information presented and the public input received, the Fish and Wildlife Commission voted against this proposed amendment.
- The language under 2a was changed to read as follows:

(2)(a) It is unlawful for any person to hunt big game animals with a bow that does not produce a minimum of 40 pounds of pull measured at twenty-eight inches or ~~((less))~~ at full draw ~~((length))~~.

The reason for the change is to clarify that 40 pounds of pull is required at whatever length full draw occurs for a hunter.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
I would like to voice my support in favor of allowing illuminated nocks for archery in the coming hunting seasons. I see this as a tool to aid in the recovery of game animals; I do not believe illuminated nocks would increase the instance of illegal hunting after dark. I believe there are too many other obstacles with archery to allow for using a bow in the dark (seeing through sights, peep sight, etc). Further, an illuminated nock only aids in seeing the arrow's trajectory and where the arrow came to rest. Since both of these benefits (seeing the trajectory and arrow location) happen after the shot, they would not logically be an instigating factor for a poacher to decide to take the shot in the first place.	Thank you for your support of the recommendation.
I am opposed to the approval of lighted nocks. The temptation to extend one's hunting day is strong, but even a lighted nock can be obscured by passing into or through the animals' body. Tracers are not allowed for a variety of reasons, checking your trajectory with lighted nocks is similar to a couple of them. Furthermore, adding electronics to "primitive" methods is a "slippery slope" which undermines the rationale behind these less lethal hunting methods.	These concerns are some of the main reasons that the archery community has not supported the use of any electronics in the past. However, the vast majority of archers surveyed by the Department were in support of this exception.
I see that you are considering illuminocks. That's great. I think you should allow the new range finder (leapold) that mounts on the bow. It would take the guessing out of the distance and create more humane kills, and less wounded game that does not get recovered. I realize that hand held rangefinders are allowed, but there is not always time to use them on any given encounter. Please consider allowing this ethical advantage. Also, there is no good reason at all why we cannot mount the little "hi-tech" video cameras onto our bows. They are great for memories, and can be used as a tool (you can look back at your shot and determine how long to wait to retrieve your animal, without needlessly pushing it all over the country).	The proposal being considered at this time is strictly related to illuminated nocks. No other electronic devices may be attached to the bow. The fact that other electronic devices would be requested if we allowed illuminated nocks is what folks have referred to as a “slippery slope.” Please see the comment expressed above.

COMMENTS	AGENCY RESPONSE
<p>An electronic nock is not necessary to bowhunt, nor have they proved to be helpful in the retrieval of lost game. It will encourage risky, and at worst illegal shots. Bowhunting is a close-range sport, and from up close with adequate light the things that are legal now to enhance arrow visibility work just fine.</p> <p>All that an electric nock will do, besides looking cool on video, is allow those who take long shots to find their arrow. If a person isn't willing to lose an occasional arrow then they aren't cut out to be a bowhunter. Locating downed game is one of the most important things we as conscientious individuals can do while in the field bowhunting. But arguably equal in importance is taking reasonable shots, those in good light and from short distances. I believe, although we will never know, that any device which may encourage some individuals to change their intelligent self-imposed shot limitations will lead to bad hits that wouldn't have occurred had there been no electric nock on their arrow. It only stands to reason that this will happen. And so there will be, if I am correct about human nature, more poorly hit and lost animals because the technology will give some people a false sense of security.</p>	<p>We understand the concern and recognize that the issue has been debated within the archery community. Our recommendation to allow illuminated nocks is largely driven by the number of archery hunters who support them.</p>
<p>Will the state have more options hunting with a crossbow? Not just in firearm restriction areas.....Thank you</p>	<p>We are not proposing any expansion with this 2012-14 hunting season package.</p>
<p>Wondering why the rule for crossbows containing scopes in firearm restricted areas has not been changed and permitted. During the modern firearm season in firearm restricted areas, I am permitted to use a shotgun or muzzleloader with a scope on it, but am not permitted to use a crossbow with one on it. Wondering why this rule has not been changed since crossbows have been added to the use in shotgun restricted areas. I am hoping that this one of the rules that is being considered. Thank you.</p>	<p>We are recommending that scopes be allowed on crossbows used during the modern firearm seasons in firearm restricted areas. Your explanation hits the mark.</p>

COMMENTS	AGENCY RESPONSE
<p>I feel that the requirement for disabled hunters to get a vision disability permit is not warranted.</p> <p>This is my rationale:</p> <p>According to proposed crossbow use in firearm restricted areas during modern firearm season a crossbow with scope would be permitted. That is great a positive change for our state.</p> <p>Crossbows are sold with a scope or red dot sight as a complete package or system. The scope/sight is specific to the crossbow it is mounted on and designed for the speed of that crossbow.</p> <p>Crossbow scopes/sights are low/no magnification typical 3x, 4x, as high magnification would not allow for good view of game to be taken at the ethical yardage of up to 40 yds.</p> <p>There are only three companies that might have peep/pin sights and one company that makes a fiber optic sight accessible for sale. Why should one have to buy something extra?</p> <p>People with disabilities already have a financial burden, so I feel it is unwarranted to require them to go to the additional expense of finding a peep/pin system, have a machinist modify their crossbow, or buy a crossbow that may or may not have a peep/pin sight to fit, or buy a fiber optic sight at additional expense.</p> <p>I understand that the definition of scope for the state is roughly two pieces of magnifying glass held together by a tube. But an exception could be written to specifically state, a crossbow scope/sight designed for crossbows can be used by disabled hunters during archery season; battery augmented crossbows scopes/sights not permitted.</p>	<p>We appreciate your support for our recommendation to allow scopes on crossbows used during the modern firearm season.</p> <p>The archery community does not consider crossbows as archery equipment for hunting. We are allowing hunters with disabilities to use a crossbow during archery seasons as an accommodation for specific disabilities that would prevent them from even using a specially equipped bow.</p> <p>Allowing the use of a scope goes beyond what is generally applied as an accommodation unless the person also has a qualifying vision impairment.</p> <p>We understand that sometimes it is difficult to convince equipment manufacturers to produce what is desired, but since there are options available and even your company sells one, it is still a reasonable accommodation for disabled archery hunters.</p>
<p>A correction needs to be made to verbiage appearing in WAC 232-12-54, 2, (a). Unintentionally the words "or less" makes all bows, regardless of peak weight, illegal because any bow when only partially drawn will measure less than forty pounds of pull.</p> <p>I suggest this be cleaned up before it causes a legal hassle. The simplest way would be to drop the last four words entirely. But if the intent is to make certain that there is forty pounds of force behind any arrow (man's, woman's or youth's), then that would be accomplished by replacing the word "less" with the words "at full draw".</p>	<p>We have incorporated your suggestion for clarity.</p>
<p>I feel that mechanical broad heads should be allowed. The reason I have heard for non use is the reliability factor. I would agree except the styles today are sold as reliable openers since the majority do not use the rubber band to hold blades in place. We have grown into the equipment we use today and really why not mechanical?</p>	<p>The archery community still does not feel that mechanical broad heads function reliably enough to recommend their use. Even if they are 95 percent reliable, that would mean that 5 percent might inflict a less than lethal arrow into an animal.</p>
<p>We support the use of illuminated nocks for archery hunting. We think it helps with retrieval of the arrows and game.</p>	<p>Thank you for your support.</p>
<p>We do not support electronics on archery equipment including illuminated nocks. Archery wounding loss is no different than other weapon types and we don't need illuminated nocks because they won't help with retrieval of game.</p>	<p>It is not known what the impact of illuminated nocks will be for retrieval of game. However, the majority of archers responding to WDFW surveys indicated support for the regulation.</p>
<p>Don't support a need for lighted nocks because of the technology improvements and need to hold the line.</p>	<p>The issue of technology will probably continue to be debated long into the future of hunting.</p>
<p>Pope and Young criteria is for recording records and not the right measure for equipment rules.</p>	<p>We understand your perspective. The ethical statements from several respected organizations are often cited regarding what should be considered fair chase in hunting regulations.</p>

COMMENTS	AGENCY RESPONSE
Lighted nocks are not an answer for poor judgment. Their use may encourage hunters to exceed their abilities.	We agree that hunters should always base their decisions on good judgment. The effect of illuminated nocks on judgment is largely unknown.
The survey results were biased and do not represent the desires of most archers.	While the survey was not random, it is our belief that a significant majority of archers support illuminated nocks. Our belief is largely based on our experience and the large number of respondents (3000+).
There is limited economic benefit from the sale of illuminated nocks.	Economic benefit was not a significant consideration in WDFW's decision to facilitate the debate on illuminated nocks.

WAC 232-12-243 Public safety cougar removals.

A. Agency reason for adoption: This amendment better aligns the WAC language and actions with the terms used in the RCW authority.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- None.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
I urge you [commission] to accept the proposed changes offered by the Washington Department of Fish and Wildlife regarding the public safety cougar removal program in the 2012-2104 hunting package.	Thank you for your comment.

WAC 232-12-257 Use of decoys and calls.

A. Agency reason for adoption: Rule-making was initiated at the request of the hunters who would be governed by those rules.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Under subsection 1, reinstate the word waterfowl, so that the first sentence now reads: "It is unlawful to hunt waterfowl, wild turkeys, or deer with the use of aid of battery-powered or other electronic devices as decoys. After considering the information presented and the public input received, the Fish and Wildlife Commission voted against this proposed amendment.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
Spinning-winged decoys promote wastage and inefficient harvest of waterfowl.	Electronic decoy studies have not shown effects on wounding loss rates.
Allow only electronic decoys that do not simulate wing motion.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
The WDFW internet survey was biased.	Participants in WDFW internet surveys were not selected at random from the hunting population, but results of the electronic decoy survey only considered responses from waterfowl hunters.
Allowing electronic decoys will add revenue for WDFW and waterfowl related sales.	Electronic decoy studies have not shown effects on hunter recruitment rates or revenue.

COMMENTS	AGENCY RESPONSE
Motorized decoys take the skill out of hunting, provide an unfair advantage against the ducks, and are not “fair chase.”	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Retaining the existing prohibition on electronic decoys will help to preserve waterfowl hunting tradition and heritage.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Electronic decoys will not make a significant difference in the amount of birds harvested over the duration of the season.	Studies have shown that electronic decoys increase kill rates by 1.3 to 33 times over traditional decoying methods, but effects on overall population harvest rates are not currently known.
Electronic decoys are no different than other ways to create motion in decoys, and make it easier for older hunters.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Electronic decoys have the potential to adversely impact locally breeding waterfowl, with evidence suggesting that immature females may be the component of the population that will be adversely affected.	Recent information has shown increased vulnerability of immature female mallards to harvest relative to adult female mallards, coincidental to the advent of electronic waterfowl decoys.
Electronic decoys are legal in most states already and are just another tool that can be used on days when nothing else works.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Allowing hunters to use electronic decoys will require other hunters to use them to be successful.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Electronic decoys reduce wounding loss.	Electronic decoy studies have not shown effects on wounding loss rates.
Electronic decoys should not be allowed because they are no different than baiting, use of live decoys, or recorded calls.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Allowing electronic decoys would do little to increase waterfowl hunting participation or license sales.	Electronic decoy studies have not shown effects on hunter recruitment rates or revenue.
Electronic decoys only benefit guides seeking to maximize successful hunts.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
The proposed rule would enable purchase of controllers designed to operate up to 24 units off of one 12 volt battery. New technology that may soon become available would further enable hunters to abuse electronic decoys.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.

COMMENTS	AGENCY RESPONSE
Surveys show that the hunting public likes the idea of battery operated decoys.	A 2002 survey by a public opinion research firm (Responsive Management) showed that 48 percent of Washington waterfowl hunters and 66 percent of the general public agreed that increased regulation of hunting technology (e.g. motorized waterfowl decoys) was important. Informal surveys of waterfowl hunters indicate that many (46-57 percent) favor the use of electronic waterfowl decoys as long as seasons are not affected, a smaller group (29-40 percent) oppose their use, and the smallest group (11-20 percent) favor their use regardless of potential impacts on seasons.
Of the lower 48 states, 46 allow electronic waterfowl decoys.	Of the lower 48 states, 43 have no restrictions on electronic waterfowl decoys. Of the 5 states that have restrictions, 2 have partial restrictions and 3 have complete restrictions.
Electronic decoys are helpful for new hunters.	Electronic decoy studies have not shown effects on hunter recruitment rates or revenue.
There is no scientific data from the U.S. Fish & Wildlife Service that demonstrates that the use of battery operated decoys is detrimental to waterfowl.	Studies have shown that electronic decoys increase kill rates by 1.3 to 33 times over traditional decoying methods, but effects on overall population harvest rates are not currently known.
The use of this device should be the hunter's choice.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
There is an ethical issue in not allowing the use of these decoys, in that the vast majority of states already allow them.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
One of the greatest rewards of participating in the sport of waterfowl hunting is that even on days with no birds taken, one can count on having an enjoyable day viewing wildlife present in the marsh. Having multiple electronic decoys operating in every direction would detract from this experience.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
States that allow electronic decoys have more restrictive seasons, and these decoys jeopardize liberal seasons in the West.	Studies have shown that electronic decoys increase kill rates by 1.3 to 33 times over traditional decoying methods, but effects on overall population harvest rates are not currently known. If electronic decoys cause harvest rates to increase as populations decrease, conservative seasons would occur more frequently.
Washington's continued prohibition on electronic decoys would retain more uniformity in the three states that contribute the most harvest in the Pacific Flyway.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Spent shot shells are a litter problem on many public hunting areas and discarded batteries would contribute to this problem.	Litter is a constant problem on many areas and littering is not allowed under wildlife area rules. The potential effect of discarded electronic decoy batteries on wildlife area litter problems is difficult to predict.
Allow electronic calls for waterfowl hunting.	Electronic calls for waterfowl hunting are not permitted under federal regulations, except during certain late seasons in other flyways.

COMMENTS	AGENCY RESPONSE
WDFW conducted a random survey of hunters that showed 70% would like to see electronic waterfowl decoys allowed.	A 2002 survey by a public opinion research firm (Responsive Management) showed that 48% of Washington waterfowl hunters and 66% of the general public agreed that increased regulation of hunting technology (e.g. motorized waterfowl decoys) was important. Informal non-random surveys of waterfowl hunters indicate that many (46-57%) favor the use of electronic waterfowl decoys as long as seasons are not affected, a smaller group (29-40%) oppose their use, and the smallest group (11-20%) favor their use regardless of potential impacts on seasons.
Electronic decoys result in less wounding loss	Electronic decoy studies have not shown effects on wounding loss rates. Hunters are responsible for determining effective shooting range and when to take shots, regardless of decoying method.
Allowing electronic decoys would increase waterfowl hunting participation and license sales, and assist new and inexperienced hunters.	Electronic decoy studies have not shown effects on hunter recruitment rates or revenue. Several surveys on waterfowl hunter recruitment and satisfaction have shown that factors other than regulations (e.g., access) provide the most influences.
There should be an extra fee or endorsement for using electronic decoys.	This proposal is beyond the scope of the rule and would need to be approved by the Legislature.
The cost of electronic decoys should not be a factor because certain types are inexpensive.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations.
Bag limits control harvest and everyone should have a reasonable expectation of taking a limit.	Studies have shown that electronic decoys increase kill rates by an average of 2.4 times (ranging from 1.3 to 33 times) over traditional decoying methods, but effects on overall population harvest rates are not currently known.
Support the proposed WAC amendment to allow waterfowl decoys.	The department has brought the issue to the Commission and the public for discussion purposes. A wording change was necessary to have the issue filed with the Code Reviser.
This issue is related to fair chase issue and perception, rather than effects on wounding loss.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations. Electronic decoy studies have not shown effects on wounding loss rates. Hunters are responsible for determining effective shooting range and when to take shots, regardless of decoying method.
Because the regulation still allows mechanical and wind powered spinning wing decoys, it only addresses convenience versus fair chase.	Thank you for your comments. WDFW is asking the Fish and Wildlife Commission to consider appropriate limits on technology for hunting and effects on ethical standards/fair chase considerations. We are not aware of studies comparing battery-powered with non-electronic spinning wing decoys. It is suspected that effectiveness of spinning wing decoys is related to wing revolutions per minute (rpm), so mechanical and wind powered versions may be less effective than electronic versions.

WAC 232-12-264 Baiting of game birds – Unlawful.

A. Agency reason for adoption: This amendment was requested by the Washington Fish and Wildlife Commission, subsequent to a Commission presentation in September 2009, to facilitate consistent enforcement of state and federal baiting rules by the Department and U.S. Fish and Wildlife Service.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- None.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
Prohibit waterfowl hunting over flooded corn fields.	The proposed rule is intended to align state and federal baiting regulations. Expanding the scope of the amendments might violate criteria of the Governor’s rule making moratorium.
Also, something needs to be done about the baiting regulations for waterfowl. I read the proposed "clarifications" and am more confused than ever. Even my lawyer can't figure out what is legal. I have called for wardens to check on a field to see if it is a legal to hunt over, and the ones who have checked give different opinions. This past year we have quit hunting a field that has been hunted for 20 years because over confusion on the baiting issue.	The proposed rule is intended to align state and federal baiting regulations. Asking for clarification from field staff is the best way to determine if you are operating within the regulations.
I think that having flooded corn ponds should be illegal. Those four to five main guys that have all these flooded corn ponds in the Othello, Basin City, and Royal City area have totally changed the pattern of the ducks. The ducks totally skip where they used to go and head straight for the flooded corn. It's an unfair advantage. It doesn't give us public land hunters much of a chance to have good duck hunting when there are no ducks in those areas since they are getting water and food at the same time.	The proposed rule is intended to align state and federal baiting regulations. Expanding the scope of the amendments might violate criteria of the Governor’s rule making moratorium.
Prohibit baiting of game birds.	Baiting of game birds is prohibited under state and federal regulations. The rule amendment proposes to standardized language between state and federal regulations.

WAC 232-28-273 2012-2014 Moose, bighorn sheep, and mountain goat seasons and permit quotas.

A. Agency reason for adoption: This rule incorporates permit level changes based on the population thresholds and criteria in the Game Management Plan (2008).

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Change the permit level for Cleman Mountain A from 3 to 6; change the permit level for Cleman Mountain B from 2 to 6. The reason is that recent surveys indicate the population has increased.
- Change the name of the Methow North mountain goat hunt name to “Methow” because the goat hunt area is not just the north Methow area.

- Change the subpopulations open to goat hunting to:
 - Wolf Creek and West Fork Methow in the Methow hunt.
 - Railroad Creek, Pyramid Mountain, and Box Canyon in the South Lake Chelan hunt.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
I believe that the two California Bighorn Sheep tags included in the South-central and North-central raffles should now be returned to the general draw to help offset the reduction.	The Department is not recommending any reductions in general bighorn ram permits in Chelan or Okanogan Counties. The reduction in bighorn ram permits in south-central Washington were based on recent surveys where a rather large group of rams where not observed. In the most recent survey, the large group of rams was accounted for in the Clemans Herd. As such, the Department is recommending increasing the permit levels.
I was very pleased to see a goat tag added on the south shore of Lake Chelan, but a suggestion I have made to some of the bios in the past is why not move the season later in the year- say 11/1-12/31.	Thank you for your comment. The Department has generally set goat seasons for earlier in the fall, because later during the winter goats tend to migrate into areas of dense timber. In addition access tends to be more limited during the winter months.
I would like to see the Any Moose permit remain the same for GMU's 113 (17) & 117 (22). Add an additional 2 antlerless permits for youth in GMU 117 (2) & GMU 124 (10). Add additional 2 antlerless permits for seniors in GMU 117 (2) & GMU 121 (2). Add additional 2 antlerless permits for Disabled in GMU 117 (3).	Thank you for your comments. Moose permit numbers are set based on annual surveys and the status of moose populations. The Department is not proposing additional permits beyond our recommendation because the moose survey data does not support increases.
Why are you cutting ram sheep tags on Clemans and Tieton?	The reduction in bighorn ram permits in Clemans and Tieton were based on recent surveys where a rather large group of rams where not observed. In the most recent survey, the large group of rams was accounted for in the Clemans Herd. As such, the Department is recommending increasing the permit levels.
In the Naches Pass, Blazed Ridge and Bumping goat units, we have mature billies dying of old age. The three units I listed could easily handle an increase of permits by up to 2 per unit.	Permit levels for goats are set at 1-4 percent of the population for goat herds exceeding 100 animals (excluding kids). For herds just over 100 animals, the permit level is typically closer to 1 percent of the population. For herds of a few hundred animals, permit levels are typically closer to 4 percent of the population. These percentages also include tribal harvest when known.
Please start a point system for goat permits.	Thank you for your comment. The Department currently has a point system for mountain goat permits.

WAC 232-28-286 2013, 2014, and 2015 Spring black bear seasons and regulations.

A. Agency reason for adoption: This rule is intended to reduce tree damage by bears; disperse harvest geographically and reduce female harvest; and reduce nuisance and damage activity, while maintaining long-term sustainable populations.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Change permit levels for the 49 Degrees North hunt and the Huckleberry hunt from 25 to 50. This change was made at the request of the Fish and Wildlife Commission to provide additional recreational opportunity, while attempting to address depredation on deer.

- For the Monroe hunt, delete Green Crow as a participating landowner and add Campbell Group. The reason is Campbell Group purchased Green Crow lands.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>I believe that spring black bear harvest should be increased using the permit system already in place. Due to the risk of hunters misidentifying species, baiting should be considered to help eliminate the killing of Grizzly bears and black bear sows with cubs. It is my opinion that baiting would allow a hunter to observe the animals before attempting a kill. Due to the thick underbrush in NE WA, hunters are often faced with the decision to make hasty shots without enough time to observe the animal.</p>	<p>Thank you for your comment. At this time, the Department is closely monitoring the black bear harvest in NW Washington and other areas, as the median age of female bears is below objective. Baiting is a very successful method of harvesting bear; however, it has been banned by initiative and the Commission has no authority to change it. The Department has launched an online black bear-grizzly bear identification test to help hunters avoid misidentification. The new online test will be published in the 2012 Hunting Rules Pamphlet.</p>
<p>Increasing the spring bear harvest in Region 1 would be a good move; we have a very BIG black bear problem here in NE Washington. I am a logger here and I saw 27 black bears from the road last year and most everyone else that works in the woods have the same encounters with the numbers of bears seen. Fifteen years ago it was a surprise to see one and every one would talk about seeing one when they did see one. So I am all for this; it would be great to see the numbers come down a little, but I doubt that adding to the season will be much of a help now that the numbers are extremely high.</p>	<p>The Department is not recommending an increase in spring bear harvest in northeastern Washington at this time. The median age of female bears is below objective; however, the number of bears harvested in the last two years has declined, and the Department is hopeful that there will be an observed response in the next couple years in the median age of harvest females. As such, the Department is recommended status quo seasons.</p>
<p>Additional westside spring hunts is not a necessity at all unless done on state owned lands where bear populations are larger. Some of the current ones are set up to create opportunity, but do nothing at all for timber damage. Off unit poaching is out of hand.</p>	<p>Thank you for your comment. The Department is not recommending additional spring bear hunting in western Washington at this time. The Department is currently working with the Department of Natural Resources for a potential spring bear hunt on some of their lands. If that item moves forward, it would be under consideration by the Commission in June 2012.</p>
<p>Thank you for expanding permit numbers and extending the season in the northeast.</p>	<p>Thank you for your comment. The Department is not recommending additional spring bear hunting in northeastern Washington at this time. The median age of female bears is below objective; however, the number of bears harvested in the last two years has declined, and the Department is hopeful that there will be an observed response in the next couple years in the median age of harvest females. As such, the Department is recommended status quo seasons.</p>
<p>Leave the bear hunting as is.</p>	<p>The Department has revised the recommendation to status quo bear seasons.</p>
<p>Please consider a westside spring bear season that is general.</p>	<p>Thank you for your comment. Spring bear hunts are used as a management tool in western Washington to address tree damage by bears. The Department and participating landowners believe that limiting participation through a drawing process is appropriate given the objectives of the hunt.</p>

WAC 232-28-288 2012-2014 Fall black bear hunting seasons and regulations.

A. Agency reason for adoption: This rule, through the establishment of 2012, 2013, and 2014 fall black bear seasons, provides recreational harvest opportunities for black bear, while maintaining long-term sustainable populations.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- For the South Cascades Black Bear Management Unit, change opening day to Aug. 15 for 2012, 2013, and 2014. Though population status indicators suggest the need for a slight reduction in bear harvest, bear harvest declined following season reductions in 2009-2011, and it may take a couple more years for the population indicators to reflect the population response to those reductions. Therefore, the agency is reinstating status quo seasons for this unit. Additionally, Aug. 15 was chosen to simplify the season dates by using a constant date rather than a calendar date change every year.
- Change the opening day in the Okanogan and Northeastern B Black Bear Management Units from Aug 18, 2012, Aug 17, 2013, and Aug 16, 2014 to Aug 15, 2012, Aug 15, 2013, and Aug 15, 2014. The reason for the change is to simplify the season closure dates to a constant date rather than a calendar date change every year. There is no biological impact.
- For the Northeastern A black bear management unit, change opening day to Sept. 1 for 2012-2014 seasons. This changes bear season in the unit back to status quo. The reason for this change is the population status indicators suggest the need for a slight reduction in bear harvest; however, bear harvest declined following season reductions in 2009-2011, and it may take a couple more years for the population indicators to reflect the population response to those reductions.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>What exactly is the reason for taking an entire month off our season down here? How many landowner damage permits are being issued down here? I want to see the SCIENTIFIC reason for eliminating such a huge chunk of a season that has been there for years.</p>	<p>The Department has revised the recommendation to status quo fall bear seasons in the South Cascades. The median age of female bears is below objective; however, the number of bears harvested in the last two years has declined, and the Department is hopeful that there will be an observed response in the next couple years in the median age of harvest females.</p>
<p>Oppose the change in the fall black bear season start date from August 14 to September 1. I believe the start date should go back to August 1, like it had been for so many years prior.</p>	<p>The Department has revised the recommendation to status quo fall bear seasons in the South Cascades. The median age of female bears is below objective; however, the number of bears harvested in the last two years has declined, and the Department is hopeful that there will be an observed response in the next couple years in the median age of harvest females.</p>
<p>In reviewing the proposed hunting changes I was quite disappointed to see the NE bear hunting regulations change to the Tuesday after labor day. It is clearly crafted to eliminate the ability for someone to hunt through that weekend. Please reconsider allowing bear hunting over the labor day weekend.</p>	<p>The Department has revised the recommendation to status quo fall bear seasons in the Northeastern Washington. The median age of female bears is below objective; however, the number of bears harvested in the last two years has declined, and the Department is hopeful that there will be an observed response in the next couple years in the median age of harvest females.</p>

COMMENTS	AGENCY RESPONSE
There are plenty of bear in NE Washington. I would prefer the fall bear season remains unchanged in NE Washington beginning on Sept 1, or make it earlier like the Okanogan opening on Aug 15.	The Department has revised the recommendation to status quo fall bear seasons in the Northeastern Washington. The median age of female bears is below objective; however, the number of bears harvested in the last two years has declined, and the Department is hopeful that there will be an observed response in the next couple years in the median age of harvest females.
Leave the bear hunting as is.	The Department has revised the recommendation to status quo bear seasons.
Much of the East and North portions of the Okanogan Black Bear Management Unit are similar in population, habitat, and remoteness to the North Cascades and East Cascades management units. I recommend extending the later units so that the eastern boundary becomes Highway 97A North to the Methow River in Pateros; N up the Methow River to the Chewuch River confluence; continuing N up the Chewuch River to the Pasayton Wilderness boundary; then E and N along the eastern border of the Pasayton Wilderness to the Canadian border. This would increase hunting opportunities by about 15 days. Opening the season on Aug 1st when the bears are more diurnal in locations where populations appear very healthy, resilient, infrequently harassed.	Thank you for your comments. Black bear population indicators are within acceptable levels in the Okanogan bear unit. As such, the Department is recommending status quo.
Need to increase bear harvest in northeastern Washington. Bear population is expanding.	Thank you for your comment. The median age of harvested female bears in northeastern Washington has a declining trend over the past several years, suggesting that harvest is impacting the population. Until more information is available on the status of the living bear population, the Department is recommending status quo hunting seasons in northeastern Washington.

WAC 232-28-296 Landowner hunting permits.

A. Agency reason for adoption: This rule expands the number of special hunting opportunities available on private lands for hunters, in accordance with Fish and Wildlife Commission policy, by adding two additional cooperators to the Landowner Hunting Permit program.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Change the number of antlerless elk permits that the Blackrock Ranches LHP provides from 4 to 2. The landowner requested this change based on their management needs and ability to accommodate the hunters.
- Change the number of permits that WDFW draws for the Blackrock Ranches LHP for antlerless elk from 2 to 1 in two locations in the table. The landowner requested this change based on their management needs and ability to accommodate the hunters.
- Change the November start dates for the Pine Mountain Ranch LHP for deer and elk from November 2 to November 5 in two locations in the table. This corrects a previous error.
- Change all references to Grande Ronde Vista to 4-0 Ranch. This change was made at the landowner's request.

- Change the number of permits and season dates for the Columbia Plateau Wildlife Management Association LHP for elk to:

Hunt Name	Quota	Access Season	Special Restrictions	Boundary Description
CPWMA	2	Jan 1-Mar 31	Antlerless	CPWMA
CPWMA Raffle 1	2	Jan 1-15	Antlerless	CPWMA
CPWMA Raffle 2	2	Jan. 16-31	Antlerless	CPWMA
CPWMA Raffle 3	3	Feb 1-14	Antlerless	CPWMA
CPWMA Raffle 4	2	Feb. 15-28	Antlerless	CPWMA
CPWMA Raffle 5	2	Mar 1-15	Antlerless	CPWMA
CPWMA Raffle 6	2	Mar 16-31	Antlerless	CPWMA
CPWMA Raffle 7	2	Jan. 1-31	Any bull	CPWMA

The landowner requested these changes based on WDFW's recommended reinstatement of the December Master Hunter hunt in this area; their management needs; and ability to accommodate the LHP hunters.

- The landowner's phone number has also changed. This change reflects the new contact number.
- Change the number of permits and season dates for the Columbia Plateau Wildlife Management Association LHP for elk to:

Hunt Name	Quota	Access Season	Special Restrictions	Boundary Description
CPWMA 1	3	Jan 1-15	Antlerless	CPWMA
CPWMA 2	2	Jan. 16-31	Antlerless	CPWMA
CPWMA 3	3	Feb 1-14	Antlerless	CPWMA
CPWMA 4	2	Feb. 15-28	Antlerless	CPWMA
CPWMA 5	3	Mar 1-15	Antlerless	CPWMA
CPWMA 6	2	Mar 16-31	Antlerless	CPWMA
CPWMA 7	1	Jan 1-31	Any Bull	CPWMA

The landowner requested these changes based on WDFW's recommended reinstatement of the December Master Hunter hunt in this area, their management needs, and ability to accommodate the LHP hunters.

- The landowner's phone number has also changed. This change reflects the new contact number.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
The Columbia Plateau Wildlife Management Association's a reputable non-profit organization, and our proposal for an LHP is to provide access for hunters to private property in the area around Cheney, Washington, while helping property owners' manage hunter access and mitigate wildlife damage to their property. This will also help coordinate the harvest of elk in the area around the Turnbull Refuge. We will not charge an access fee during the general seasons or for those who draw a permit from the Department or win our raffles. (Two property owners also wrote in support of the LHP).	Thank you for your comments. The Commission developed a policy for private lands access that included the Landowner Hunting Permit program. As long as your organization fits the criteria for inclusion, then you are eligible for the hunts. The recommendation for your proposal is included in the Department's proposals.
Auctions or raffles of elk permits to the highest bidder should not be allowed. I do not support the LHP near Turnbull. It should not have resulted in the loss of the December Master Hunter general season hunt.	The LHP program has been established and adopted by the Fish and Wildlife Commission to promote hunter access. As long as the proponents meet the Commission's guidelines then they can be considered for inclusion in the program. While associated by geographic area and elk management issues, this LHP proposal is not connected with the Department's recommendations for Master Hunter hunts.
I am concerned that there is not an even distribution of permits between landowners and the public.	The split of permits necessary to encourage landowners to open their property to hunting was debated several years ago and resulted in the Commission policy on hunter access. This proposal is consistent with the policy.
We support the new landowner hunting permit cooperators.	Thank you for your support.
The hunt-by-written-permission signs don't contain sufficient information to contact the landowner. In addition some landowners never return phone calls, and I suspect they are not allowing access to the general public.	We appreciate your concerns and encourage you to contact your local WDFW to report these problems. However, this is not related to any regulation changes currently being considered.

WAC 232-28-297 2012-2013, 2013-2014, 2014-2015 Cougar hunting seasons and regulations.

A. Agency reason for adoption: This rule establishes the 2012-2013, 2013-2014, and 2014-2015 cougar hunting seasons, hunt areas, and associated harvest guidelines to provide recreational opportunity, while maintaining a stable population and age structure equally distributed across the state.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Change section 2(b) from:

“In hunt areas with a harvest guideline, starting January 1st, cougar hunters may hunt cougar from January 1st until the hunt area harvest guideline has been killed or March 31 of the following year, whichever occurs first.”

To:

“In hunt areas with a harvest guideline, starting January 1st, cougar hunters may hunt cougar from January 1st until the hunt area harvest guideline has been met and the Director has closed the cougar late hunting season, or March 31, whichever occurs first.” These changes were made to clarify that the season was intended to last three months rather than a year and three months, and that once the harvest guideline was reached the Director would close the cougar late hunting season.

- Under 4e, a couple of grammatical edits were made to improve readability and understanding of the rule.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>Now that we know harvest guideline numbers, I would ask you to consider starting the season in August and run until the end March with 2 tags.</p>	<p>Thank you for your comment. The Department has adjusted season dates in an attempt to maximize hunter opportunity during peak snow periods based on a history of public input. The Department did not recommended an August 1 season start date due to the potential for increase take of adult females with dependent kittens. The Department did not recommend adding a second cougar tag because it was not an issue that surfaced during our public scoping period. In addition, adding a second tag option would require significant workload issues within our WILD point of sale computer system.</p>
<p>We the Columbia County Commissioners request that, when you set the upcoming hunting regulations for cougars in the Blue Mountain area, you use a minimum harvest number of 16 percent or 20 adult cats. By WDFW's own information, this number will not severely hurt the healthy cougar population, but will address the concerns of a growing cougar population that is impacting our community negatively.</p>	<p>Thank you for your comment. The Department is recommending a 12-16 percent harvest rate for cougars in the Blue Mountain hunt areas. A 16 percent harvest rate for cougars (all cougars ≥18 months old) is equivalent to 14 cougars combining the three hunt areas in the Blue Mountains.</p>
<p>I noticed that GMU 105 quota is significantly below what the average harvest has typically been for that unit. I hope that someone can take a second look at this unit and verify that the quota is indeed in line with management objectives.</p>	<p>Based on a long-term research project in GMU 105, the allowable harvest for a stable cougar population is 2 cougar. This number is smaller than other harvest guidelines based on the relatively small size of GMU 105. Cougars are territorial, so small sized land areas have fewer cougars.</p>
<p>I would like to request that public input on harvest quotas be an annual or ongoing process.</p>	<p>The Department will be evaluating the harvest guideline system annually during the next 3 years and will adaptively make adjustments as necessary.</p>
<p>I think the harvest guidelines are too low, but I also think they won't be reach in several areas.</p>	<p>Thank you for your comment. The harvest guideline is set at 12-16% of the cougar population ≥ 18 months old (harvestable population). This corresponds to a stable cougar population that maintains social territoriality among adult males.</p>
<p>I think the harvest guideline is overly cautions. I think there needs to be more boot opportunity.</p>	<p>Thank you for your comment. The harvest guideline is set at 12-16% of the cougar population ≥ 18 months old (harvestable population). This corresponds to a stable cougar population that maintains social territoriality among adult males.</p>
<p>Increase the harvest guideline to 20 cougars in the Blue Mountains and make the entire Blue Mountains one PMU.</p>	<p>Thank you for your comment. The harvest guideline is set at 12-16% of the cougar population ≥ 18 months old (harvestable population). This corresponds to a stable cougar population that maintains social territoriality among adult males. Increasing the upper harvest limit for the Blue Mountains from 14 to 20% increases the risk of a population impact or loss of social territoriality in the adult male population.</p>
<p>I think cougar season in Stevens County should be August 1 to March 31.</p>	<p>Thank you for your comment.</p>
<p>I support the Department's recommendation, but have some concerns; the harvest guideline should be 25% below maximum sustained yield level, so recommend harvest rate of 10%.</p>	<p>Thank you for your comment.</p>

WAC 232-28-337 Deer and elk area descriptions.

A. Agency reason for adoption: The rule amendments allow the Commission to distribute hunters more favorably during quality hunts and help delineate when state authorized deer hunting is and is not allowed at a smaller scale within the Game Management Unit.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Reinstate the boundary for Elk Area 3068 Klickitat Meadows. Initially the Department was proposing dropping the special permit elk hunts that occur in this elk area. That is no longer the case, so the elk area boundary language needs to be retained in order to conduct the special permit hunts.
- Delete the boundary language for new Deer Area 1016. There was a miscommunication between staff.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>While the Moratorium seeks limited comment, the significance of the 2011 boundary change in GMU 652-653 and limited recourse for the property owners requires that these comments still be submitted. Your review and consideration is appreciated.</p> <p>The 2011 regulations substantially shifted the boundary lines in GMU 652 and GMU 653, subsuming numerous private properties in the process. Some of those properties were originally in GMU 652 and property owners hunted in the vicinity without need to draw a permit through the lottery. Now as part of GMU 653 those property owners/hunters must draw a permit in the lottery to hunt their own property. This is a dramatic change from decades of use and difficult for some when this was the sole reason for purchasing their property. While it is understandable that prior GMU 652-653 boundary lines made enforcement difficult, we believe other alternatives are available that would accommodate property owners/hunters formerly in GMU 652. As a result the following alternatives are provided for consideration:</p> <p>1. If the primary issue driving the boundary change was that the boundary lines were difficult to locate, then the GMU 653 boundary could easily be reset starting from the high tension power lines at the intersection of Highway 165 and run along those lines east northeast to their intersection with the White River. This would allow a clear line for hunters to access, roads for access for WDFW to access via East and West in an area that has the likelihood of the highest amount of hunting in the area, as compared to the outer limits of the City of Buckley.</p>	<p>1. The intent behind the change was to create an easily identifiable and enforceable boundary; however there were also trespassing and other considerations as well. Enforceability – it is important for GMU boundaries to be identifiable and enforceable, and the original boundary was neither. The 2011 boundary change has created an identifiable, enforceable boundary.</p> <p>The power line boundary option that was presented by petitioners created an identifiable boundary, but our local enforcement staff expressed serious concerns about its enforceability as access would be extremely limited.</p> <p>Land ownership issues – The original boundary included all of Hancock Timber Resource Group (Hancock) in one GMU, and the 2011 retains that aspect. The power line boundary option cuts through Hancock, creating more land management problems for the landowner and any enforcement entity that was called to enforce trespass issues (e.g., WDFW or Pierce County Sheriff).</p> <p>WDFW has received a letter from Hancock supporting the 2011 GMU boundary location and has contacted WDFW staff with concerns that a change to the power line would increase trespass violations on their property. WDFW enforcement officers report that calls for their response to trespass violations in the area of concern have decreased dramatically since the 2011 boundary change.</p> <p>Acres: The 2011 boundary change moved a total of 4, 610 acres into GMU 653 – a 1 percent reduction in GMU 652 acreage. Within the changed area, there are a total of 1,675 acres of “hunnable” area (i.e., not in Buckley city limits, or otherwise owned/managed for no trespassing or no hunting without a permit).</p> <p>Landowners: There are approximately 214 landowners in the “hunnable” area with an average parcel size of 4.7 acres. There are approximately 35 landowners who own parcels over 10 acres in size and only 16 of those own more than 20 acres. The number of landowners who own property that could easily be hunted is fairly small.</p>

<p>Continued...</p> <p>2. Alternative two proposes Ryan Road as the boundary for GMU 652-653. (Ryan Road east from Highway 165 to the Kapowsin Tree Farm ownership line then north to the White River). This would provide WDFW with a means of access to patrol all areas of the City of Buckley, as well as quick identification of poachers' locations because this provides a midway thoroughfare between the forested area to the south of the City of Buckley and the White River at the northern border of the City of Buckley. It would also provide easy access for WDFW vehicles and a means to surveil potential poachers parking near the city. This solution is a good compromise because it still provides WDFW with permit funds of the 653 GMU south of the City of Buckley, while at the same time reinstating the hunting privileges of numerous private property owners, by returning their properties back to GMU 652, north of Ryan Road. A final benefit would be the potential added revenue that hunters from out of the area would bring to the City of Buckley.</p> <p>3. Alternative three calls for private property owners in GMU 653 to have an open archery season for elk on their private property, as long as there is no showing of a decline of the elk population in the vicinity. Currently there is no showing of a declining population in this area.</p> <p>4. Alternative four calls for private property owners in GMU 653 to purchase the right to have an open archery season for elk on their private property, assuming the purchase price is a modest amount. This is a "win-win" for the private property owner and WDFW. This would allow the private property owner to retain the ability to hunt on their private property and it would create another revenue stream for WDFW.</p>	<p>Continued...</p> <p>2. WDFW, Region 6 has not received this suggestion until this comment was submitted. Additional time will be needed to evaluate the merits of this option. Consideration of a boundary line adjustment will be based on the objectives of the original boundary line adjustment – identification in the field, enforceability, and land management/trespass issues. If a boundary line adjustment is warranted, staff may develop a recommendation for consideration by the Fish and Wildlife Commission.</p> <p>3. Under current rules and policies this option is not available.</p> <p>4. Under current rules and policies this option is not available.</p>
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WAC 232-28-342 2012-2013, 2013-2014, 2014-2015 Small game seasons.

A. Agency reason for adoption: These rule amendments provide for the continuation of hunting seasons on small game species to provide recreational opportunity and depredation control.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Change the WAC title to read: “Small game and other wildlife seasons and regulations.” Rather than create a separate rule for unclassified wildlife regulations, the title was changed to allow the Department to retain the rules for coyotes and other unclassified or predatory wildlife.
- Proposed crow season dates have been changed from Sept. 1, 2012 - Dec. 31, 2013; Sept. 1, 2013 - Dec. 31, 2014; and Sept. 1, 2014 - Dec. 31, 2015 to Sept. 1, 2012 - Dec. 31, 2012; Sept. 1, 2013 - Dec. 31, 2013; and Sept. 1, 2014 - Dec. 31, 2014 to accurately reflect calendar date adjustments.
- Proposed turkey youth season dates have been changed to April 6-7, 2013 and April 5-6, 2014 to accurately reflect calendar date adjustments.
- Spring 2012 turkey season dates (April 7-8, 2012 and April 15-May 31, 2012) were inadvertently deleted from the CR102 and were added back into the draft rule.
- A new fall permit season has been added for GMU 335 (Teanaway) during Nov. 15 - Dec. 15 in 2012, 2013, and 2014, with 50 permits and a bag limit of 1 turkey (either sex), because of increased turkey numbers in this area.
- Spring 2012 turkey season dates for hunter education instructor incentive permits (April 15 - May 31, 2012) were inadvertently deleted from the CR102 and were added back into the draft rule.

- A senior hunt for pheasants in eastern Washington was added and runs concurrent with the western Washington season. This proposal was inadvertently left out of the initial proposal.
- Proposed eastern Washington pheasant season closing dates have been changed from Jan. 14, 2013, Jan. 13, 2014, and Jan. 12, 2015 to Jan. 13, 2013, Jan. 12, 2014, and Jan. 11, 2015 to end the seasons on Sundays.
- The emergency authority of the director is provided in statute and does not need to be repeated in WAC. Therefore, we are deleting this language from the WAC, but will include it in the pamphlet.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
What is happening with the crow hunting season? Are we exchanging a month at the end for a month at the beginning, or is the season year around?	The hunting season is shifting one month earlier at the recommendation of the Waterfowl Advisory Group. The issue is trying to time the fall migration of crows with the hunting season, so they advised us to start the season earlier. Then we must cut off a month at the end to comply with the Federal framework for total number of days available for migratory bird (crow) seasons. However, crows may be killed at any time if they are depredating crops.
I would like the crow season to extend into February rather than make it earlier in September. The crows that cause problems are more likely in February when food is limited. February is also a better time because there is less to hunt or fish at that time.	See the response listed above.
Why is there no squirrel hunting season in Washington? Certainly there are squirrel populations capable of supporting a season, e.g., eastern gray squirrels. Why don't we have a managed season?	Most of the introduced squirrels, e.g., eastern grays and fox squirrels are unclassified, and therefore, may be killed at any time. They tend to occur around human habitat in Washington, so there really isn't much interest in managing them as a game species.
I would like to see the pheasant hunt in the Sequim area continued past the 2012 season. Why is it scheduled to end next year?	The Department has worked very hard along with local pheasant hunters to keep our lease with the county to hunt pheasants on their property. We have also chased down every other site that we might be able to use for pheasant releases and hunting. We have come to the end of several extensions with the County and they do not want any more extensions. At the same time, no one has come up with an alternative site. We would greatly appreciate it if you would be willing share any information you have as to an alternative.
I would like the pheasant hunting season to extend a couple of weeks past the last release (end of November) on the Intalco and BP units of the Lake Terrell wildlife area. There seems to be very little problem with the waterfowl hunting there.	We have pursued this possibility, but the waterfowl hunter might disagree that there is not a conflict. Other units of the wildlife area do provide extended opportunity, and we encourage you to take advantage of those areas.
I would like to see the pheasant season returned to the first weekend in October. By the time we get out to hunt, the deer hunters have already stirred up the birds so badly you can't find them.	The opening day of pheasant season is constantly debated. No date works perfectly. When we open the pheasant season before the deer season, hunters and landowners complain that the deer were stirred up. Because this isn't a conservation issue or a major strategy for game management, we are not proposing any changes.

COMMENTS	AGENCY RESPONSE
<p>Why is there a \$13 fee for hunting snow geese? What are the results of the harvest report? What are the costs of management? Do waterfowl stamp fees cover the management costs? WDFW does a poor job of informing the public about why fees are necessary. My point is that snow geese should be taken off the harvest card program or provide an explanation of where the money is going.</p>	<p>The fee for migratory bird authorizations is to help cover the cost of managing those species and associated hunting. The harvest results are published each year as part of the Department's Game Status and Trend report (available on our website). A rough estimate of the revenue would include about 5,000 hunters who will purchase an authorization, so roughly \$65,000 in revenue. The authorizations cover band-tailed pigeon, Dusky geese, snow geese, and brant. We must conduct surveys for all of these species, monitor harvest, conduct field checks, and enforce the regulations. Without a detailed estimate, I think you can see that the cost of managing these species is well in excess of the revenues. Specifically for snow geese, we provide funding to support work on the wintering grounds in Russia even sending biologists over to assist with research projects every few years; we conduct special aerial surveys; we support hunter access programs and assist landowners with planting winter cover; and we heavily patrol and monitor the harvest seasons. Waterfowl stamp (permit) fees are designed to provide funding for habitat enhancement and protection, and yes, we have used some of these funds to encourage farmers to plant cover crops for snow geese.</p>
<p>Are crossbows legal for hunting turkeys? What are the firearm restricted areas for turkeys? Why not allow turkey hunting with crossbows statewide?</p>	<p>Crossbows are only lawful for use in firearm restricted areas. These areas are listed in the big game pamphlet. The use of crossbows for hunting has not been widely accepted by hunters at this point, but could be expanded in the future.</p>
<p>Can we change the chukar and hun season to run from November through February? This would extend the season for upland bird hunting; target mature, dispersed birds rather than young of the year; it would avoid issues such as snake bites and overheated dogs; and should not affect overall chukar harvest.</p>	<p>Upland bird hunters have many options with our current season structure. It is doubtful that delaying the start date would change participation. The concept for early season dates is that the peak of the upland bird population is in summer. Every month after hatching the population declines, so early seasons take advantage of maximum population levels.</p>
<p>Hunting turkeys in the fall with dogs is well accepted in the eastern part of the country (19 states) and in four states in the spring. It would help with recovery of birds; the enjoyment of hunting with dogs; could increase funding if a fall turkey tag was implemented; and provide a good overlap with fall forest grouse hunting. Can we allow it in Washington?</p>	<p>When we have brought up this issue in the past, most of the comments from turkey hunters have not been very supportive. It seems western hunters view turkey hunting a little differently than the eastern states.</p>
<p>What happens to the 2012 season for turkeys if the season is scratched in the WAC?</p>	<p>Good catch, we have corrected that error.</p>
<p>Rather than increase fall turkey hunting opportunities, you should increase spring harvest opportunities. That is when hunters are out and hunting turkeys. Also, you should go back to allowing a free turkey tag with the small game license.</p>	<p>Harvesting hens in the spring is not popular with turkey hunters. In the fall you are close to the highest population levels for game birds, so you can provide some either sex harvest. You are harvesting a lot of young birds that may not make it through the winter anyway. Providing a free turkey tag would result in a significant loss of revenue and a loss of turkey enhancement projects since one third of the revenue from the sale of turkey tags is dedicated to turkey management.</p>
<p>I would like to see the waterfowl season shifted 10 days later this year. It seems like the migration is later in recent years.</p>	<p>Waterfowl seasons are set in August, but we will keep your proposal in mind.</p>

COMMENTS	AGENCY RESPONSE
I would like to propose a pursuit season for raccoons from March 16 to August 30 th to keep our dogs in shape. You could require a field trial permit and bring in some revenue.	This is a poor time of year to have dogs chasing wildlife. It is when young of the year for most species of wildlife are born and vulnerable.
I think the early goose season should be brought back. There seem to be plenty of resident geese.	A September season is part of our proposal for 2012-14. We have exceeded our thresholds, and therefore, are recommending reinstating this hunt.
Let Master Hunters harvest turkeys when they cause damage.	We may be looking at this for the future.
The fall turkey seasons are too aggressive on public lands. They should be focused on private lands where problems occur. You should sign up landowners who have problems with turkeys and let hunters check online listings of these landowners.	While this isn't a hunting regulation, we like your idea and will look into this kind of a matching process.
Overlap the fall turkey season with the all of the fall deer and elk seasons to increase the harvest. Farmers need turkeys killed and harassed in November.	The concern is that overlap with modern firearm seasons would result in excessive harvest of hens and drive the population lower than necessary to reduce complaints.
Allow the use of rifles and handguns to kill turkeys in the fall.	Again, this would result in excess harvest and encourage shooting turkeys on the roost which many consider unethical. We appreciate your ideas and will keep working to address the complaints and problems from landowners.
There are plenty of turkeys in the area of south east Washington. Why don't we set a season that runs from Spring through Fall?	There are a couple of main reasons, one is that we might kill too many birds and the other is that this is the time when most wildlife have their young. They would be very vulnerable at this time of year. We are recommending an increase in the fall season for the Blue Mountains.
The NRA requests a repeal of the lead ammunition ban for upland game hunting on pheasant release sites.	The department received many emails and letters as a result of NRA's "Alert" regarding the restrictions on the use of lead shot. Early in the scoping process for the 2012-14 seasons, we decided not to consider additional proposals for non-toxic shot. We also are not considering repeal of the decision made by the Commission in 2009 that went into effect last year. We would like to work with NRA to better understand their views on this issue and others associated with hunting and how we might better coordinate rule making efforts in the future.
Support for starting the crow season on September 1 rather than October 1.	Thank you for your comment and support for the proposal.
Shift the youth waterfowl season into February.	Youth waterfowl seasons are set in August, and we will keep your suggestion in mind as regulation proposals are developed this year.
Allow falconers to use processed small game meat for feeding raptors without it being counted against possession limits.	Possession limit rules for falconry seasons related to small game are the same as for other methods of take. Processed meat is not normally considered part of field possession limits.
We support the senior pheasant hunting opportunity in eastern Washington.	Thank you for your support.
We would like to see the use of dogs for hunting turkeys in the fall similar to other small game such as grouse.	This issue has not been very significant to hunters at this point. With the Governor's suspension on unnecessary rules, this one just didn't move forward. However, it can be considered in future discussions.
We should expand the youth pheasant hunting season even longer than the current one.	Again, this issue did not come up during the public process, but could be considered in future hunting season discussions.

WAC 232-28-357 2012-2014 Deer general seasons and definitions.

A. Agency reason for adoption: This rule provides recreational deer hunting opportunity, protects deer from overharvest, and helps address deer damage problems through the establishment of 2012-2014 general deer seasons.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Move 157 (Mill Creek Watershed) from the section listing GMUs closed to deer hunting to the section listing the GMUs open only to permit hunting. Special permit hunts are now offered for deer in GMU 157 so the definition change is required.
- Under modern firearm, both early and late seasons, western Washington black-tailed deer:
 - Move GMU 454 from “any deer” to “any buck.” This change corrects an oversight/error.
- Under modern firearm, late general season, eastern Washington white-tailed deer:
 - Move the hunts specific to Deer Area 1050 and Deer Areas 1060, 1070 and 1080 to the Hunters 65 and over, Disabled or Youth section. These hunts were intended, under the original recommendation from the Region, to give more opportunity to youth hunters, senior hunters, and hunters with disabilities. This change corrects a typographical error.
- Under Hunters 65 and over, Disabled, or Youth general seasons:
 - For GMUs 101, 105, 108, 111, 113, 117, and 121, restore the 4 day season. For 2012 change the season dates from Oct. 19-21 to Oct. 18-21; for 2013 change the season dates from Oct. 18-20 to Oct. 17-20; and for 2014 change the season dates from Oct. 17-19 to Oct. 16-19. The original recommendation was to reduce these hunts by 1 day, but after further deliberation and public comment, that recommendation was removed.
- Under early archery general, eastern Washington mule deer:
 - Shift GMUs 162, 163, and 178 from the longer to the shorter early archery timeframe. This shift eliminates an overlap between the modern firearm special permit season and the archery general season.
 - Shift GMU 172 from the shorter to the longer early archery timeframe. There is no overlap with modern firearm seasons in GMU 172, and therefore, this GMU doesn’t need to be included in the shorter timeframe.
 - Delete Deer Area 1010 from early archery, eastern Washington mule deer, 3 pt. min. or antlerless. Deer Area 1010 is in GMU 162 and the season does not need to be inconsistent with GMU 162 at this time.
- Under early archery general, eastern Washington white-tailed deer:
 - Shift GMUs 162, 163, and 178 from the longer to the shorter early archery timeframe. This shift eliminates an overlap between the modern firearm special permit season and the archery general season.
 - Delete Deer Area 1010 from early archery, eastern Washington white-tailed deer, 3 pt. min. or antlerless. Deer Area 1010 is in GMU 162 and the season does not need to be inconsistent with GMU 162 at this time.
 - Shift GMU 172 from the shorter to the longer early archery time frame. There is no overlap with modern firearm seasons in GMU 172, and therefore, this GMU doesn’t need to be included in the shorter timeframe.
- Under late archery, eastern Washington white-tailed deer:
 - For GMUs 105 and 108, restore the any white-tailed deer season that runs from Nov. 25-Dec. 15. The original recommendation was to reduce the antlerless opportunity to 6 days, but upon further deliberation and public input from a variety of sources, that recommendation was removed.
- Under early muzzleloader, eastern Washington mule deer:

- Shift GMU 379 from 3 pt. min. or antlerless to 3 pt. min. Antlerless opportunity was offered in this GMU to mitigate damage complaints. Damage complaints are down and the antlerless harvest is no longer necessary.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>I note there is a proposal to eliminate antlerless deer hunting for senior citizens in Eastern WA. By the time this year's deer season opens I will be 77 years old. As a retired Forester I am very familiar with the woods having worked from Western Montana thru North Idaho and all of Eastern WA. I also am familiar with my capabilities in the woods at my present age. Quite frankly I am no longer capable of accessing most of the areas frequented by bucks during the general season. I am however capable of hunting the gentler terrain which may contain a doe or two. If the proposal is adopted you will in effect end my hunting career. It appears to me that the seniors are being asked to bear a disproportionate burden for the reduction in doe harvest. If a 50% reduction is necessary, for sound management, then I would think it appropriate to spread the reduction evenly among all those who have historically be afforded this opportunity. Although I am reluctant to propose it a redefinition "senior" might be appropriate at this time. Thank you for the opportunity to comment</p>	<p>The Department has entertained a number of different strategies to further reduce antlerless white-tailed deer harvest in the NE. For a variety of reasons none of the options seemed to be fully acceptable. Instead the Department is recommending status quo seasons for the senior, youth, and hunters with disabilities as well as the late season archery general seasons. Thank you for your comments.</p>
<p>Years ago youth hunting (Any Whitetail) used to extend into the late season in Unit 124. With the youth season "any Deer" being only the early season it really only gives the youth, 4 days being able to shoot a doe, being they are in school, and possibly living away from the area. This also restricts the Parent, Grand Parent, Friend that sits, walks with the youth, educating the youth on safe and ethical hunting, on the chance for them to hunt themselves in the early season. As a Parent of Twins it even makes it even harder for me to try and get my "Girls" to get there deer and then for me to have a chance to hunt myself. With reports of hunting population dropping, we need to keep the youth interested in hunting, to help with game management. Possibly split the youth and seniors for the late hunt and make it only the youth. For the most part I think unit 124 is doing just fine with its deer population, with all the B tags that are issued, and get the late season to hunt if I remember right. And possibly to certain areas of unit 124. I know it is already split up into three different areas for the B tags. Thank you for considering this change to help keep our youth interested in the sport.</p>	<p>For 2012, the youth hunting opportunity is Oct. 13-26 which will as you mentioned in your comment provide two weekends for any deer opportunity. But in addition in Deer Areas 1050, 1060, 1070 and 1080 (which are located in GMUs 124, 127, 130 and 139) there is additional any deer and antlerless opportunity for youth hunters in the Nov. 10-19 time period.</p>
<p>It stated right in the WAC that it's for protecting the deer from overharvest. The population of deer in the central Washington area is dangerously low. The seasons in the 300 GMU's should be severely limited or even closed for at least three season to allow time for the deer to recover.</p>	<p>The Department is aware that deer numbers are down in Region 3. We have recommended reduced opportunities in the last 3-year package, especially for antlerless hunting, to foster an increase in those deer populations.</p>

COMMENTS	AGENCY RESPONSE
<p>We suggest moving the antlerless hunt in these northeast units from the late general archery season to the early general archery season. The antlerless season would go from 6 to 7 days; this will provide 1 full weekend for youth hunters that are in school.</p> <p>These units need to have antlerless harvests conducted earlier in the season, which will eliminate the harvest of does that have been breed. The late September hunt would give archers that are willing to take a doe the opportunity to check for does that do not have a fawn. Also, many does will be saved since most archery hunters are not willing to take a doe in the early season due to the desire to hunt for a buck in the early part of the late season.</p> <p>The Buck-to-Doe Ratio is lower than desired in these units, and this new hunt would help create a better ratio prior to the breeding season. This will help get breeding completed in a timely manner, which will improve the body condition of bucks going in to the winter. Healthier bucks will have a better opportunity to survive a harsh winter and escape the high predator populations that exist in the northeast.</p> <p>Another reason for this recommendation is to improve the opportunity for youth, disabled, and senior hunters to harvest a deer without the need for a special permit hunt. More and more youth are selecting to hunt with archery equipment for numerous reasons. These young hunters are the future of WDFW's revenue stream, and expecting them to have their initial experience with archery hunting in a 4-point minimum area and in some of the worst weather conditions is ridiculous. We need to be promoting the best opportunity we can to get youth, disabled, and seniors into the field during comfortable conditions with a fair chance to harvest an animal. Hopefully this will keep them interested in the hunting opportunities that Washington has to offer.</p>	<p>We received 11 identical messages like this from individuals supporting one organization's proposal. The Department has entertained a number of different strategies to further reduce antlerless white-tailed deer harvest in the NE. For a variety of reasons none of the options seemed to be fully acceptable. Instead the Department is recommending status quo seasons for the senior, youth, and hunters with disabilities as well as the late season archery general seasons. Thank you for your comments.</p>
<p>Drop the 4 point minimum for buck deer in GMU 117 & 121 GMU 113 deer herds has suffered enough with deer hunters from these GMU's 117 & 121 hunting in this unit, any buck, to set the buck/doe ratio out of control. Our deer herds of GMU 113 were depleted of mature bucks. If deer hunters in GMU's 117 & 121 could not find a 4 point in that area, they moved into GMU 113 to fill their tags with any buck. Also, if a GMU 117 & 121 deer hunters did not fill their tags, do you think they will buy 2012 deer tags to hunt GMU's 117 & 121 again, doubtful? Youth, seniors and disabled took a real shot of not filling buck tags when this proposal was presented to Commissions & passed! Help 2 GMU areas increase 4 point or better but killing off GMU 113 in spite of the any buck deer status. This does not make sense! I expect deer tags sales in GMU 117 & 121 to be only half of 2011 tag sales ... Good Luck!</p>	<p>The Department will continue to watch the harvest trends for deer in NE as the deer populations and hunters respond to the new regulation. The Fish and Wildlife Commission is maintaining this regulation through the upcoming 3-year package of 2012-2014. The Department is not recommending any changes to the 4 pt. restriction.</p>

COMMENTS	AGENCY RESPONSE
<p>I am not opposed to the majority of rules changes that have been proposed, however; I find one proposed change in particular bothersome. Specifically that proposal to eliminate the senior antlerless deer hunt. I cannot believe that the seniors have a larger impact on the antlerless deer than the archery seasons (which include generous late season and early season dates). My estimations from the 2011 rules show the archers are given 23 days early and 15 days late for an estimated total of 38 days with the late being either buck or doe; the seniors received a very generous (sarcasm here) FOUR DAYS!</p> <p>I fully comprehend that the WDFW has bent over backwards in recent years to the archery lobby while continuing to degrade the hunting seasons for the other than bow and arrow crowd, but really where is the disconnect here? Four days for senior citizens vs. the archery folks! I should point out that I am NOT a senior citizen hunt eligible hunter. Should this singularly distasteful proposal be adopted I personally, for the first time in my hunting history, consider forgoing purchase of deer tags and special hunt applications which will destroy my points pool a sacrifice I'm willing to make; further I will do my utmost to get the word out to publicize my intentions.</p> <p>You should know that I am fully aware of the decline in deer numbers and appreciate that something needs to be done so the population can recover; I am even in favor of selectively closing game units to hunting entirely on a rotating basis, or if needed closing an entire season. Another idea might be to level the playing field between the modern firearm and archery seasons allowing the same number of days for each group. I know that the archery folks will cry unfair to a proposal of this nature saying it's so very much harder to harvest a deer with arrow than bullet; I would say it's so unfair to be allowed twice as many days, no hunter orange requirement and generous "rut" seasons.</p>	<p>The Department has entertained a number of different strategies to further reduce antlerless white-tailed deer harvest in the NE. For a variety of reasons none of the options seemed to be fully acceptable. Instead the Department is recommending status quo (4 days) seasons for the senior, youth, and hunters with disabilities as well as the late season archery general seasons. Thank you for your comments.</p>
<p>I see you professional game experts are proposing to cut the deer season by 5 days in GMU 117 and 121 in the late season. How about adding a few days to the end of season instead of stopping on the 19th of November let's run it about 4 days longer so we can hunt the rut, 4 point restrictions warrant this extension. I have been hunting whitetails in the Chewelah area for 40 years and the peak of the rut is not the 19th of November never has and never will be. If you game officials would get out of your trucks and do some looking you would realize this. Quit giving all the good seasons to the archers take away the late season archery hunting over bales of alfalfa that's not hunting that is slaughter; that's the only way these so called archers get these big bucks and elk. I don't know if it's illegal but it should be! You can't bait bear but you let these archers bait whitetails? Give me a call and we can discuss this.</p>	<p>The Department's intention is to provide two full weekends to late season deer hunters and end the season on Nov. 19th without overlapping with the last weekend of the modern firearm elk season. In the last 3-year cycle the calendar fell in such a way to make that impossible. So to provide the two full weekends to late deer hunters we had to overlap with the last weekend of modern firearm elk. This 3-year cycle the calendar allows us to avoid recommending the deer and elk overlap. This year we are recommending modern firearm elk to end on Sunday Nov. 4, and late deer to begin on Saturday Nov. 10. Those dates will continue to shift with the calendar each year.</p> <p>Ending the late season on Nov. 19th has been the standard since 2000. That was determined 12 years ago by examining kill date data for bucks in the late season. Ending the late season on the 19th provides hunters the opportunity to hunt deer while they exhibiting rut behavior but reduces the chance of overharvesting bucks by running the hunting season through the entire breeding season.</p>

COMMENTS	AGENCY RESPONSE
<p>In recent years past (including 2011 season), the late modern firearm deer season in the Northeast GMU's such as 113 has had a duration of around 15 days. Why does 2012 – 2014 propose duration reduction to 10 days (e.g.: November 10 – 19, 2012)? It is disappointing that hunting license fees continue to increase, but season durations decrease.</p>	<p>The Department's intention is to provide two full weekends to late season deer hunters and end the season on Nov. 19th without overlapping with the last weekend of the modern firearm elk season. In the last 3-year cycle the calendar fell in such a way to make that impossible. So to provide the two full weekends to late deer hunters we had to overlap with the last weekend of modern firearm elk. This 3-year cycle the calendar allows us to avoid recommending the deer and elk overlap. This year we are recommending modern firearm elk to end on Sunday Nov. 4, and late deer to begin on Saturday Nov. 10. Those dates will continue to shift with the calendar each year.</p> <p>Ending the late season on Nov. 19th has been the standard since 2000. That was determined 12 years ago by examining kill date data for bucks in the late season. Ending the late season on the 19th provides hunters the opportunity to hunt deer while they exhibiting rut behavior but reduces the chance of overharvesting bucks by running the hunting season through the entire breeding season.</p>
<p>Once again if I or any other MUZZLELOADER HUNTER is a YOUTH, DISABLED, OR SENIOR, HUNTING WHITETAILS IN NORTHEAST WASHINGTON WE ARE BEING DISCRIMANATED AGAINST. We can only hunt any bucks, while modern hunters have a 4 day window to hunt any whitetail deer without a permit. WHY CAN'T WE ALSO GET AN ANY WHITETAIL HUNT DURING OUR SHORTER 9 DAY HUNTING SEASON?</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>Is the WDFW ever going to change up muzzle loading seasons? You have been running the same game units for 10 years. Deer and elk have not changed, and many of the units listed for elk, do not hold any game. As well as some units for deer listed don't hold white tail. If wild life bios are behind this then they need to look into what they are doing, because it makes them look like they don't know what they are doing.</p>	<p>That is not entirely true. In the last 3-year package (2009-2011) a large number of new GMUs were opened up to muzzleloader opportunity that hadn't been open before. The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>I am a current Washington State resident. I am disappointed to see the Selkirk general muzzleloader late season white-tailed deer hunt dates changed to begin after Thanksgiving. I am frustrated with the current trend of increasing hunting regulations that are not hunter friendly. Hunting for many is a family sport. Most adults work and most children go to school. This hunt was a family friendly opportunity to hunt deer during a time when families often have time off together. Please keep this hunt open during the Thanksgiving holiday and consider opening other hunts during the Holidays as seasons are already short and days off are difficult to come by for adults and children.</p>	<p>Whenever possible the Department tries to avoid an overlap between user group seasons, especially modern firearm with either muzzleloader or archery.</p> <p>The shift to a standardized start and stop date for these hunts allows us to offer some additional quality special permit hunts and avoids an overlap with modern firearm seasons.</p> <p>You are right that in 2012 the season will start on the Sunday after Thanksgiving, but in 2013 and 2014 the season will open well before and encompass entirely the Thanksgiving holiday which will be to your advantage.</p>
<p>Is there any talk about changing GMU 121, to a youth any buck hunt? And retaining the 4 point min for every one else?</p>	<p>Some members of the public have suggested an alternative like that but the Department is not recommending such a season. Having a variety of different restrictions for different user groups makes it extremely difficult to assess how a season structure might be functioning.</p>

COMMENTS	AGENCY RESPONSE
<p>I think that unit 117 should be opened to late muzzleloader even if it is only for a few days. There are not too many hunters using a muzzleloader and those who do would appreciate it even if it was not open to long.</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>Why is it that the WDFW puts the modern season earlier and earlier in October every year? Does no one listen to the hunters? I can't find one hunter who wants the season to start before the third weekend in October. If this trend keeps up I guess we will just quit buying licenses and tags or have you not already seen the trend. Success in the field is not measured by the kill but by the deer you see. I'm sick of hunting in 70-80 degree days when the deer sleep all day and don't move. How can I take my kids and my nephew out and keep saying hey the deer are there you can't see them because the Vegetation is too thick and the deer won't move because it's too hot. They will just give up on hunting altogether after all what's the point if you don't even see any deer. Please CHANGE THE SEASON TO OPEN THE THIRD WEEKEND IN OCTOBER. It just makes sense.</p>	<p>The season starts the first Saturday after October 10. Those dates will shift each year with the calendar. If the 10th falls on a Saturday the season will open on 17th which is the latest it will ever open under the current structure. The season also has to squeeze in with modern firearm elk, a variety of muzzleloader and archery seasons as well as any late deer seasons if they are available where you hunt. There really isn't any more room on the calendar.</p>
<p>As an archery hunter I feel it is unfair that you allow a 21 day rifle hunt in the GMU 388 right before and up to the first day of the late archery hunt there. For the last three years we have noticed a big decline in the bucks that are showing up there and can only contribute it to rifle hunters taking out these bucks. We do not have the ability to shoot at deer from 100 plus yards so obviously it is an unfair advantage for us. Perhaps giving us back spikes or bigger and does would give us a better chance to actually bag an animal. Another proposal would be to let the archers in before the rifles or limit the days for the rifle hunt and limit the quota for the rifle hunters. I realize we all share the love of hunting but it has been difficult to even get excited about the late hunt recently when the only choice we have is a three point or better and then not even see any. Thank you for your consideration.</p>	<p>There are 40 special permits in the modern firearm quality deer hunt. That season is proposed to run from Nov. 1-20 this year. Archers in that same GMU have a 28 day early general season and a 19 late general season. In 2010, the modern firearm special permit hunters killed 6 bucks. In 2011, the modern firearm special permit hunters killed 19 bucks. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>I'm a long time hunter in unit 121. Last year when I was shocked when I got the new Regulations "Whitetail 4 point min." We usually hunt with Muzzleloader in that area but with my 78 year old father and 13 year old son but with your radical changes you gave us no other option but to try modern rifle. The second weekend you allow antlerless for HUNTERS 65 And OVER, DISABLED, OR YOUTH GENERAL SEASONS modern rifle. I see no reason not to allow HUNTERS 65 And OVER, DISABLED, OR YOUTH for antlerless in Muzzleloader season. Thank you</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>Please make western Washington at least 2 point or better on deer, 3 point would be best. At least put it out for survey for the 2012-2014 seasons to see what hunters think. I'm sure most would agree with a point restriction. How do I get my point out there and heard or at least forward this to someone who cares and not just blow it off. Thanks concerned hunter.</p>	<p>At this time we are not seeing the need for additional antler point restrictions in western Washington. We are not making that recommendation at this time.</p>

COMMENTS	AGENCY RESPONSE
<p>Please add more bow hunter opportunity in the late deer season within the 200 GMU's, to alleviate overcrowding within the Swakane GMU, preferably ALTA GMU 242. Current mule deer opportunity for archery hunters in the late season is very limited and forces the entire user group to a few GMUs.</p>	<p>The management strategies for late season mule deer hunting in Region 2 are very conservative and the Department's recommendations reflect that. The vulnerability of mule deer on winter range and the detrimental effects of extensive disturbance during that time period are string reasons not to expand late season hunting in those units.</p>
<p>Add more bow hunter opportunity in the late deer season within the 200 GMU's, to alleviate overcrowding within the Swakane GMU, preferably ALTA GMU 242 or Chiliwist GMU 239 for Mule deer or Whitetail.</p>	<p>The management strategies for late season mule deer hunting in Region 2 are very conservative and the Department's recommendations reflect that. The vulnerability of mule deer on winter range and the detrimental effects of extensive disturbance during that time period are string reasons not to expand late season hunting in those units.</p>
<p>Thank you for reducing seasons to allow the herds to build in the NE and for trying the 4 pt rule in 117 & 121.</p>	<p>Thanks for your comment.</p>
<p>If there was a Unit or 2 that was Muzzleloader only and I mean Traditional Muzzleloader (No In lines). (Flintlock only) And these units had Shelter Camps for camping in a semi primitive way. Other facilities provided as possible for toilet and water. I would pay extra or for the opportunity to draw a tag in a Unit like this. I would get together with likeminded hunters and we would camp and hunt together. We like Walk-in camps not too far from parking but far enough to be out of sight of our trucks. I believe that with such camps and traditional hunts we could increase the harvest by Muzzleloaders. Why should we pay some outfitter to set us up on state land when the WDFW could be gaining revenue? My experience is that Muzzleloaders that hunt traditionally do not leave a mess behind. Besides if it was by permit only, you would know who did not respect our forest. As a member of the Washington State Muzzleloaders and attendee at many of the Rendezvous for Muzzleloaders I believe that you will fill every camp you would establish with a Season Permit. I hope you consider this idea. I am sure if you ran this by the Archers and the Hi Power hunters they will not like the idea unless you did the same for them.</p>	<p>What you're suggesting is a lot more elaborate than establishing the time, place, and manner that a deer can be harvested. The Department does not have the resources to establish what you are suggesting. Additionally no matter where you tried to establish such a unit, you would always be displacing other users (modern firearm, archery, hunters with disabilities, muzzleloaders that use less traditional equipment) that have used that location historically. It wouldn't be fair to displace all the others, especially on public lands, for one narrowly focused group.</p>
<p>Pertaining to Unit 105 In the past this unit has offered a unique opportunity that is a rather rare general season hunting experience. During a selected time of December the turkey season, archery white-tailed deer, and archery elk season overlapped. During this particular overlap the season was open for either sex for all three games species. My hunting partners and I have thoroughly enjoyed this cold and snowy weather opportunity. However, the proposed rule changes would separate the late white-tailed deer season into antlerless and either sex; and the elk season is becoming any bull instead of either sex. It is very rare to have such an opportunity without being drawn for a couple of tags in the same year. It is my recommendation that this unit continue to be either sex for archery white-tailed deer, archery elk, and turkey during at least one weekend of December</p>	<p>The late archery white-tailed deer recommendation has been restored to an either sex opportunity. The late season turkey opportunity hasn't changed. So you will still be able to hunt either sex turkey, either sex white-tailed deer, and bull elk in that time frame in GMU 105. However with our proposal you wouldn't have the antlerless elk opportunity.</p>

COMMENTS	AGENCY RESPONSE
<p>We would like to see the muzzleloader season in GMUs 407 and 410 extended to Dec. 31st same as late archery.</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the District level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>I would like to see the season setting process moved so that the seasons are set in place at least one year before the hunting season is set to start for big game. An example is that the dates for the 2012-2013 season should be set by September 01, 2011. Many people, including some of my hunting partners, need to pick all of their vacations for the year before January. I believe that this is the case with many of the people who have labor intensive jobs. So with the decision to not have the seasons in place yet for 2012-2013 they may not be able to get the time off to spend hunting. Normally, we can look ahead in the 3 year plan but this does not work every few years and we are left to make a guess as to when the season will happen.</p>	<p>Using this approach we would be making recommendations without the latest harvest information and without the latest survey information. Some basic general season dates can be set in advance, which is why, we do things on a three year cycle. But because we are dealing with biological systems and populations of wild animals, we need the flexibility to propose changes on a much shorter time frame than 1 ½ years in advance.</p>
<p>In regards to deer hunting: I think buck hunting seasons should be started after the completion of the major breeding season. I think the deer population would be improved if buck hunting was allowed after they have completed breeding. Doe hunting should be allowed prior to the breeding season only.</p>	<p>Hunting after the breeding season would put a lot of activity in the woods at a time when deer are trying to conserve energy and maintain their resources.</p> <p>It would also be logistically very difficult to provide all of hunting season opportunity to all the different user groups after the breeding has been completed. As you move later into the winter antlered and antlerless deer would become more difficult to distinguish because bucks would start dropping their antlers.</p> <p>And finally, in many locations in Washington, snow conditions would make it very difficult for hunters to access their favorite hunting sites, so there would likely be quite a resistance by deer hunters to this kind of a season.</p>
<p>It is foolish to eliminate the Master Hunter Season for antlerless whitetails in Whitman county (GMU 139 and 142). This short season (9 days) will not harm the take for the "General Hunter," but the timing of the Dec. season for WTD antlerless only is just right to help landowners who need deer taken off the WINTER WHEAT fields. And Colfax in Whitman county has too many whitetails and that is why it is a Special Deer Management unit within Whitman county. If you want to eliminate a December deer season why not in GMU 130 but not in GMU's 139 and 142.</p>	<p>The intent for Master Hunters is to address specific damage situations. A general season hunt spread over several units does not appear to meet that intent. The Department is attempting to ensure that Master Hunters are not perceived as being in competition for opportunity with general hunters. In this case, we are recommending dropping the December MH hunt for antlerless deer and adding second deer permits for general season hunters in GMUs 139 & 142.</p>
<p>As a Master Hunter I do not agree with some of the proposed changes to the incentive hunts/seasons. To start the GMUs 130-142 antlerless whitetail hunt seems that at least addressing the areas that have the highest amount of damage and or the most sensitive, due to safety and landowner relations would be acceptable. Verses eliminating MH participation altogether.</p>	<p>In addition to the hunts listed above for general season hunters, we are developing a list of 20 Master Hunter permit holders in south Region 1 who would be available on-call when a landowner needs help with a deer problem.</p>

COMMENTS	AGENCY RESPONSE
<p>Removing the Master Hunter white-tailed deer general season antlerless hunt in GMU's 130-142 is a mistake for several reasons: First, this hunt provides a critical service by improving public perception of the department and the hunting public which in turn increases private land hunting opportunities throughout the year. Secondly, public safety is a concern because the rolling terrain and open countryside makes these areas vulnerable to hunting accidents caused by bullet trajectory, lack of obstructions and prevalence of commonly concealed outbuildings and habitations. Third, White-tailed deer populations in these GMU's still appear high and the ability of whitetail to exploit these agricultural habitats and be extremely productive is well documented in literature.</p>	<p>Please see the responses above that address your comments. There are also archery, muzzleloader, and modern firearm general seasons and permits in all of these areas in addition to the Master Hunters season currently which should also address your concerns.</p>
<p>Last year I requested moving the late archery hunting from December to September (antlerless). One of the reasons is a lot of youth want to hunt with family and they're only getting six days in the cold weather. The hunt is discouraging youth hunters. Also, it is not promoting disabled hunters. It is difficult enough to hunt in 117 and 121 with the 4 pt. rule. It would also help balance the buck ratio. September is a good opportunity to take does that don't have fawns.</p> <p>Late quality special permits in 117 and 121 allow any white-tailed so this may be a typo. As archery and muzzleloader hunters, we would also appreciate opening up those units to all weapon types.</p>	<p>This proposed change would have to be vetted with all of the hunting public. It is likely that the people that currently hunt the late archery season and prefer it in its current form would not be very supportive of this proposal. However, the Allocation Subcommittee of the Game Management Advisory Council will be meeting in a couple of months, and the Department will share your proposal with the Subcommittee.</p>
<p>I oppose the elimination of the late white-tailed deer, master hunter hunt in 127 to 142. I disagree that the hunt is not consistent with master hunter objectives. It improves landowner relations and expands access to private lands. Several master hunters forego hunting during the antlered season to hunt the late hunt just to do public relations. We go to different places each year. Knock on doors, in December, meet landowners, mend fences, work our magic, hear horror stories (about hunters), trying to further the image and improve relations for hunters. Try to explain that that isn't how good ethical hunters behave.</p> <p>I think it is short-sighted, just to sell a few more special permit applications. Please consider an alternative to what is being proposed.</p>	<p>We will have to agree to disagree on some of the points of this topic. The Department feels the Master Hunter white-tailed, antlerless, hunts in GMUs 130-142 are not consistent with the Master Hunter objective.</p> <p>The late archery general season (Nov. 25-Dec. 15), the late muzzleloader general season (Nov. 25-Dec. 8) and special permits (some of which are Master Hunter special permits) will meet the white-tailed deer antlerless removal needs for these GMUs for the near future.</p>

COMMENTS	AGENCY RESPONSE
<p>When the 4 pt. restriction was put into effect in GMUs 117 and 121, it shouldn't have applied to youth and disabled hunters. I think you can open that up and provide more opportunity to the youth and disabled. I think you can move the antlerless archery opportunity for the youth and disabled from December to September to give them more opportunity. I don't think you would kill too many does. Having the opportunity is more important than killing the deer. I support allowing all weapon groups to apply for the quality permits in there.</p>	<p>Some members of the public have suggested an alternative similar to the one you've proposed, but the Department is not recommending such a season. Having a variety of different restrictions for different user groups during the same time period makes it extremely difficult to assess how a season structure might be functioning.</p> <p>Your proposed change would have to be vetted with all of the hunting public. It is likely that the people that currently hunt the late archery season and prefer it in its current form would not be very supportive of this proposal. However, the Allocation Subcommittee of the Game Management Advisory Council will be meeting in a couple of months, and the Department will share your proposal with the Subcommittee.</p>

WAC 232-28-358 2012-2014 Elk general seasons and definitions.

A. Agency reason for adoption: This rule provides recreational elk hunting opportunity, protects elk from overharvest, and helps address elk damage problems through the establishment of 2012-2014 general elk seasons.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Under modern firearm, archery and muzzleloader modify the footnote that pertains to Elk Area 3911 to read as follows:

**** Master Hunters who hunt in Elk Area 3911 may purchase a master hunter, Elk Area 3911, second elk transport tag. Only one (1) antlerless elk may be taken from Elk Area 3911 unless drawn for an antlerless elk special permit. Any legal weapon may be used. Master hunter, Elk Area 3911 second elk transport tags will be valid only for Elk Area 3911 from August 1- October 26, 2012, August 1-October 25, 2013, and August 1- October 24,2014. All hunters participating in the Elk Area 3911 hunt must wear hunter orange.**

This change more specifically spells out the recommended rules and restrictions that will apply to Master Hunters participating in this hunt.

- Under modern firearm, eastern Washington:
 - Restore the Dec. 9-31, Master Hunter only hunt in GMUs 127 and 130, but for antlerless elk only. The original recommendation was to eliminate this hunt entirely, but after receiving input from the Master Hunters the recommendation was changed. The antlerless only hunts recommended are more in keeping with the intent of the Master Hunter program and dealing with damage issues.
- Under late archery general seasons:
 - For GMUs 101, 105, 108, 117, 121, 204, 124, 127, 373, and 388, change the date to a standardized start date of Nov. 25. This provides a predictable start and end date for this season. The change also eliminates an overlap between archery and modern firearm special permit hunts.
 - For Master Hunters only, Elk Area 3911, antlerless only, change the dates to Nov. 10-Dec. 16 for 2012; Nov. 9-Dec. 15 for 2013; and Nov. 8-Dec. 14 for 2014. This change

corrects a typographical error and makes the season consistent with the modern firearm and muzzleloader seasons, as well as continuing the approach used last year.

- Under late muzzleloader general seasons:
 - Shift GMU 204 out of the “any elk” season and move it to the “any bull” season. This change corrects a typographical error and is consistent with the changes made in GMU 204 for modern firearm and archery.
 - For Master Hunters only, Elk Area 3911, antlerless only, change the dates to Nov. 10-Dec. 16 for 2012; Nov. 9-Dec. 15 for 2013; and Nov. 8-Dec. 14 for 2014. This change corrects a typographical error and makes the season consistent with the modern firearm and archery seasons, as well as continuing the approach used last year.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>By now you may have heard that the floating starting date for the early archery elk season is not popular among many of us it affects. This is for a variety of reasons and they are the very same reasons that were cited when we lobbied for and succeeded in getting the season dates set at September 8-21 in the first place: 1) competition with holiday campers for campsites, 2) private land gate closures due to fire danger when it is hot and dry, 3) increased risk of meat spoilage when temperatures are high, and 4) other western states allow archery hunting in the latter part of September and their herds haven't suffered. Let those of you who were around when the September 8-21 dates were first established remember, and those of you who are newer to the commission understand, the Department's position back then. We had been told that hunting in the last half of September "will never happen". But after the Commission said "Let's try it and see", and after the September 8-21 dates had been in place for a few seasons, our success rate for the first time ever matched our user group size ratio. The data that was shared with us showed that on the East-side where the opportunity to harvest older bulls is tightly controlled by permit all of the user groups took their correct proportion of "mature" bulls in spite of the season timing; it was a success! I believe it was the inclusion of westside bull harvest that made the statewide "mature" bull harvest by archers appear to be too heavy. Several factors influence West-side harvest of bulls: Dense West-side vegetation makes hunting with long range weapons more difficult but is very conducive to hunting with a close-range weapon. Antler point restrictions of four-point minimum in some GMU's makes the West-side the only good non-draw opportunity for hunting an older bull in the state and so experienced hunters who choose to limit themselves to only hunting a mature bull will gravitate to the West-side (if not another state). And when all that can be harvested is a bull of at least four-points it stands to reason that much of the harvest will consist of five-points-or-better bulls.</p> <p>Please, let us get all those rag-horns out of the data, and by doing so follow the department's own Game Management Plan definition of a mature bull (at least four and a half years old, generally having six points or more on one side), so that we can know whether there truly was any real justification for implementing a floating start date for the early archery elk season; and if there wasn't let's change it back to the way it was and restore the successful balance to the harvest of elk.</p>	<p>Early archery hunting season dates were the most commented on topic for the 3-year package.</p> <p>For the last three-year package 2009-2011, the Department believed the number of mature bulls being taken by archers as compared to other user groups was disproportionate. So in the last three-year package two changes were made. One was to create a very small number of prime time special permits for modern firearm hunters in the last week of September ending before the beginning of muzzleloader deer season. The other was to move archery general seasons to start the Tuesday after Labor Day. Because this date floats with the changing calendar, the start date does sometimes start early in September. Initially the proposal was to return early archery seasons to the Sept. 1-15 time period. But that was unacceptable to archery representatives, so the negotiated compromise was to start the Tuesday after Labor Day.</p> <p>With the creation of the multiple categories special permit system in 2010, the concept of quality special permits was expanded to all user groups within the limits of available calendar dates.</p> <p>Disproportionate mature bull archery harvest in western Washington was the issue in the last three-year package. It was disproportionate whether we looked at five point or better or six point or better bulls.</p> <p>Success rates for eastern Washington early archery branch-antlered bull permits have been consistent by hunt regardless of start dates. This is largely because bull permits are allocated by a formula that considers the user group's proportion of all hunters and their success rate.</p> <p>There are no 4 pt. minimum antler restrictions for elk in western Washington. The units in western Washington that have antler restrictions are 3 pt. minimum units. The Department is not considering a 4pt. minimum antler restriction for elk in western Washington nor have we received many requests from the public to do so.</p>

COMMENTS	AGENCY RESPONSE
<p>BY the WDFW continually moving the archery season closer to the beginning of September the latter becomes more impossible to do with temperatures in the mid 80s to low 90s. Even with a perfect shot, losing meat is almost impossible to do. This is unethical in my eyes and should be in the eyes of the WDFW. Why is archery the only hunt group that there season never opens on a set Saturday as do modern firearms and muzzleloader? By the end of this next cycle archery will be opening on Labor Day which means more people in the hills that may not care to have their children witness the killing and gutting of an elk. There should be no issue with making the archery opener on the Saturday following Labor Day.</p> <p>My second issue is with the way the antlerless permits were divided up between user groups in GMU 328 and 329. WDFW has proposed 40 permits to modern firearms, 20 to muzzleloaders and zero special permits to archery. In order for the WDFW to balance this they have proposed to open late archery season to an antlerless or true spike season. Sounds like a great deal to archers only one thing. WDFW will be putting archery hunters into harm's way because we will need to be down where the master hunters will be hunting due to the weather being too bad for the animals to be in the regular ground. The elk if you look at your tracking collars information will prove to WDFW that the animals will be in or headed for winter ground at the end of November early December. I spend enough time as a master hunter in the BMGR meetings held in Ellensburg to know this. I brought this up to an employee of the WDFW at the Yakima sportsman show and he intern validated this by telling me that we would be able to get to elk in the first creek area which is in the master hunter area.</p> <p>Thank you for allowing us to put in our input and I hope you change your thinking about these issues. I will be at the meetings in Moses Lake on March 9th and 10th to make public comment.</p>	<p>Warm weather can be an issue throughout the entire month of September and into early October. Weather impacts every aspect of hunting regardless of the month. Hunters need to plan accordingly. The real issue is hunters wanting to be hunting closer to the breeding season when bulls are more vulnerable.</p> <p>If we continue with this system of opening the Tuesday after Labor Day, the opener in 2015 will be Sept. 8, the opener in 2016 will be Sept. 6, and for 2017 it will be Sept. 5.</p> <p>The Department offers a wide variety of hunting seasons. Some of them open on Saturdays and close in Sundays but many do not.</p> <p>In regards to the second issue, Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC. Very little of GMU 328 is included in the Elk Area 3911 where Master Hunters may hunt.</p>
<p>I specifically object to four main areas.</p> <p>The Archery Coalition of Washington (made up of board members from the WSAA, WSB and the TBW) wrote to you previously on these same issues and I am writing to you to show my support of their position.</p> <p>The issues are: 1. Change the early archery elk season back to a fixed time frame of September 8th to the 21st as it was prior to the 2009-2011 seasons and add our 1 day back that was taken away in 2009. Archery is a hard sport and one that does not need further handicaps. By limiting us to 13 days afield and starting as early as September 2nd (2014) makes a difficult sport much, much harder. We are forced to compete with the Labor Day hiking/camping crowd plus deal with potential fire closures that most frequently happen during the first week of September. For example, last year the private timber companies shut down their land during the first week of archery elk season and it started on the 6th. Imagine how many days we would have lost if the season started on the 2nd! In addition, compared to most other western states (Idaho, Oregon, & Montana) our archery elk season is only half as long (13 vs. 30 days). Another fact to</p>	<p>For the last three-year package 2009-2011, the Department believed the number of mature bulls being taken by archers as compared to other user groups was disproportionate. So in the last three-year package two changes were made. One was to create a very small number of prime time special permits for modern firearm hunters in the last week of September ending before the beginning of muzzleloader deer season. The other was to move archery general seasons to start the Tuesday after Labor Day. Because this date floats with the changing calendar, the start date does sometimes start early in September. Initially the proposal was to return early archery seasons to the Sept. 1-15 time period. But that was unacceptable to archery representatives on the GMAC, so the negotiated compromise was to start the Tuesday after Labor Day.</p> <p>With the creation of the multiple categories special permit system in 2010, the concept of quality special permits was expanded to all user groups within the limits of available calendar dates.</p> <p>Disproportionate mature bull archery harvest in western</p>

COMMENTS	AGENCY RESPONSE
<p>consider is that the current proposed modern firearm season for western Washington elk season is 12 days, only 1 day shorter! I strongly urge you to please reconsider and reestablish the fixed season of September 8th to the 21st. Change the early archery elk hunt in the Bumping GMU 356 from spike only to antlerless and spike, as calf recruitment is back at department goals. The decision to change this from spike or antlerless to spike only was made prior to the 2010 season (after the 2009-2011 seasons were set) and was made without public input on the issue. The department also continued to offer cow permits to the modern firearm and muzzleloader groups during the 2010 and 2011 seasons while no permits were offered to the archery user group. Further, cow permits are once again being offered to these user groups in the current proposal while archery is recommended to once again be spike only. I have hunted this unit since 2002 for early archery elk and my anecdotal experience is that the elk population has been very stable in the unit specifically in the William O'Douglas Wilderness area of the unit. I strongly urge you to change the early archery elk season in GMU 356 back to spike or antlerless.</p> <p>Add a late Archery elk hunt in the Quilomene for antlerless/spike. Thank you very much for taking the time to read this letter and for the work you do for our state. However, I strongly urge you to consider making these changes prior to approving the next three year package. We as bowhunters are not asking for much, but rather a return to what we had as a user group as recently as 2008. The 2006 to 2008 seasons were much more equitable between all user groups than this current proposal. I am a life resident of Washington State, I am currently 32 years old and I have been hunting since I could walk. As soon as I could legally be afield with my own license I was and I have been bow hunting from day one. I love this sport and this state and I am only asking that we get an equitable piece of the pie. I look forward to hearing your response and witnessing your action.</p>	<p>Washington was the issue in the last three-year package. Success rates for eastern Washington early archery branch-antlered bull permits have been consistent by hunt regardless of start dates.</p> <p>The proposal does include a 12 day modern firearm season in western Washington. But there is no late modern firearm season. Late archery season in all units that are open lasts for 25 days in 2012.</p> <p>Warm weather and fire danger can be an issue throughout the entire month of September and into early October. Weather impacts every aspect of hunting regardless of the month. Hunters need to plan accordingly. The real issue is hunters wanting to be hunting closer to the breeding season when bulls are more vulnerable.</p> <p>If we continue with this system of opening the Tuesday after Labor Day, the opener in 2015 will be Sept. 8, the opener in 2016 will be Sept. 6, and for 2017 it will be Sept. 5.</p> <p>Fifty (50) antlerless special permits are being proposed for archers in GMU 356 this year. For modern firearm and muzzleloader the antlerless permits in this unit are 25 and 30 respectively. Region 3 staff will meet with archery representatives for the 2013 season to determine how additional antlerless opportunity will be proposed if the elk population trends continue.</p> <p>There are 50 antlerless permits for archers that are being proposed in GMUs 328 and 329 (Quilomene) and a late archery general opportunity for true spikes and antlerless in 328, 334, and 335 but the Department is not currently recommending any general season late opportunity in Quilomene.</p>
<p>I don't feel it is fair to have a 4 day season you have been shorting it for years now and now you make it 3 point only and 4 days it is ridiculous' to soy the less. This is for unit 574 late muzzle'</p>	<p>In the last three years and the coming three years for GMUs 568, 574 and 578, the late muzzleloader season shifts with the calendar and the Thanksgiving holiday. The opener is the Wednesday before Thanksgiving and the closer is always Nov. 30.</p>
<p>For elk hunting season is there any way that there could be more units opened up for muzzle loaders to hunt like 572, 560, more late season hunts would be great thanks for taking the time to look this over have a great day.</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>I have always believed that our license fees were for insuring growth of herds and opportunity to hunt game and provide food for our families. You have got to be kidding us, we currently only have an 8 day Bull only season. The Projected 2013 season is only 4 days long? It is not worth setting up Elk camp for what is a weekend hunt. Hunters will just not</p>	<p>In the last three years and the coming three years for GMUs 568, 574 and 578, the late muzzleloader season shifts with the calendar and the Thanksgiving holiday. The opener is the Wednesday before Thanksgiving and the closer is always Nov. 30.</p>

COMMENTS	AGENCY RESPONSE
<p>show up for so little hunting opportunity. We have been cut down from a 21 day Elk season in the past and with the bull only requirement our success rate has dropped to almost nothing, we should be getting more days of hunting, not less. In years past in unit 574 the harvest numbers for Modern fire arm have been really high, but there has been little done to equally change rules for all. Instead we have seen muzzle loading days diminish. I have a young son who relies upon the game meat due to food allergies. If you continue to set hunting rules that hinder the harvest of animals for human consumption I will choose my family over your regulations.</p>	
<p>(For 574 muzzleloader)... I hear it is proposed to drop the season to four days. You have already destroyed this great hunted that has existed for about two decades. With the change to a bull only in this area the success rate is nearly zero. The few that happen to draw a cow tag have the only realistic chance of success. If you don't draw a cow tag you are likely just donating the funds of the elk tag to a near zero chance elk hunt.</p> <p>On top of this, if you go to only four days it is not worth the fuel or time to go to the area to hunt. If you haven't noticed a very large number of people already quit muzzleloader elk hunting and went back to modern rifle season.</p>	<p>In the last three years and the coming three years for GMUs 568, 574 and 578, the late muzzleloader season shifts with the calendar and the Thanksgiving holiday. The opener is the Wednesday before Thanksgiving and the closer is always Nov. 30.</p>
<p>Recommend same amount of hunting days for late Archery Elk both eastern and western Washington. Modern firearm and muzzle loaders loose 1-2 days where as Archery loses 5-6 days FOR 2013 AND 2014 THIS IS NOT FAIR TO CHANGE ONE GROUP AND NOT ALL EQUALLY.</p>	<p>The Department offers a wide variety of hunting seasons. Some of them open on Saturdays and close in Sundays but many do not.</p> <p>Some of the hunts shift with calendar dates and are also tied to holidays. We have proposed some shifts in starting dates that would provide predictable and consistent dates year after year rather than shifting with calendar adjustments. Hope it helps.</p>
<p>I see antlerless permits for GMU 328, for EF (40) and EM (30) on the website. Nothing for EA.</p> <p>Are there any antlerless permits for early archery (4-16th.sept.) in GMU 328?</p> <p>I know that you want bull to cow at 1-10. If bull permits were increased by 2 -4 permits in 328, is NOT going to decimate the herd. I live in 328. I see what is in the Nanuem herd year around.</p> <p>Now if the game department put up a 1/2 mile zone around the Colockum game reserve with a few permits, that only permit holders can hunt, that would help to eliminate some of the problems by the reserve. LIKE a hunter behind every tree or fencepost. That is what ethical hunters call B.S. It would help the elk in that area</p> <p>Please respond.</p>	<p>Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC.</p>
<p>Fewer restrictions might retain and add hunters to hunting license purchases. I'm just wondering does the DFW make up for the lost revenue in license purchases through the permit revenue? It would appear so, because we keep getting more restrictions through permits and not considering the hunters dropping out. Something to think about when your adding more restrictions, (I'm guessing from hunters success reports). That when there were more hunters and less</p>	<p>The Department only proposes restrictions that we feel are necessary. The sale of elk licenses has increased over the past twenty years and we now sell more than at any time we have been tracking them.</p> <p>The data collected through mandatory reporting is critical to better managing the hunted populations. Having that knowledge often allows us to recommend more opportunity.</p>

COMMENTS	AGENCY RESPONSE
<p>restrictions no mandatory reporting, over 10 years ago and further back, that the elk herds weren't decimated to a point of all these restricted permits. I think the newest restrictions are going to be on the GMU's above Spokane because 2010 reports were around 500 elk harvested.</p>	<p>The restrictions we are proposing for NE elk are intended to create more opportunity for the long term.</p>
<p>Make an any weapon and side east/west tag. Just raise the price of that tag. This way everyone wins. There is a good point to be made, when you hunt bow season and don't get an elk or deer. Then the season is still going on. Then you cannot buy a gun tag. There is also a good point in the limited area you can hunt. East or West side the state is not that big really. Alaska doesn't even have a regulation like this. It is has 3 mountain ranges and is a 1/4 the size of the united states. Their regs are one tag any weapon and anywhere in the state; just one tag per hunter. It is possible to add the price of what it would cost to buy a gun, bow, east, and west side and combine the price and lower it 25%. It is still only one elk and deer. But this tag will come with options which I think most hunters would like to see. You can keep the same tags on the billet and just add one. This way the die-hards for just bow or gun can get a cheaper tag. But truly hunting should be state wide. I understand the management thing but I think an open tag at a raised price. Would possible bring in more money to the state conservation. Make hunters happy with options. I don't think there would be a problem with a raised price. If you keep the old tags available. Some will complain about the state wide thing. But I think they just don't want you hunting in their area. It's still only one Elk and deer per hunter. I do not know about the herds with an any sex tag. But if the herds look good maybe it's an option. Really most working people can only hunt on the week end. So they won't travel very far from home. So I think only about 25% of the hunter out there know will travel from east to west. But I would still like the option to and free will. But I do think 75% of the hunter would buy an any weapon tag even at a raised price. Thank you for your time and thanks for allowing the citizens to voice their opinion about the regulations</p>	<p>The multiple season permits already provide what you are requesting. You have until March 31 to apply for Multiple season permits.</p>
<p>Just wanted to add, seeing were the meetings a being held I think that Everett should be added to the list. I've hunted in this state for a long time and each year the archers take it in the shorts. We need to change this back to where we had a chance. I hunt in GM unit 328 and think this true spike only has to go</p>	<p>Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC.</p>
<p>I have a comment on the proposed 2012 cow elk allocation for the 328 area. Specifically for archery hunters. It makes little sense to allow cow tags only in the late archery season, even though it is an unlimited number. I have hunted this area for 30 years or more, early and late seasons. I have harvested 1 cow in the late season in this period. In many cases the elk have already migrated east and are totally out of the area. If they are in the area, they are down low in the sage areas. Anyone that is a serious archery hunter knows that it is almost impossible to get within 30 or 40 yards of an elk in open country for an effective ethical shot. Looking at past years hunter success reports shows that</p>	<p>Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC.</p>

COMMENTS	AGENCY RESPONSE
<p>archers had a success rate of about 15 percent, when cows were allowed to be harvested in the early season. The percentage has dwindled now that it is a true spike area. It doesn't make sense to me to allow a given number of cow tags for rifle and muzzle loaders that will have a success rate of over 80 percent , and yet allow cow tags only in the late season when very few will even be accessible to harvest. Why not allow a number of permits for archery in the early season that would allow a comparable harvest to the other user groups?</p> <p>I know this is not an easy task to satisfy all user groups and I appreciate your efforts. I hope you might consider any thoughts that I may have.</p>	
<p>If you give the west side one extra day, you should give the east side an extra day for elk hunting. They should not be a west or east side, we are all Washington residents...and should be able to hunt either west or east without buying a east tag or west tag</p>	<p>The history of the east side west side designations for elk tags is rooted in the need to reduce hunter crowding. As for the department's response to the east/west designation as it relates to applying for special permits, see the elk special permit comment-response document.</p>
<p>I am a western Washington bow-hunter. My passion is elk hunting during the rut. As a bow-hunter I realize the challenge it is to take an elk with archery equipment. I have been unsuccessful several times. My suggestion is that in the 3 point minimum or antlerless, and the 3 point minimum units, the antler restriction should change to 5 point minimum respectively. I think antlerless animals should still be able to be taken, but I think the rut hunt could be improved while more cows get bred. With a 5 point minimum the competition to breed cows would increase, and there would be much more escapement for bulls that are mature enough to breed. Hunters would experience better calling opportunities as well because there would be more satellite bulls instead of there being one herd bull that was a spike in the previous year. It would only take a couple of years before the likelihood of killing a 5 point was as good as killing a 3 point, and I believe a healthier elk herd would be the result.</p>	<p>Your suggestion would be a very restrictive rule change that most elk hunters would not be in support. The Department does not see the need for such a restrictive rule, reduction in harvest, and reduction in opportunity at this time.</p>
<p>I'm an avid archery hunter that currently hunts the southwestern portion of Washington state. I'm writing in regards to the proposed season changes for early westside archery elk. As you may or may not be aware, archery season has been based around the idea of hunting during the rut. For a variety of reasons, it appears the rut has been occurring later in the month of Sept. /early Oct. In the past four to five seasons due to the short length of Washington's archery season and a variety of factors, the rut in essence has barely been in "swing" during season. This lack of rutting has made archery hunting more difficult to say the least. Big bulls bugling in the Washington timber is why I hunt archery elk, it's why my father hunts archery elk, and why the other four individuals in our camp hunt archery elk. This proposed change would move the season even farther away from potential/ historical rut dates. This is NOT an acceptable season change. Please do not follow through with the proposed change. LEAVE the season dates as they are/ or move them back to the latter part of September/ or extend the archery season. This proposed change has brought up much</p>	<p>The details of your request are provided in the first three responses of this document.</p>

COMMENTS	AGENCY RESPONSE
<p>debate by six die hard archery hunters. If this change was to pass through and it becomes effective, it's been agreed unilaterally that all members of our hunting party will NOT be purchasing Washington licenses and will be taking our money and time and investing it in either Oregon or Idaho. This will further reduce revenue for the already "depleted funds" and budget faced in these hard economic times. Please do not change the season dates for archery elk.</p>	
<p>Please do not have Muzzleloader elk end the day before modern deer in eastern WA. We liked it better with a week or at least a few days between these hunts. I am a Master Hunter and my party hunts the elk season and then moves to Twisp for the deer season. There is no down time between these hunts as there has been in the past.</p>	<p>There are so many requests by the user groups to have more time to hunt that the calendar in most years is filled. There is little room to shift or provide week long gaps as you request.</p>
<p>Archery Elk Seasons - set it back to the 2009 dates and make the dates fixed. Sept. 8-21. There is no need to have the season keep moving away from the rut. With less rut activity and hotter weather, this really works to limit your chances of success. Muzzleloader Elk Season - these dates should be fixed also. October 1-7 was fine. The department only gives muzzleloaders 1 weekend anyhow (which is BS since all late seasons hunts are absolute garbage, at least on the East side) so what does it matter if the weekend falls in the middle of the season? These two issues are what I have noticed so far. I'm not sure what the department's reasoning is for having unfixed dates but it is getting old. We wait years and years to finally get a good season and then it bumps back up (Muzzleloader) or down (Archery) and gets worse all over again. It doesn't make any sense. Please consider adjusting these season dates.</p>	<p>The details of your first request are provided in the first three responses of this document. Like most hunters, muzzleloaders prefer their opening day to be a Saturday. Although we can't always accommodate a Saturday opener, in this case we can.</p>
<p>I moved here to WA eight years ago. I have archery hunted for elk all but one year and cannot understand why the commission keeps moving the season back for archery as well as the removal of one day from the length of the season during that time. WA is the only western state that does not allow the archery season to go until later into September when archery hunters actually might have a chance to hunt during some prime rutting time. Archery hunters have the most difficult hunt (even if it's during the rut) then either MF or ML as their weapons can reach out well beyond that of a bow. The MF hunters are getting more days and now have permit hunts during the prime late September rut period. ML hunters are now getting their season moved further back INTO the prime rutting period of early October. There is absolutely no reason why the Archery season could not start on the 8th or 10th even and run until the 21st or 23rd (preferably). It would not increase the harvest of elk anywhere near what the changes to the ML and MF seasons will !!!</p>	<p>The details of your request are provided in the first three responses of this document. Modern firearm hunters on the west side get 12 days; archers get 13 in the early seasons. There are no late seasons for modern firearm elk but there are many units open for lat archery. Muzzleloader seasons shift with the first Saturday of October and that will vary from year to year.</p>

COMMENTS	AGENCY RESPONSE
<p>These changes obviously have nothing to do with the amount of elk harvested.</p> <p>Can you please explain what the reasons are for moving the archery seasons?</p> <p>Can you explain the reasons why we are the only state that does not allow archery season to go later into September (like all the other states)?</p>	
<p>I really would like to see a late rut season or a special tag given out for the 121 unit for muzzleloader season. A 9 day season would be really nice.</p>	<p>The early muzzleloader, general season opens on the first Saturday of October and runs for 7 days including in GMU 121. There is still rut activity taking place at this time in most years.</p>
<p>I was just reviewing the proposed early archery elk seasons and noticed the dates are really early this upcoming cycle. It appears that the season is starting following the Labor day weekend which was later the last few years. I spent the last two early seasons hunting elk in Montana and didn't notice that in 08 and 09 the date moved earlier each of those years. I would prefer to see the start of this season on a set date of Sept 8-21 like it used to be before the last 3 year cycle. I know that with budget cuts there are not supposed to be major rule changes but this would be just a change in start date, it would be in line with what the 06-09 seasons were and close to this last cycle dates.</p>	<p>That is correct the early archery opener is the Tuesday after Labor Day.</p> <p>The details of your request are provided in the first three responses of this document.</p>
<p>My input is on modern rifle general season have it start on Thursday instead of ending on Tuesday.</p> <p>Make the special hunts by permit more attractive by adding more tags; the way it looks now is like you are just trying to get more money.</p>	<p>The Department tries to recommend as much opportunity as possible without having a negative impact on the elk populations.</p>
<p>-Early Archery season keeps getting moved closer to the first of the month, I propose starting the season at least 4 to 7 days later, the woods are closed usually during the first part of Sept for fire danger and the bulls aren't usually actively rutting yet. This gives us a disadvantage. OR add 4- 7 days to the season, so we can actually hunt vocal bulls!</p> <p>-Make late archery season units 520 and 530 include 3 pt. bulls or cows</p>	<p>The details of your first request are provided in the first three responses of this document.</p> <p>We are trying to achieve more antlerless harvest in GMUs 520 and 530 so the bull opportunity is being offered in the early season when bulls are also more vulnerable.</p>
<p>I would like to make a comment on a closing date conflict with the forest service gate.</p> <p>The forest service locks and closes the Evans Creek gate on Dec 15 at 12:01 am. You cannot hunt in Evans Creek ORV, but you can use it for access.</p> <p>That area late Muzzleloader GMU 654 has a closing date of Dec 15 at sunset. That is 12 hrs after the gate is locked. Why can't they close it at the same time as the closing date?</p> <p>This robs us of one day access of a very limited muzzleloader area to begin with.</p> <p>I spoke to Forest service "user meetings" twice in over a two years period with no help. His reply was we have a hunting biologist that is suppose to take care of that.</p> <p>By closing that gate 24hr or even 12hr later isn't going to cause anymore expense or trouble in their part that I can think of. I'll even volunteer to lock it.</p>	<p>The Department is having Region 6 staff look into this matter.</p>
<p>I believe the elk season should be extended 1 day. For me it makes sense because I only hunt deer during the western late buck season which occurs after elk season. I hunt the western elk season and late buck in the same GMU; for me it makes</p>	<p>Thanks for your support on our proposal.</p>

COMMENTS	AGENCY RESPONSE
<p>it more affordable. If I can take time off from work the second weekend of elk season and continue hunting through the last day of late buck I do not have to make separate trips to and from my hunting area at 3.60 per gallon of fuel while hauling all required supplies. It just makes sense to do. Thank you for proposing this. What makes more sense is just going back to how it was back in the late 1980s and early 1990s when elk season was 2 full weeks with late buck the last 4 days of elk season.</p>	
<p>Thank you for letting me and fellow hunters comment. Hunting for big game in Washington is to say the least very discouraging. Our seasons for Elk way to early it would be nice to go back to a start date in November, like it was when I started to hunt in the 1980's when I was 13. We definitely saw more animals and we enjoyed our time in the woods more. In the last 2 seasons I have seen 4 elk combined in the woods. As for Deer hunting I really don't go much anymore for the same reasons. Elk season for us has just turned into a family vacation where we carry our guns in the woods and hope we just see something. The one thing that we do enjoy most is Turkey hunting which has pretty much replaced our Elk hunting trips and that's due to the season being appropriately set. Sorry to ramble on but it's very discouraging to waste my time and money to support an agency that doesn't look after its supporters and that would be hunters. Two more big game seasons in WA for my family and I then we will be in Idaho where we can hunt and actually be successful.</p>	<p>You didn't indicate whether you hunted elk on the east side or west side but we're assuming east. The reason hunting seasons are earlier on the east side is that our biologists in the eastern Districts determined that hunting later makes elk more accessible and more vulnerable to hunting because they are often moving down in elevation in response to weather events. It became a choice of continuing to offer some level of general season hunting during an earlier time frame or completely shifting to a permit only type of season. Washington hunters have indicated on several occasions that general season elk hunting is an important value that they want to retain so we offer the hunting seasons at the earlier time.</p>
<p>If the changes to the Regulations pertaining to changing legal elk in the 204 GMU, AND cutting the season length in half as is proposed, well then the communities in this area can COUNT ON not getting any business from us, since our group would venture into the 204 for the week after general eastern bull since the 204 was open any elk for a week longer. The East Okanagan unit is not Selkirk, so please leave it alone. I would like to see the 101 left alone also.</p>	<p>The proposed changes are intended to manage for more elk and create more opportunity in the long run. To do that GMUs 101 through 121 and 204 need to be managed consistently.</p>
<p>I would like the Packwood and Lewis River areas opened up for Muzzleloaders... There is no good reason why these two Game Units 516 and 560 aren't open for Muzzleloaders. Thanks!</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>Remember if anyone takes an elk anywhere near where I hunt you don't see the herd the rest of the season. I have only for the last couple of years been confident I would ever get an elk. I started to see cows in my area in GMU 108 but never see them when the season opens. I hunt for meat not for horns and bulls eat horrible most of the time. I'm not for this new rule!</p>	<p>The proposed changes are intended to manage for more elk and create more opportunity in the long run. To do that GMUs 101 through 121 and 204 need to be managed consistently.</p>
<p>The 2013 & 2014 season is only 2 ½ weeks long because Thanksgiving is on the last week of November. In the past you have opened season a week early if this happened, how come not this time? Not sure it will be worth buying a license for. I'm also not a fan of the length of cow season</p>	<p>Many of our late season muzzleloader hunts have floating dates that key off of the Thanksgiving holiday. Typically the average elk hunter is only able to hunt 3 to 5 days so you still might be able to find enough hunting opportunity in 2 ½ weeks.</p>

COMMENTS	AGENCY RESPONSE
<p>should you be lucky enough to draw a tag. Some day the Fish & Game will catch up with the rest of the country and allow the use of scopes. I'm 63 years old and disabled.</p>	<p>The Department is not planning on proposing scopes for muzzleloaders. As a disabled hunter you may qualify to use a scope if you have certain vision restrictions. Check with the Department's ADA coordinator for the details.</p>
<p>Generally speaking, Eastern Washington modern firearm elk hunters appear to get the fewest hunting opportunities and greatest restriction of any group. With this in mind, please ALWAYS consider having the modern firearm elk season, in any EF tag area with spike only restrictions, one week later than is currently planned. You took our season away from us years ago, why not give it back every once in a while. Thank you.</p>	<p>The reason hunting seasons are earlier on the east side is that our biologists in the eastern Districts determined that hunting later makes elk more accessible and more vulnerable to hunting because they are often moving down in elevation in response to weather events. This was translating into a higher harvest than could be sustained over time. It became a choice of continuing to offer some level of general season hunting during an earlier time frame or completely shifting to a permit only type of season. Washington hunters have indicated on several occasions that general season elk hunting is an important value that they want to retain so we offer the hunting seasons at the earlier time.</p>
<p>You currently have dates proposed that include a national holiday (Labor Day). This is a huge mistake! The campgrounds and forests are packed full of citizens that are not there to hunt. Not only is this a safety issue but it reduces the quality of the hunt to those in the field to do so. A better series of dates for 2012 would be Sept 5th – 19th. This is a Wed to Wed plan. I would recommend that you continue this process for the three year period.</p>	<p>That is an interesting proposal for the coming three years, but in 2015 and 2016 you would overlap with the holiday. In 2017 you'd be back to the Tuesday after the holiday. So from our standpoint the proposal lacks the consistency that most hunters prefer.</p>
<p>We have not been able to find out how to report an elk kill in unit 3911. We shot an elk on Dec. 30th last year but could not find where to report that kill. I don't remember how we reported it but would like to know. There is nothing showing that unit when we report on our success. Also I would like to see no change to that season. I see that you're considering a shorter season in unit 3911, there are not many of us that hunt in late Dec. but have enjoyed that last two weeks in Dec. Have also been able to help a couple of ranches that time of year, finding their cattle while hunting. Sometimes they are still trying to locate cows before winter. We saved one rancher many hours this last year because we found a small herd of 12 they could not find. So we were able to give the rancher the location of his cows. We have a group of 14 to 15 guys that help fence the area around Kitittas in April. We have put in many hours for at least 7 different ranches in the last few years.</p>	<p>Hunting activity reporting is done by GMU so you must determine which GMU you hunted in to successfully report.</p> <p>The proposals do include shortening the season to mid-December which is based on the Regional staff's assessment of the need to harvest antlerless animals to mitigate damage.</p>
<p>Elk Season - Area GMU 560 Not open for General Muzzleloader Season, Open only for Special Permits Open for General Archery Season for 3pt or Better/Antlerless and Special Permits Open for General Modern Firearm Season for 3 pt or Better and Special Permits I understand that Muzzleloaders can hunt during the General Modern Season but must have a Modern Tag. This does not allow Muzzleloaders the opportunity to apply for Muzzleloader Permits for GMU 560 or the opportunity to hunt during Muzzleloader Season. Allowing Muzzleloaders a General Season in GMU 560 for 3 pt or better, would allow us the opportunity to hunt in the GMU even if we don't draw</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>

COMMENTS	AGENCY RESPONSE
<p>a Permit for the GMU. This allows us the opportunity to learn and hunt the GMU each year. This enables Muzzleloaders to be become more familiar with the area and improving their hunting experience. Thank You for considering my request.</p>	
<p>Why don't you want archery to harvest bulls? I oppose changing season to early Sept. I'm upset that we can't hunt bulls late season GMU 530\520\506 bout ready to stop hunting WA.</p>	<p>The details are provided in the first three responses of this document. We are trying to achieve more antlerless harvest in GMUs 520, 506, and 530 so the bull opportunity is being offered in the early season when bulls are also more vulnerable.</p>
<p>I'm sure you've heard it already but I have a complaint about the 3 point minimum for elk in the Clearwater area. I'm a rifle hunter and I live in Clearwater. The tribe hunts here year round and pretty much kills whatever is available with no regard for the rest of us. I know you can't do much about that. But you could remove your 3 point min. as it is doesn't seem fair for the licensed hunter and resident who is paying the bill both through license fees and loss of hay crop production to have very little chance of getting an elk. Nor am I interested in conserving for the wolf population or those who pay nothing. If the present management practices are to be continued I think I will not hunt in this state anymore and take my license fees somewhere else. If you have a good solution to the problem I would like to hear it</p>	<p>The 3-pt. min. antler restriction is used consistently throughout western Washington. The restriction provides enough of a level of bull escapement to meet post-hunt bull objectives while still allowing general season hunting.</p>
<p>Why are you trying to eliminate the elk in western Washington? Make bull elk 5pnt or better in western Washington and deer 3 pt. or better just like the eastside, put your books down and get out of your chair and do some real research in the woods. YOU are going to destroy hunting in Washington because you don't know S#@T! And you don't listen to the public!!!!</p>	<p>Your suggestion would be a very restrictive rule change that most elk hunters would not be in support. The Department does not see the need for such a restrictive rule, reduction in harvest, and reduction in opportunity at this time.</p>
<p>I am an avid hunter and have been one for the last 23 years. My father, his friends, and I have hunted in the Wenas, Manashtash areas every year since before I could legally carry a rifle. If I could make one change to the hunting regulations it would be moving the hunting days back to later in the season. As of now it is too warm, and the elk that we are suppose to be hunting have not come down from the upper mountains. Hunting in that area has become increasingly worse every year and any elk that are seen are usually local herd. Moving the hunting seasons back a week or two would allow for better hunting, and a sense that the game department cares about the hunters paying a hundred dollars a hunting season. Thank you for your consideration, I would really like a response to my email if at all possible</p>	<p>The reason hunting seasons are earlier on the east side is that our biologists in the eastern Districts determined that hunting later makes elk more accessible and more vulnerable to hunting because they are often moving down in elevation in response to weather events. It became a choice of continuing to offer some level of general season hunting during an earlier time frame or completely shifting to a permit only type of season. Washington hunters have indicated on several occasions that general season elk hunting is an important value that they want to retain so we offer the hunting seasons at the earlier time.</p>
<p>Thank you for reducing antlerless elk harvest in NE Washington; this will hopefully allow our herds to grow.</p>	<p>Thanks for your support.</p>
<p>Lastly, the idea that for the next several years the general elk season in western WA will be 12 days is ludicrous. We should be shortening the seasons.</p>	<p>After implementation, Department staff will continue to monitor populations. We don't anticipate any problems but time will tell.</p>
<p>Under the proposed 2012-2014 elk hunting seasons, muzzleloader hunters would be allowed to harvest any elk in Game Management Unit 204 during the Late Muzzleloader General Elk Season, while modern firearm and archery</p>	<p>You are right this was a typographical error. Thank you for pointing it out. The error has been corrected in the Recommended Adjustments.</p>

COMMENTS	AGENCY RESPONSE
<p>hunters are restricted to harvesting only bull elk within that same game management unit. I do not know if there was some kind of typo when creating this particular season, but, under the proposed season, Late Muzzleloader General Elk Season hunters are allowed to harvest any elk in GMU's 203 through 248 (which would include GMU 204). If this was some kind of a typo or oversight that happened while creating the new regulations, then I would like to point it out to the rule making committee. However, if it is the department's intent to completely exclude Modern Firearm and Archery elk hunters from being allowed to harvest Cow elk within GMU 204 (while at the same time allowing Muzzleloader hunters to do so) then I would like to voice my opposition to this proposed change to the elk hunting regulations</p>	
<p>I would like to add GMU 652 to the late Archery season as it is available for Muzzleloader but not archery.</p>	<p>The Department is always looking for additional opportunity that can be offered. The Recommendations start at the district level and are then forwarded up to the Regional level. At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>
<p>Regarding the northern herd: If the herd is on the increase then why eliminate the either-sex season? If the goal is to increase the herd faster, then that would make good sense to eliminate the either-sex season.</p>	<p>Yes that is the intention behind the proposed rule change, to allow the herd to grow at a more rapid pace.</p>
<p>I noticed that the late archery elk season in the northeast corner including unit 117 is now any bull. What is the justification in taking away opportunity for archery hunters in the late season? It is hard enough finding elk up there let alone picking out one, trying to stalk it through loud crunchy snow, and now we are forced to shoot bulls only? This is unbelievable. Coupled with the 4 point minimum for deer this is really putting a damper on the late season hunting in the NE corner. Of the 60 antlerless elk harvested in district 1 last year, how many were in the late season archery? Are we expected to believe the herd is being over harvested? I'm all for preserving our game herds in the northeast corner, but what scientific data is there that suggests we even more limitations for archery? Please consider changing this back to normal.</p>	<p>The intention behind the proposed rule change is to allow the herd to grow at a more rapid pace. In the long run this should provide more elk hunting opportunity.</p>
<p>One proposal I would like to suggest: I have witnessed for many years that during modern firearm elk season in the Lewis unit (the old marble unit), that there are numerous mushroom hunters in the same area/woods as rifle hunters I am aware of the reason of the hunter orange requirement and agree with it but what I don't agree with is the fact that the mushroom hunters in the exact same area as a rifle hunter are not required the orange as is a hunter I believe this is a simple rule change that should require any persons in the woods during a rifle season be required to wear orange</p>	<p>That is an interesting safety proposal, however, the Fish and Wildlife Commission only has authority over things like the time, place, and manner in which the elk hunting you described is conducted unless it is on lands owned/managed by WDFW. They do not adopt rules pertaining to mushroom collection.</p>
<p>I strongly feel GMU 673 should be open for late archery season.</p>	<p>GMU 673 is open for early archery for 3 pt. min. and antlerless elk. At this time the Region feels it is</p>

COMMENTS	AGENCY RESPONSE
	recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.
I am against the proposal to add a twelfth day to the modern firearm elk season. I have lobbied for more liberal Westside muzzleloader seasons. You not only have made very few minor improvements in those seasons, but six years ago you added a tenth day, three years ago added an eleventh day and now you want to add another day to the modern firearm elk season. I propose to take the two days you added and the one day you want to add and let the muzzleloader hunters have those three days, and maybe add a couple more and let them hunt in the same areas that are open to the modern firearm hunters. This hunt would be after the modern firearm season. It would go a long way toward trying to make all the user groups more equal in the time everyone gets to hunt. They would also end up shooting fewer bulls than the modern firearm hunters.	<p>You are correct. The addition of days to the west side modern firearm seasons was a commitment that the Department made to modern firearm elk hunters through the Game Management Advisory Council.</p> <p>Adding the 12th and final day for the 2012-2014 three-year package completes that commitment. This ongoing experiment has been to add a day to the season and then monitor the results for three years. Negative impacts were not observed in the first or second three-year time periods so we continued recommending adding an additional day to the season.</p> <p>Staff will continue to monitor populations and harvest for the 2012-2014 time period. It is uncertain whether any additional muzzleloader opportunity for elk can be added after that.</p>
Moving early muzzleloader later into Oct. from the 1st to the 6th makes no sense. Leave it on the 1st. In the 300 hundred units, the number of bulls is at an all time high with the number of large mature bulls making up a huge portion.	Early muzzleloader season starts on the first Saturday of October and runs for 7 days. In 2012 the first Saturday is the 6 th of October.

SUMMARY OF WRITTEN PUBLIC INPUT

WAC 232-28-358 2012 - 2014 Elk General Seasons and Definitions and WAC 232-28-360 2012 Elk Special Permits .

Master Hunter Season Proposals

I support the expanded opportunities for MH and increased involvement of the Master Hunter Advisory Group (MHAG). The benefit of all the volunteer hours outweighs the costs to the agency to manage volunteers. I have recently been appointed to the MHAG.	Welcome to the Advisory Group and thank you for your commitment.
I became a Master Hunter (MH) to cultivate relationships with landowners around the Turnbull Refuge. I have established good relationships and they provide me with access in exchange for the help I give them throughout the year. The landowners I work with don't feel that they have a problem with elk. I don't support the loss of the December Master Hunter season in GMU 130 and don't want to be placed on a list to hunt some property where I may not even know the landowner.	<p>It sounds like you have done a great job of addressing an important part of the Master Hunter (MH) Program which is to improve landowner relationships. Because of the number of comments received in opposition to the proposed change, the Department has modified our recommendation so that it continues the MH December hunt for antlerless elk in GMUs 127 & 130.</p> <p>However, there are also either sex elk seasons beginning in September and running into early December depending on the tag you possess (archery, muzzleloader, or modern). You are encouraged to continue your relationships with landowners and hunt during these time frames as well.</p>

COMMENTS	AGENCY RESPONSE
<p>What is the Department looking for with the MH program? If the incentive hunts are eliminated, many hunters will drop out of the program and the Department will lose out on their volunteer hours. Is the Department trying to phase out the MH program?</p>	<p>The MH program is very important to the Department. What we have found however, is that some hunters were mainly motivated to join the program because of the hunts. We are looking to strengthen the program with hunters more motivated to giving back; retention of our hunting heritage; and improving landowner relations. Therefore the types of incentives used to motivate hunter's to be part of the MH program need to be re-aligned with that philosophy. It was never the intent to trade special hunting opportunities for volunteer work.</p>
<p>I would just like to say giving all the quality elk hunting time around the Turnbull area to Master Hunters is not right or fair to the rest of us. I think some adjustments need to be made.</p>	<p>The main intent of the MH hunts is to address damage problems and landowner concerns. However, we recognize that the harvest of elk by MH around Turnbull includes many bull elk. There are either sex elk seasons for all hunters beginning in September and running into early December depending on the tag you possess (archery, muzzleloader, or modern). Therefore you are encouraged to develop relationships with landowners and hunt during these time frames. The proposed MH general season in this area would run from December 9 to 31.</p>
<p>I have been drawn for MH permits before and never received a call by a hunt coordinator to participate in a hunt. Is this how the ranked lists will work?</p>	<p>The ranked lists will be developed using the permit drawing system. We recognize that many were frustrated with some of the "on-call" hunts in the past and we eliminated those from our recommendation. In addition, we recently modified our recommendation to set what we feel are more realistic with our estimate of how many hunters might be needed to address damage problems within a geographic area. However, it is very important for MH to remember that there is no guarantee and we will only call on hunters once we receive a complaint from a landowner.</p>
<p>Can the Department let MH know their position on the ranked list? How do we know that the hunt coordinator is not just picking their friends to participate in the hunts?</p>	<p>We will look into developing a tool that allows us to provide that information. Hunt coordinators must follow written protocols for selecting hunters from the ranked (permit) list. These protocols were developed by the MHAG and will be posted on the Department's MH website.</p>
<p>The Department has proposed an "unlimited" number of hunters selected for several hunts in the deer and elk MH categories. If very few of these hunters are called to participate, they will be unhappy with the proposed system.</p>	<p>We agree; part of the rationale for these "unlimited" pools was to ensure that most MH's were drawn every year; thereby eliminating the need or use of points in the selection process (it would merely be random each year for all applicants). Many hunters will not understand or agree with the rationale and so we will change our recommendation to estimate the number of permits that we think will be needed or we have eliminated the hunt choice.</p>
<p>Why do I lose my points when selected for a hunt but don't get called and don't get to hunt?</p>	<p>The point system was designed to improve the odds of being drawn for those who applied year after year, but weren't drawn for a permit. That is important for those hunts that are difficult to draw. That is not the case with MH permits (1975 MH certified; 800 elk applicants; 500 permits). If you apply for several permit choices, you will be drawn regularly. Therefore you will not be competing with folks who have a lot of points for very long. This is just a carryover from the change in application categories in 2010. Many have suggested eliminating the use of points for MH categories.</p>

COMMENTS	AGENCY RESPONSE
<p>Why weren't MH more involved with the recommendations for changes to the MH hunts earlier in the process? Communication efforts were poorly executed.</p>	<p>The standard process for public involvement with our hunting season recommendations includes general public scoping, consultation with Advisory Groups, development of options, development of proposals, and then comment and testimony during the formal Commission regulation adoption process. We followed that process with our development of changes to the MH seasons as well. One significant difference is that by Commission policy the MH Advisory Group does not support or oppose agency recommendations for MH hunts. We did involve them in December to help us develop guidelines for hunts. We feel that our original proposals followed those guidelines, but recognize that this was a big change for some folks and needed to be more of a phased approach.</p>
<p>As a landowner and MH, I support keeping the MH December hunt in GMU 127 for antlerless; that is better than closing down the hunt. The ranked list concept is okay as long as it's fair and the same people don't get called all the time to hunt. Landowners who ask for damage complaint hunts and other relief should not receive it unless they open their land to hunters. They also should not be allowed to select the hunters for these damage hunts nor charge a fee.</p>	<p>We appreciate your perspective and your support for our modified proposal to keep GMUs 127 & 130 open for MH in December. The ranked lists will be developed using the permit drawing system. Hunt coordinators will all be using a standard set of procedures for who gets called to participate. We recognize that many were frustrated with some of the "on-call" hunts in the past and we eliminated those from our recommendation. In addition, we recently modified our recommendation to set what we are more realistic with our estimate of how many hunters might be needed to address damage problems within a geographic area. However, it is very important for MH to remember that there is no guarantee and we will only call on hunters once we receive a complaint from a landowner.</p>
<p>The MH hunts requiring a hunt coordinator should be eliminated and those permits should be re-allocated to the three user groups (archers, muzzleloaders, modern firearms). The MH general season hunts should be eliminated because they are either-sex and are not depredation hunts.</p>	<p>The MH hunts requiring a coordinator are the best example of depredation hunts. The permit holder doesn't even get to hunt unless a landowner asks to have someone come out and remove an animal that is causing problems. The Department's recommendation has been changed to reflect antlerless only for the MH general season hunt in December in GMUs 127 & 130.</p>
<p>The decision to remove MH hunter incentive hunts is not the right one. If MH are merely skilled assassins, then you don't need 2000 volunteers to do that. A primary goal should be to increase awareness of ethical hunting behavior. This objective is also stated in WAC 232-12-073. The Department needs to promote this MH program to compel its members to be ambassadors, role models, and mentors. So providing incentive hunts to encourage enrollment in the program will increase hunter awareness and improve ethical behavior.</p>	<p>As mentioned above, we have modified our recommendation to provide an antlerless elk season in GMUs 127 & 130 for MH during the December time frame. While many might agree with your perspective about encouraging ethical behavior, our experience with the program does not indicate that the curriculum necessarily can change someone's core values or behavior. We are attempting to attract a core of hunters that already have high ethical values to model and mentor that standard to others. Everyone is welcome and encouraged to become a MH, but we feel that the primary motivation should be something besides a special hunting opportunity. We will continue to seek the right balance with hunting opportunities for MH.</p>
<p>We support the MH permits for Region 4, but recommend setting permit levels rather than unlimited ranked lists. We have been successfully using the MH program and hunt coordinators to manage the elk population around North Bend. We recommend that this system be expanded to other areas.</p>	<p>Thank you for your support. Our revised recommendation establishes permit levels and eliminates the unlimited pools.</p>

COMMENTS	AGENCY RESPONSE
<p>The Department is phasing out the MH in the area around the Turnbull Refuge and allowing the Colombia Plateau Wildlife group to administer the hunting program. I have been working with landowners to repair fences, cut firewood, and help them hay. In return I get to hunt their property. If we lose the December MH hunt, I will lose out on the relationship that I built up.</p>	<p>It sounds like you are doing a good job promoting hunter/landowner relations. The Columbia Plateau Landowner Hunting Permit (LHP) program proposal for the area near Turnbull is not connected to the MH hunt proposal. The LHP program is designed to increase hunter access on private land and this proposal attempts to do that. We understand that many hunters in the Spokane area went through the MH program to be able to hunt the December hunt. So we modified our proposal to retain the December hunt for antlerless elk in GMUs 127 & 130.</p>
<p>I think you should allow MH to hunt elk on both sides of the state, especially for the 3911 and 3912 hunts.</p>	<p>We have done that quite a bit in the past and only recently began to limit it. We began to make the change because we have been spreading more MH permit hunts across the state so hunters had more opportunities closer to home. The restriction was also designed to address crowding issues in 3911 and other general season MH hunts.</p>
<p>We have been successfully managing the hunts in the Sequim area for many years; I don't think the pool of MH hunters will work as well.</p>	<p>We appreciate your help for all these years, but with the elk herd now much smaller, we think an on-call pool of MH will be able to address any damage issues. If this doesn't work out, we can adjust in the future.</p>
<p>Make sure the MH hunts allow hunters to participate from both sides of the state. I buy an eastern Washington elk tag, but can't get on any land in 3911. They keep it to locals only.</p>	<p>We recognize that landowners may feel more comfortable allowing hunter access to those they know (locals). However, our program generally allows anyone to apply or participate regardless of where they live. The concern is that for the permit hunts managed by hunt coordinators, the landowner wants hunters there when the elk are present, so hunters on these lists need to be available quickly. That may not work for everyone and we ask that folks make sure they can be available quickly if they commit to one of these permit hunts.</p>
<p>I support the Department's recommended change in GMUs 127 & 130 to antlerless only.</p>	<p>Thank you for your support.</p>
<p>I support the MH permit hunts that use a hunt coordinator; this has worked out well for several western Wash. Hunts.</p>	<p>Thank you for your support.</p>
<p>Thank you for asking MH to participate in the planning stage for the next couple year's hunts. I support using MH as a tool and not take opportunities away from general hunters.</p>	<p>You are welcome, thank you for commenting and for your support.</p>
<p>I am not sure I like the proposed changes for the Turnbull area, but currently it is a good ole boy hunt. Only those who know a landowner get to hunt. Maybe we need a limit on how many elk a MH can kill in these hunts year after year. I like the MH orientation that occurs for the 3911 hunt and recommend expanding that system.</p>	<p>We will give the current proposal a chance to see how it works in the Spokane area. The 3911 hunt is pretty unique and works well and many other MH hunts managed by hunt coordinators do require an orientation before a hunter can participate.</p>

COMMENTS	AGENCY RESPONSE
<p>I have found that the best way to get permission to hunt on private land is to hide the fact that I am a Master Hunter. I have been denied access to land solely because I am a MH. The 3911 hunt is no longer worth paying the cost of a second tag; there just aren't enough elk in the area. WDFW should recognize that most folks who take the MH course are interested in extending the hunting opportunity not understanding the biology or conservation history. WDFW should increase the hunting opportunities, success, and quality of animals harvested. The emphasis of the MH program should shift to the ability to shoot, track, identify, and hunt safely. You should also use the Wyoming system of paying a landowner if a hunter harvests an animal on his property.</p>	<p>We appreciate your comments, but our perspective on what we are looking for in the MH program is different than yours.</p>
<p>I would classify myself as a disillusioned Master Hunter. I completed the requirements and became a MH in 2009 in order to take advantage of additional hunting opportunities. This program has not opened up any additional lands or opportunities. You should just cancel the MH program.</p>	<p>We are attempting to attract a core of hunters that have high ethical hunting values to model and mentor that standard to others. Everyone is welcome and encouraged to become a MH, but we feel that the primary motivation should be something besides a special hunting opportunity. We will continue to seek the right balance with hunting opportunities for MH.</p>
<p>After reviewing the entirety of changes, I want to note that the program truly seems to be growing and developing in a positive direction.</p>	<p>Thanks for your support.</p>
<p>Please do not change the boundary of 3911 and also consider extending the general season through December 31.</p>	<p>The boundary of the 3911 hunt seems to change fairly regularly, however we are not proposing a change for 2012. We have been fairly successful with reducing the damage concerns in the Ellensburg area and would like to reduce the number of elk killed for damage reasons. The transition timing of the general season to a permit season is based on these objectives. The Department's current harvest and management objectives are to shift some of the antlerless elk harvest from damage mitigation to the recreational season.</p>
<p>I stopped hunting the MH seasons in the Cheney area due to low property access. When I did get access, I was given a specific area to hunt while the family and friends got the primo spot.</p>	<p>Thank you for your comment.</p>
<p>I received a pumice plains permit last year and harvested a cow, but saw some trophy class bulls. Would it be possible to add a bull tag or two in Pumice Plains?</p>	<p>At this point, the USFS objectives are to reduce impacts to this natural area. Harvesting cows is the best way to reduce elk numbers and their impact on the habitat.</p>
<p>My partner and I have tried to get access in the area of GMUs 127 & 130. Some of the ranches are leased out, some save it for themselves, and some for family only. This hunt needs to go to a permit drawing only.</p>	<p>We are trying to develop a balance between landowners and those currently gaining access with others who would like a chance to hunt in this area. We have modified our recommendation to retain an antlerless general season hunt in December for GMUs 127 & 130 and MH permits that would be called on when a landowner has a problem they would like help with.</p>
<p>I definitely agree with the proposed changes "on-call" lists and plan to get on the Region 5 & 6 lists. I have had a good experience in the past, though I had to work pretty hard and be available for many days in order to be successful.</p>	<p>Thank you for your support.</p>
<p>I agree with the Toledo hunts except I think the December hunt has too many tags. This herd has been significantly reduced. The on-call system may be okay, but it needs to be implemented fairly.</p>	<p>We will continue to use a number of hunts to help us manage the population level of the Mt. St Helens elk herd and their impact on private property. The planned reduction of this herd is not completed yet. We do plan to use a set of procedures to ensure that the on-call permits are fair to everyone.</p>

COMMENTS	AGENCY RESPONSE
Proposing changes to the hunts available to MH on the deadline of the application process is wrong. Many applicants may have chosen to not enroll had they been aware of the changes.	The timing of the application period and the hunting season recommendations is just co-incidental.
Establish permit seasons and dates for MH permits gives the hunter more flexibility and allows for better planning of time off from work etc. than Regional pools.	We recognize that trying to balance the seasons and dates and potential for being called at any time are all considerations that hunters must deal with. Balancing the needs of landowners with damage problems and hunters is challenging. We try to provide a mix of options for both.
Why are you suggesting limiting the 3911 hunt to modern firearm only?	As a practical matter, the terrain is pretty open and most hunters use modern firearms in this area.

COMMENTS	AGENCY RESPONSE
<p>I am a landowner and a Master Hunter living adjacent to Turnbull NWR in GMU 130. I am concerned about the changes to the late Master Hunter general elk hunt.</p> <p>I am mad and my neighbors are mad. I ask that you vote no to eliminate the master hunter hunts in GMUs 127 and 130. It's working just fine the way it is.</p>	<p>The Department feels the Master Hunter "Any elk" hunts in GMUs 127-142 are not consistent with the Master Hunter objective.</p> <p>We are proposing to retain a modern firearm Master Hunter "Antlerless" opportunity during the same December timeframe in GMUs 127 and 130, which should meet the agricultural damage mitigation needs of you and your neighbors.</p>
<p>I've been a Master Hunter for a long time. First, we pay for some exceptional biologists and they do a great job on the biology. They don't get to work with the landowners and landowner relationships, the Master Hunters do that. If we're going to make political decisions disregarding the biologists then we don't need to have biologists. The Selkirk Plan says the herd south of the Spokane River is increasing, the harvest is increasing, and the number of hunters is stagnant and damage claims have been reduced. The Master Hunter Program in those 6 units has been extremely successful.</p> <p>I support recommending status quo in the 6 GMUs mentioned.</p>	<p>Department biologists work with landowners on a constant basis.</p> <p>The Department feels the Master Hunter "Any elk" hunts in GMUs 127-142 are not consistent with the Master Hunter objective.</p> <p>There are general season, "Any elk," hunting opportunities for modern firearm, archery, and muzzleloader that will provide opportunity for all elk hunters and provide adequate harvest pressure that will be consistent with the Selkirk Elk Herd Plan. If Master Hunters have developed good relationships with landowners they should still be able to hunt during those early and late general season timeframes.</p> <p>We are also proposing to retain a modern firearm Master Hunter "Antlerless" opportunity during the late December timeframe in GMUs 127 and 130. That too will be consistent with the Selkirk Elk Herd Plan and will allow Master Hunters to continue to assist private landowners.</p>
<p>I am opposed to the closing of cows in NE Washington. Looking at table 9 and 13 in the Selkirk plan, both these tables prove the elk herd is growing, so the question is: "Are we having a growing elk herd, but we want it to grow more?" We don't have any problems right now as far as rancher complaints. So why? We were told it's because sportsman's groups wanted it. Do we want them for wolves? If it is just for more elk, we're already doing that. We're killing more elk every year and it is taking less man-days to do it. I don't understand why we're going to bulls only. It's not going to do any good for wolves. When you've got wolves, you're not going to have elk. Your answers are across the border in Idaho.</p>	<p>The proposed changes are intended to manage for a limited increase in elk numbers to create more hunting opportunity in the long run. To do that GMUs 101 through 121 and 204 need to be managed consistently. We are also recommending a few antlerless permits in this area.</p> <p>As wolves continue to expand, they may have an impact on elk populations. If so, we will have to adjust hunting seasons to deal with that. Recent data from Idaho indicates that of 29 elk herds, nine are above objective and nine are below objective. Of the nine below objective, four or five are impacted by wolves. However, several of the nine herds that are above objective also have healthy wolf populations. It is just not a clear-cut relationship.</p>

COMMENTS	AGENCY RESPONSE
<p>I am going to approach this from a government to government standpoint. Stevens County has something that we hate and that is the Growth Management Act. There's an RCW for state agencies for dealing with plans that they have to comply with any comprehensive plan that the county develops. That includes agriculture and natural resources and wildlife. The Selkirk Elk Herd Plan doesn't do that. I am against going to an any bull season north of the Spokane River. There will be an increase of 1,500 elk, and they will all be in the agricultural valleys.</p>	<p>The Department appreciates your perspective as a County Commissioner. We are not aware of any of the proposed hunting seasons being in conflict with any RCWs. The Growth Management Act mainly addresses the impacts of development, and we understand that state agencies are required to comply with county policies on proposed developments, including those that might impact agriculture, natural resources, or wildlife. The Selkirk Elk Herd Plan is considered a step-down plan under the overarching Game Management Plan, which has undergone the SEPA process. In addition, the Selkirk Elk Herd Plan was vetted through a series of public meetings and through a public comment period open to all of the citizens of Washington. The proposed hunting season changes are intended to manage for more elk and create more hunting opportunity in the long run. To do that GMUs 101 through 121 and 204 need to be managed consistently.</p>
<p>I have been in the Master Hunter Program since its inception. I am against the changes proposed for Elk Area 3911 in the Kittitas area. The season should start right after the general season closes rather than waiting until Nov. 10. I ask that you consider not approving the change.</p>	<p>Regional staff feel that the general season closing on Sunday, Nov. 4 and then the Master Hunter season opening the following Saturday, Nov. 10 and running until Dec. 16, will provide adequate pressure. There will be additional special permits available after these late general seasons close, if additional effort is needed.</p>
<p>The Colockum elk herd has a problem. Lots of habitat, but it's not meeting our management needs. We could put a lot more elk in there. Killing cows to bring your bull:cow ratio into alignment only looks good on paper. The Colockum Chapter of the Rocky Mountain Elk Foundation thinks there should be a lot of road closures. There needs to be a lot of road closures. During winter elk need to be left alone, and during spring when calving. They also need to be left alone during pre-rut and rut seasons. We should allow them to stay where they belong and that would cause less agricultural damage. There are too many people recreating where the deer and elk are. Signs don't work; you have to have gates.</p>	<p>Thank you for your suggestions. Both the Department and the Fish and Wildlife Commission are committed to exploring the proposals you are suggesting.</p>

COMMENTS	AGENCY RESPONSE
<p>The Colockum herd has been below objective for several years despite what WDFW has done to improve things. The Department is now proposing to offer cow permits. We fail to see how killing cows is going to help. Antlerless permits will also result in some bull calves being killed. It is not good management to harvest more cows from this herd. The range is not overgrazed, although there are some opportunities for habitat improvement. The lack of mature bulls is a result of Yakama Nation members take. Concerns have been expressed about the commercialization of elk parts; I don't consider this subsistence hunting. There must be a way to negotiate with this tribe. A partial solution that might be to trade damage control permits in exchange for their not killing mature bulls before breeding season.</p> <p>We also believe that the Colockum elk herd would benefit from reduced disturbance by humans. Gating and signing more roads to restrict public travel during times of the year when elk are sensitive to human trespass would not only reduce this disturbance but help control poaching.</p> <p>And, of course, another threat to the Colockum herd is the recovering wolf population. The Teanaway pack is already feeding on Colockum elk, and they will produce more packs. They will not only prey on elk, but drive these elk into areas where they will interfere with agriculture, thus requiring more damage control permits and further deplete the herd.</p>	<p>The Department and the Fish and Wildlife Commission are committed to exploring the proposals you are suggesting.</p> <p>Many of our efforts have been successful and the elk herd has grown to the point that it is exceeding our objectives. That is why we are recommending antlerless harvest.</p> <p>We continue to work at improving bull escapement because we are not meeting our bull:cow ratio objectives. The "true spike" rule was implemented three years ago and is showing good promise. We expect to see improved bull ratios, but remain committed to seeking better road management and will continue to work with the Yakama Tribe as well.</p> <p>At this point, it is difficult to speculate on what the wolf impacts will be on the Colockum herd, but we will be closely monitoring both elk and wolves.</p>
<p>I'm here to talk about Colockum elk. I spent thousands of hours watching elk. It used to be that you could see lots of elk in the summer, because of the fire danger closures they wouldn't let people in there. So there were plenty of deer and elk in there. But they don't do that anymore because some judge said it wasn't legal. With spike only season we've got a lot of branch antlered bulls and that was great. But then the Indians discovered and started taking the branch antlered bulls, and now we don't have enough branch antlered bulls. There used to be a lot of hunting camps in there in the fall, and last year I only saw three. I second most of what Norm said, I think he's got some good ideas there.</p>	<p>Thank you for your suggestions. Both the Department and the Fish and Wildlife Commission are committed to exploring the proposals you are suggesting.</p>

COMMENTS	AGENCY RESPONSE
<p>I wanted to talk about the changes in archery. I am an archer and a Master Hunter. I am an ethical hunter and am teaching my kids to be ethical hunters. The archery season keeps moving closer and closer to the first of September. When that happens we're going to be hunting at times when people are up in the mountains camping during the Labor Day weekend, and that is wrong and unethical. The weather is too warm and it is too difficult to keep the meat from spoiling. It is completely unethical. Also modern firearm and muzzleloader seasons both open on a Saturday. Archery is the only one that doesn't open on a Saturday. It should open the Saturday after Labor Day.</p>	<p>For the most part, what you describe is the result of calendar date adjustments.</p> <p>Warm weather can be an issue throughout the entire month of September and into early October for deer, elk, and bear. Weather impacts every aspect of hunting regardless of the month. Hunters need to plan accordingly. The real issue is hunters wanting to be hunting closer to the breeding season when bulls are more vulnerable.</p> <p>If we continue with this system of opening the Tuesday after Labor Day, the opener in 2015 will be Sept. 8, the opener in 2016 will be Sept. 6, and for 2017 it will be Sept. 5.</p> <p>The Department offers a wide variety of hunting seasons. Some of them open on Saturdays and close on Sundays, but many do not.</p> <p>For the last three-year package 2009-2011, the Department believed the number of mature bulls being taken by archers in western Washington as compared to other user groups was disproportionate. It was disproportionate whether we looked at five point or better, or six point or better, bulls.</p> <p>Success rates for eastern Washington early archery branch-antlered bull permits have been consistent by hunt regardless of start dates. This is largely because bull permits are allocated by a formula that considers the user group's proportion of all hunters and their success rate. So, in the last three-year package two changes were made. One was to create a very small number of prime time special permits for modern firearm hunters in the last week of September, ending before the beginning of muzzleloader deer season. The other was to move archery general seasons to start the Tuesday after Labor Day. Because this date floats with the changing calendar, the start date does sometimes start early in September. Initially the proposal was to return early archery seasons to the historical Sept. 1-15 time period, but that was unacceptable to archery representatives, so the negotiated compromise was to start the Tuesday after Labor Day.</p>

WAC 232-28-359 2012 Deer special permits.

A. Agency reason for adoption: This rule continues to provide recreational deer hunting opportunity, above that offered during general seasons; protects deer from overharvest; and helps minimize deer agricultural damage.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- The following Quality mule deer hunt dates have been changed from Nov. 20-24 to Nov. 10-20: Kelly Hill, Douglas, Aladdin, Selkirk, 49 Degrees North, and Huckleberry. The former date was

too late for mule deer. Last year hunters were snowed out and mule deer were not accessible for a quality hunt.

- The following Quality modern firearm special permit hunts have had their permit numbers changed because higher deer numbers allow for more opportunity, or the permit allocation formula calculated different permit numbers from the previous year, or both.
 - Dayton, change from 3 to 5 permits.
 - Tucannon, change from 1 to 2 permits.
 - Sinlahekin, change from 5 to 10 permits.
 - Pogue, change from 15 to 20 permits.
 - Chiwawa, change from 24 to 28 permits.
 - Slide Ridge, change from 9 to 11 permits.
 - Ritzville, change from 10 to 12 permits.
 - Desert, Oct. 27-Nov 4, change from 15 to 17 permits.
 - Desert, Nov. 17-25, change from 4 to 5 permits.
 - Naneum change from Nov. 15 to 14 permits.
- The following Quality modern firearm special permit hunts have had their permit numbers changed because higher deer numbers allow for more opportunity, or the permit allocation formula calculated different permit numbers from the previous year, or both.
 - Teanaway, change from 15 to 14 permits.
 - L.T. Murray, change from 2 to 5 permits.
 - Alkali, change from 5 to 6 permits.
- Under Quality, modern firearm:
 - Change the date for Green River from Nov. 12-18 to Oct. 27-Nov. 2. The hunting dates for Green River are negotiated between the Department, the Muckleshoot Indian Tribe and Tacoma Watershed.
- The following Quality archery special permit hunts have had their permit numbers changed because higher deer numbers allow for more opportunity, or the permit allocation formula calculated different permit numbers from the previous year, or both.
 - Slide Ridge, change from 2 to 3 permits.
 - Desert, change from 20 to 29 permits.
 - Naneum, change from 8 to 6 permits.
 - Quilomene, change from 9 to 6 permits.
 - Teanaway, change from 13 to 9 permits.
- The following Quality muzzleloader special permit hunts have had their permit numbers changed because a change in deer numbers changes the level of opportunity, or the permit allocation formula calculated different permit numbers from the previous year, or both.
 - Chiwawa, change from 2 to 3 permits.
 - Mission, change from 17 to 15 permits.
 - Desert, change from 2 to 3 permits.
 - L. T. Murray, change from 2 to 1 permit.
 - Bald Mountain, change from 10 to 2 permits.
 - Quilomene, change from 3 to 6 permits.
- The following Bucks modern firearm special permit hunt has had its permit number changed because a change in deer numbers changes the level of opportunity, or the permit allocation formula calculated a different permit number from the previous year, or both.
 - Pogue, change from 15 to 20 permits.

- The following Bucks archery special permit hunt has had its permit number changed because a change in deer numbers changes the level of opportunity, or the permit allocation formula calculated a different permit number from the previous year, or both.
 - Ritzville, change from 5 to 4 permits.
- Under the Bucks archery category, add Whitcomb, Sept. 10-15, 10 permits and Paterson, Sept. 10-15, 10 permits. These opportunities on these two deer areas are alternated between archery and muzzleloaders annually, per an agreement with U.S. Fish and Wildlife Service who is the primary land manager.
- The following Bucks muzzleloader special permit hunt has had its permit number changed because a change in deer numbers changes the level of opportunity, or the permit allocation formula calculated a different permit number from the previous year, or both.
 - Ritzville, change from 5 to 1 permit.
- Under the Bucks muzzleloader category, remove Whitcomb, Sept. 10-15, 10 permits and Paterson, Sept. 10-15, 10 permits. These opportunities on these two Deer Areas are alternated between archery and muzzleloaders annually, per an agreement with U.S. Fish and Wildlife Service who is the primary land manager.
- Under the Antlerless modern firearm category, clarify that the Blue Creek, Dayton, and Marengo hunts are specific to white-tailed deer.
- Under the Antlerless archery category, remove Whitcomb, Sept. 15-23, and Patterson, Sept. 15-23, and add them to the Antlerless muzzleloader category. These opportunities on these two deer areas are alternated between archery and muzzleloaders annually, per an agreement with U.S. Fish and Wildlife Service who is the primary land manager. Also, change the number of permits for Whitcomb from 7 to 10 to provide additional opportunity.
- Under the Antlerless muzzleloader category, change the dates on Whitcomb, Sept. 1-9, to Sept. 16-21, and change the permits from 7 to 10. This change was based on landowner input and the need to remove animals more effectively.
- Under the Antlerless muzzleloader category, change the dates on Paterson, Sept. 1-9, to Sept. 16-21. This change was made based on landowner input.
- Under the 2nd Deer modern firearm category, change the date from Jan.1-20, 2012 to Jan. 1-20, 2013. This change corrects an oversight of the calendar date adjustments.
- Under the 2nd Deer modern firearm category, increase the permits for the following hunts. The increase is needed for population control and to help mitigate damage.
 - Steptoe, change from 150 permits to 200 permits.
 - Almota, change from 100 permits to 150 permits.
- Under Youth, modern firearm, clarify that Tucannon, Oct. 13-21, is for white-tailed antlerless deer only.
- Under Youth, modern firearm, change the Green River season dates from Nov. 12-18 to Oct. 27-Nov. 2, and change the legal deer from Any buck to Any deer. The hunting dates for Green River are negotiated between the Department, the Muckleshoot Indian Tribe, and Tacoma Watershed. The change to Any deer provides more potential opportunity for Youth.
- Under Youth, modern firearm, change the Skookumchuck, any buck, season dates from Oct. 6-31 to Oct. 6-12. This change corrects a typographical error.
- Under Senior 65+, modern firearm, change the dates on the following two hunts:
 - Horse Heaven Hills, change from Oct. 15-28, to Oct. 13-26.
 - Kahlotus, change from Oct. 15-23, to Oct. 13-21.
 These changes correct an oversight of the calendar date adjustments.
- Under Senior 65+, modern firearm, delete the Green River hunt. This hunt is alternated each year between the Senior and Hunters with Disabilities categories.
- Under Hunters with Disabilities, modern firearm, change the dates on the following hunt:

- Horse Heaven Hills, change from Oct. 15-28 to Oct. 13-26.
- Under hunters with Disabilities, add the following hunt:

Green River	Modern	Hunter with Disability	Oct. 27- Nov. 2	Antlerless	GMU 485	5
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This hunt is alternated each year between the Senior and Hunters with Disabilities categories.

- Under the Master Hunters category:
 - For Region 1 Central, change from 10^{HC} permits to 20^{HC} permits.
 - For Region 1 South, change from 10^{HC} permits to 20^{HC} permits.
 - For Region 3, change from Unlimited permits to 20^{HC} permits.
 - Delete the Miller hunt. The removals needed at this location are of a sensitive nature and include a local airport. Region 6 staff determined that using USDA, APHIS, Wildlife Services will be the best approach to dealing with this problem.
 - For Region 5, change from Unlimited permits to 20^{HC} permits.
 - For Region 6, change from Unlimited permits to 20^{HC} permits.
- The permit changes address concerns expressed by Master Hunters and Enforcement. The date change corrects an oversight of the calendar date adjustments.
- Under Hunter Education Instructor Incentive Permits:
 - Reinstate a Region 2 hunt, providing 2 permits for any white-tailed deer in GMUs 204-215. This hunt was dropped in error.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>We have been waiting for a chance to report on a problem that has been over looked for the last 3 Yrs. The 4 day special hunt w/50 permits that were awarded for the general rifle hunters for the late hunt in GMU 388 was changed to 21 days long ending the day before the late archery season opens and the archers have had the antler-less/Doe`s taken away! We have counted enough fresh deer hides and cut off legs for 14 deer, That`s 14 bucks, 3 point or better in just a 360 acre area. This section of GMU 388 is bordered by Camp creek to the SW, the Goldendale Rd. to the SE and the Glenwood Rd. to the N. It`s a 360 acre triangle of public hunting land surrounded by Privet land, we have archery hunted this area for 40 yrs.</p> <p>and spend time there yr. round. We turkey hunt there every spring, camp there every summer, spend many day trips there Yr. round. The Triangle area of this unit would do well to be made into an Archery only unit within the 388 unit. There are only two access`s to the area and would be easy to post. The buck only rule is the most un-fair part of this, Archer`s cannot shoot 100/150/200/300 Yds. as the modern rifle does, We shoot 20 to 40 Yds. average, We must also pull our bows without being seen let alone hold the drawl sometimes for minutes. the chance of getting a deer in shooting range are 100 to 1 of that of a rifle hunter let alone it being a buck and a 3 point or better buck at that. The group who is making the rules for our hunting seasons needs to spend a day in our boots! We look forward to some resolve of these mistakes of the past 3 yrs.</p>	<p>There are 40 special permits in the modern firearm quality deer hunt in GMU 388. That season is proposed to run from Nov. 1-20 this year.</p> <p>Archers in that same GMU have a 28 day early general season and a 19 late general season.</p> <p>In 2010, the modern firearm special permit hunters killed 6 bucks. In 2011, the modern firearm special permit hunters killed 19 bucks.</p> <p>At this time the Region feels it is recommending all the opportunity it can. Visiting with the District Biologist and the Regional Wildlife Manager might be in order to explore any possible increased opportunities in future years.</p>

COMMENTS	AGENCY RESPONSE
<p>While you considering big game seasons for 2012-2014 consider this: With only a couple of exceptions in extremely remote country in Idaho, there are no unlimited(general) mule deer hunts IN ANY STATE during the mule deer rut(most of November), with any weapon except in Washington. The late archery mule deer seasons in Central Washington, particularly in Okanogan and Chelan counties, need to be made into permit controlled hunts with very limited tag quotas! WDFW needs to limit the harassment of mature mule deer bucks during this vulnerable period just before the stresses of winter. These unlimited seasons in units 209, 215, 233, 243, and 250 were first created decades ago, when there far fewer late seasons bow hunters and many more mule deer around. It is long past time to limit this significant impact to this dwindling resource!</p>	<p>The management strategies for late season mule deer hunting in Region 2 are very conservative and the Department's recommendations reflect that. The vulnerability of mule deer on winter range and the detrimental effects of extensive disturbance during that time period are string reasons not to expand late season hunting in those units. The Department will continue to work with all the user groups to try to find a balance between offering hunting opportunity and doing what is best for the mule deer populations.</p>
<p>Just an observation regarding the new proposal. YOUTH Special Permit section- Skookumchuck Any Buck 20 permits Modern Firearm the dates for the 20 proposed permits for Any Buck show Oct 6-Oct 31. The inclusive dates of Oct-13-Oct 31 are already proposed for an open GMU 667 for Western Washington Black-tailed General Season with Any Buck allowed. The correct dates for these permits should only state, Oct 6th - Oct 12th. Due to the fact, the youth hunter does not require a permit to hunt during the general season dates. The current dates appear to be miss-leading.</p>	<p>You are right. Thank you for pointing out this error. The correction has been made.</p>
<p>I would like the commission to take a look at the large number of really big two point Mule Deer running around. These are older/huge Mule Deer (22-25 in. width, 18-20 in height) that will not get a third point because of their gene pool. These deer are only breeding more two points and need to be culled out of the deer population. I would like the commission to look at this problem and come up with a way to issue a select number of permits to solve this issue.</p>	<p>The Commission has approved just such a special permit hunt for the last few years. The current recommendation has 4 hunts with this type of season structure in GMUs 133, 136, 139, and 142. Region 1 Biologists are also trying to get these special permit hunters to collect teeth and take photographs of their harvested 2x2 bucks. The Department will continue to explore this question.</p>
<p>The eastern units with the late general deer season extending to November 19th (units 104 through 124) also have a quality special permit for 6 special modern permits (5 white-tailed bucks and 1 mule deer buck) from November 20-24. We would like to see these quality permit hunts available to all hunting methods. Allowing muzzleloader hunters to apply for these permits will give opportunities to hunt the northeast units during the late hunt, which is currently not available to them. Archery hunters would also have an opportunity for a few permits to extend their hunting opportunities like the modern firearm hunters have enjoyed in recent years. The current recommendation is 5 permits for any white-tailed buck per unit. Units 117 and 121 should be 5 permits for 4-pt minimum white-tailed buck. This would be consistent with all white-tailed buck hunts in these units. Additionally, this change will raise additional income for the Department by allowing 2 new user groups to apply for a limited number of special hunt permits.</p>	<p>The Department received 11 identical messages of this nature representing the position of one organization. The Department is recommending archery seasons for white-tailed deer in GMUs 101, 105, 108, and 124 in the late general season. The Department is also recommending late archery for 4 pt. min. and antlerless white-tailed deer in GMUs 117 and 121. There doesn't seem to be a need to also create special permits. The Department will explore the possibility of quality muzzleloader permits in future years but the Region is not recommending any at this time.</p>

COMMENTS	AGENCY RESPONSE
<p>I personally don't think it's right to increase the number of applications for Deer and Elk. I feel the game department is just wanting more money though application fees. I also feel that the commissioners don't care about the deer and elk herds. If you want the population of deer and elk to grow you should cut back on Doe and Cow Permits and not have so many seasons. The seasons now begin in Sept. and go way into Jan. for elk and the season for deer begin in Late Sept. and go into Dec. in some areas. KEEP IT UP AND THERE WON'T BE ANY ANIMALS TO HUNT. Have the same number of days to hunt for all three weapons on different weeks and when that over its over for all hunters. That will let the herds rest and flourish. PS: Open the season later for deer and elk than the harvest will be good and lift the antler restrictions little.</p>	<p>The Department was very clear back in 2010 that part of the reason we recommended the current special permit category system was to generate more revenue. That revenue is now being used to improve access for hunting. Department Biologists do not recommend hunting seasons that will have a detrimental effect on the overall populations. Your message is inconsistent. You indicate that the current season structure is too aggressive, yet you recommend we shift hunting seasons later when deer and elk are more vulnerable which would result in a higher harvest.</p>
<p>Female harvest, especially in deer, is currently out of hand. The Department continues to issue a high number of doe tags in areas that have poor habitat and high mortality from pouching and cougars, just to provide opportunity. This is not right. Local biologists agree there is an over harvest but Olympia wants to sell tags.</p>	<p>Hunting season recommendations always start at the District level. If District Biologists feel reductions need to be made in antlerless opportunity they will do so.</p>
<p>Unfortunately there is no such hunt or even a quality tag hunt just for the youth to hunt big game except for antlerless. I would love to see a quality season for antlered deer and elk, even if it was only a two day hunt, for youth to experience big game hunting without everyone else. After all they are the future of hunting.</p>	<p>There are a few youth deer special permit opportunities similar to what you've described but you are right, except for one exception, most of those opportunities are antlerless. We will take your suggestion under advisement but there are so many user groups asking for extra time or exceptional time, that there is very little room left on the calendar and most do not want to give up opportunities when they pertain to bucks and bulls.</p>
<p>WAC 232-28-359 2012 Deer special permits. Extending the Hunters 65+ either sex White Tail seasons would help farmers protect their crops by reducing the large numbers of does that are naturally attracted to agricultural lands. Please consider designating antlerless only instead of "either sex" for Hunters 65+ during all general and late firearm seasons.</p>	<p>Thanks for the input. We're getting all the help that we need on the antlerless special permits in 65+ category. If the Regional Biologists identify the need to expand those time frames, they have the flexibility to recommend those changes.</p>
<p>For Deer Area 4013 (Vashon-Maury) I strongly suggest making the 2nd deer permit for modern firearm "any deer" instead of antlerless. There are far too many deer on the islands and making this any deer will increase the applicants and therefore increase the deer harvest. Over the past few years there have been fewer applicants than permits available. Since the cost for a second deer has also increased by ~250%, making it any deer will make it worth it for more hunters if they have the opportunity to harvest a second large buck.</p>	<p>We agree there are too many deer on many of the islands and the special permits are designated antlerless because the best way to reduce a deer population through hunting is to focus harvest on the reproductive age females.</p>

COMMENTS	AGENCY RESPONSE
<p>I am from Grant County, born and raised, and I have hunted for 55 years. I want to know why we don't have doe permits in Grant County? I saw 150 deer in the field after the rifle season. There are low buck ratios and we need to create some youth deer permits to reduce crop damage. Corn fields and hay fields are being damaged by deer. If each deer eats 10 pounds of forage per day, figure the amount of dollars that equals.</p> <p>You should require farmers that take CRP funds to open their lands to the public for hunting. If you take money from the government, you should allow hunting.</p> <p>Buckrun does not provide public opportunity. That is false and people don't want it. It's not a quality hunt and it's not doing anything for the general population.</p>	<p>The Department is not receiving any damage complaints from landowners through the usual, formal channels, and therefore, does not see a need for antlerless special permits above and beyond what is currently being offered.</p> <p>The Fish and wildlife Commission does not have the authority to impose a requirement of allowing public hunting on lands owned by farmers that receive federal subsidies.</p> <p>As part of the Landowner Hunting Permit program, Buckrun and all of the other landowners participating in the program are contractually required to provide a certain level of public hunting opportunity. The breakdown for each landowner is in WAC 232-28-296.</p>

WAC 232-28-360 2012 Elk special permits.

A. Agency reason for adoption: This rule continues to provide recreational elk hunting opportunity, above that offered during general seasons; protects elk from overharvest; and helps minimize elk agricultural damage.

B. Changes, if any, from the text of the proposed rule and reasons for difference:

- Under the Quality category:
 - Remove the CPWMA hunt. This hunt appears in the Landowner Hunting Permit WAC and does not need to be in the special permit WAC.
 - Change the date for Prescott from Sept. 21-24 to Sept. 24-28. This change avoids an overlap between modern firearm and archery seasons.
 - Change the number of permits for Prescott, Oct. 22-Nov. 4, from 2 permits to 4 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the date for Blue Creek from Sept. 21-25 to Sept. 24-28. This change avoids an overlap between modern firearm and archery seasons.
 - Change the number of permits for Blue Creek, Oct. 22-Nov. 4, from 6 permits to 5 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Under the Quality modern firearm category:
 - Change the number of permits for Dayton, Oct. 22-Nov. 4, from 17 permits to 26 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the date for Ten Ten from Sept. 21-24 to Sept. 24-28. This change avoids an overlap between modern firearm and archery seasons.
 - Change the number of permits for Ten Ten, Oct. 22-Nov. 4, from 14 permits to 12 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the number of permits for Tucannon, Oct. 22-Nov. 4, from 13 permits to 14 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.

- Change the number of permits for Wenaha West, Oct. 22-Nov. 4, from 13 permits to 15 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Wenaha East, Oct. 22-Nov. 4, from 16 permits to 21 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Mountain View, Oct. 22-Nov. 4, from 13 permits to 20 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Lick Creek, Oct. 22-Nov. 4, from 4 permits to 10 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the date for Peola from Sept. 21-24 to Sept. 24-28. This change avoids an overlap between modern firearm and archery seasons.
- Change the number of permits for Peola, Oct. 22-Nov. 4, from 1 permit to 2 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Couse, Oct. 22-Nov. 4, from 2 permits to 3 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Colockum, Oct. 22-Nov. 4, from 2 permits to 7 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Add GMU 335 to Colockum, Sept. 24-28. This change would make the GMUs open on the September rifle hunt consistent with the other Colockum special permit hunts.
- Change the number of permits for Little Naches, Oct. 1-10, from 7 permits to 10 permits. This change is the result of more bulls available for harvest based on the February aerial surveys.
- Move the two modern firearm Margaret hunts from the Quality category to the Bulls category. Because of private land access issues, these hunts no longer meet the criteria for Quality.
- Change the number of permits for Toutle, Nov. 3-14, from 209 permits to 129 permits. This change is intended to reduce overcrowding during the quality hunt, but still maintain the level of harvest in 2010.
- Under the Quality archery category:
 - Change the number of permits for Blue Creek, Sept. 1-19, from 4 permits to 3 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the number of permits for Dayton, Sept. 1-19, from 7 permits to 14 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the number of permits for Ten Ten, Sept. 1-19, from 7 permits to 8 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the number of permits for Tucannon, Sept. 1-19, from 7 permits to 8 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.

- Change the number of permits for Wenaha West, Sept. 1-19, from 4 permits to 5 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Wenaha East, Sept. 1-19, from 6 permits to 11 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Mountain View, Sept. 1-19, from 8 permits to 11 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Lick Creek, Sept. 1-19, from 3 permits to 11 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Colockum, Sept. 4-16, from 2 permits to 6 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Peaches Ridge, Sept. 4-16, from 81 permits to 101 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Observatory, Sept. 4-16, from 89 permits to 130 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Goose Prairie, Sept. 4-16, from 70 permits to 65 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Bethel, Sept. 4-16, from 25 permits to 29 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Rimrock, Sept. 4-16, from 85 permits to 97 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Cowiche, Sept. 4-16, from 11 permits to 19 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Reinstate the Klickitat Meadows, Oct. 11-21, hunt with 1 permit. Region 3 anticipated removing this hunt but upon further deliberation, changed their position.
- Move the archery Margaret hunt from the Quality category to the Bulls category. Because of private land access issues this hunt no longer meets the criteria of Quality. Change the number of permits for Margaret, Sept. 8-23 and Dec. 1-15, from 23 permits to 29 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula, and at the same time, keeping hunter crowding down.
- Change the number of permits for Toutle, Sept. 8-23 and Dec. 1-15, from 124 permits to 80 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula, and at the same time, keeping hunter crowding down.
- Under the Quality muzzleloader category:
 - Change the number of permits for Blue Creek, Oct. 1-12, from 2 permits to 1 permit. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.

- Change the number of permits for Dayton, Oct. 1-12, from 3 permits to 5 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Ten Ten, Oct. 1-12, from 3 permits to 6 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Wenaha West, Oct. 1-12, from 2 permits to 3 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Wenaha East, Oct. 1-12, from 2 permits to 3 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Mountain View West, Oct. 1-12, from 4 permits to 8 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Lick Creek, Oct. 1-12, from 1 permit to 2 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Peaches Ridge, Oct. 1-10, from 20 permits to 26 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Observatory, Oct. 1-10, from 17 permits to 21 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Goose Prairie, Oct. 1-10, from 13 permits to 15 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Bethel, Oct. 1-10, from 13 permits to 14 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Rimrock, Oct. 1-10, from 17 permits to 13 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Cowiche, Oct. 1-10, from 6 permits to 10 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Reinstate the Klickitat Meadows, Oct. 1-10, hunt with 1 permit. Region 3 anticipated removing this hunt but upon further deliberation, changed their position.
- Move the muzzleloader Margaret hunt to the Bulls category. Because of private land access issues this hunt no longer meets the criteria for Quality. Change the number of permits for Margaret, Oct. 6-12, from 13 permits to 14 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula, and at the same time, keeping hunter crowding down.
- Change the number of permits for Toutle, Oct. 6-12, from 46 permits to 28 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula, and at the same time, keeping hunter crowding down.
- Under the Bull modern firearm category:
 - Change the number of permits for Teanaway, Dec. 17-31, from 8 permits to 10 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.

- Change the number of permits for Observatory, Oct. 22-Nov. 4, from 63 permits to 64 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Goose Prairie, Oct. 22-Nov. 4, from 77 permits to 74 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Bethel, Oct. 22-Nov. 4, from 61 permits to 63 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Rimrock, Oct. 22-Nov. 4, from 114 permits to 120 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for Cowiche, Oct. 22-Nov. 4, from 17 permits to 22 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Reinstate the Klickitat Meadows, Oct. 22-Nov. 4, hunt with 1 permit. Region 3 anticipated removing this hunt, but upon further deliberation, changed their position.
- Remove Alkali, Oct. 13-Nov. 2, Any elk, 20 permits. This hunt was converted to an antlerless only hunt.
- Change the number of permits for Olympic, Nov. 3-14, from 14 permits to 20 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Change the number of permits for White River, Nov. 3-14, from 30 permits to 24 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Under the Bulls, archery category:
 - Change the number of permits for Teanaway, Nov. 21-Dec. 8, from 10 permits to 8 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
 - Change the number of permits for Skokomish, Sept. 4-16, from 1 permit to 2 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Under Bulls, muzzleloader category:
 - Change the number of permits for Teanaway, Dec. 9-16, from 6 permits to 16 permits. This change is the result of allocating special permits to the three primary user groups using the permit allocation formula.
- Under Antlerless, modern firearm category:
 - Add North Half, Oct. 22-Nov. 4, 10 permits. This new hunt is designed to provide limited antlerless opportunity to replace general season either sex opportunity.
 - Add Stevens, Oct. 22-Nov. 4, 10 permits. This new hunt is designed to provide limited antlerless opportunity to replace general season either sex opportunity.
 - Change the first Prescott hunt, Oct. 13-21, to Blue Creek, GMU 154. This corrects an error and prevents duplication of another hunt.
 - For Marengo-Dayton, Oct. 27-Nov. 4, change the Elk Area from 1011 to 1010. This change corrects a typographical error.
 - Change the number of permits for Teanaway, Dec. 17-31, from 50 permits to 30 permits. This change is in response to decreasing antlerless elk available for harvest.
 - Change the number of permits for Taneum, Oct.31-Nov. 4, from 150 permits to 200 permits. This change is in response to increasing antlerless elk available for harvest.

- Change the number of permits for Manastash, Oct.31-Nov. 4, from 250 permits to 275 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Umtanum, Oct.31-Nov. 4, from 200 permits to 250 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Little Naches, Oct.31-Nov. 4, from 150 permits to 250 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Nile, Oct.31-Nov. 4, from 5 permits to 20 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Bumping, Oct.31-Nov. 4, from 5 permits to 25 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Bethel, Oct.31-Nov. 4, from 5 permits to 20 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Rimrock, Oct.31-Nov. 4, from 200 permits to 250 permits. This change is in response to increasing antlerless elk available for harvest.
- Change the number of permits for Cowiche, Oct.31-Nov. 4, from 200 permits to 250 permits. This change is in response to increasing antlerless elk available for harvest.
- Add Alkali, Oct. 13-Nov. 2, Antlerless, 20 permits. This hunt was converted to an antlerless only hunt from any elk.
- Reinstate the Klickitat Meadows, Oct. 31-Nov. 4, hunt with 5 antlerless permits. Region 3 anticipated removing this hunt but upon further deliberation, changed their position.
- Under Antlerless, archery category:
 - Add Colockum, Sept. 4-16, 50 antlerless permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Add Nile, Sept. 4-16, 50 antlerless permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Add Bumping, Sept. 4-16, 50 antlerless permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Reinstate the Klickitat Meadows and change the date to Oct. 11-21, with 9 antlerless permits. Region 3 anticipated removing this hunt, but upon further deliberation, changed their position. The date change corrects an oversight/error.
- Under Antlerless muzzleloader category:
 - Add North Half, Oct. 1-7, 10 permits. This new hunt is designed to provide limited antlerless opportunity to replace general season either sex opportunity.
 - Add Stevens, Oct. 1-7, 10 permits. This new hunt is designed to provide limited antlerless opportunity to replace general season either sex opportunity.
 - Change the number of permits for Nile, Oct. 6-12, from 5 permits to 20 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Bumping, Oct. 6-12, from 5 permits to 30 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Bethel, Oct. 6-12, from 5 permits to 20 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Cowiche, Oct. 6-12, from 200 permits to 250 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Teanaway, Dec. 9-16, from 6 permits to 10 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Reinstate the Klickitat Meadows, Oct. 1-10, hunt with 5 antlerless permits. Region 3 anticipated removing this hunt, but upon further deliberation, changed their position.
 - Change the dates for Coweeman from Nov. 21-Dec. 30 to Nov. 21-Dec. 15. This change corrects a typographical error.
- Under the Youth category:

- Change the dates for Dungeness from Nov. 1-Dec. 31 to Oct. 1-Dec. 31. More time was recommended for this hunt by Region 6 to better accommodate elk movements and elk distribution.

- Under the 65+ Senior category:
 - Change the number of permits for Taneum, Oct. 31-Nov. 11, from 15 permits to 25 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Manastash, Oct. 31-Nov. 11, from 20 permits to 25 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Umtanum, Oct. 31-Nov. 11, from 20 permits to 25 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the number of permits for Cowiche, Oct. 31-Nov. 11, from 15 permits to 25 permits. This change is in response to an increasing number of antlerless elk available for harvest.
 - Change the date on Centralia Mine from Oct. 20-21 to Jan. 5-6, 2013, and change the number of permits from 3 permits to 4 permits. These changes are negotiated each year with the mining facility.
 - Change the date on Centralia Mine from Oct. 27-28 to Jan. 12-13, 2013, and change the number of permits from 3 permits to 4 permits. These changes are negotiated each year with the mining facility.
- Under the Hunters with Disabilities category:
 - Change the permits for Centralia Mine, Oct. 6-7, from 3 permits to 4 permits. These changes are negotiated each year with the mining facility.
 - Change the permits for Centralia Mine, Oct. 13-14, from 3 permits to 4 permits. These changes are negotiated each year with the mining facility.
- Under the Master Hunter category:
 - For Region 3, change the number of permits from 20^{HC} to 75^{HC}. These permits will potentially be used for Master Hunter Antlerless hunts on the Arid Lands Ecology Reserve (Hanford). The USFS has not finalized their decision on whether a hunting opportunity would be allowed on Harford this fall. That decision is likely to come after the Fish and Wildlife Commission establishes regulations for the 2012 seasons. Previously, the number of permits for this hunt was changed from Unlimited^{HC} (as reflected on the CR102) to 20^{HC}. That change was intended to address concerns expressed by Master Hunters and Enforcement.
 - Reinstate North Bend, 2nd tag, Aug. 15-March 31, 25 permits. This hunt was reinstated when the decision was made to not use and unlimited pool of hunters for Region 4.
 - Reinstate Skagit River, 2nd tag, Aug. 15-March 31, 15 permits. This hunt was reinstated when the decision was made to not use and unlimited pool of hunters for Region 4.
 - For Region 4 North, change the number of permits from Unlimited^{HC} to 20^{HC}. This change addresses concerns expressed by Master Hunters and Enforcement.
 - For Region 4 South, change the number of permits from Unlimited^{HC} to 10^{HC}. This change addresses concerns expressed by Master Hunters and Enforcement.
 - For Region 5, change the “weapon/tag” designation to Any western elk tag/2nd tag, and change the permits from 20^{HC} permits to 40^{HC} permits. This change gives Region 5 more flexibility when using this tool to mitigate damage.
 - For Region 6 change the permits from 10^{HC} to 50^{HC}. This change gives Region 5 more flexibility when using this tool to mitigate damage.

C. Agency responses to written and oral comments:

COMMENTS	AGENCY RESPONSE
<p>Make the early muzzleloader permit season in Toutle season go through Sunday and not end on Friday of the first week in October.</p> <p>Implement a late bull season, even if it is 10 tags in the Coweeman (Quality Hunt).</p> <p>Increase the number of opportunities for Muzzleloader antlerless in Coweeman.</p>	<p>The early muzzleloader season ends on Friday because the modern firearm deer season begins on Saturday. Whenever possible the Department tries to avoid overlaps between weapon groups. A late season quality hunt in Coweeman would likely have a high success rate which would impact the number permits issued during the early season. Muzzleloader antlerless opportunity in Coweeman is one of the highest in the southeast especially when you consider that muzzleloaders make up 12.9% of the elk hunting population.</p>
<p>Unit 574 Late muzzle loader season. Why are you taking more time away? If anything you should add three days, because of the economy!</p>	<p>The special permits for GMU 574 are consistent with the general season dates. In the last three years and the coming three years for GMUs 568, 574 and 578, the late muzzleloader season shifts with the calendar and the Thanksgiving holiday. The opener is the Wednesday before Thanksgiving and the closer is always Nov. 30. The Department does not recommend additional days to hunting season based on the performance of the economy.</p>
<p>I was just curious about the justification for so many cow permits for modern and muzzleloader in the 328 unit. As an avid archer and lifelong hunter in that particular unit I cannot believe there are 0 for archery. What in world is going on and have the objectives suddenly changed. I could care less about the late hunt in that unit. The animals are long gone most years by then. Is the game dept going to make any statement on this, there are a lot of riled up hunters over this particular change. I am asking for the department to shed some light on this, it would really be appreciated.</p>	<p>Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC.</p>
<p>I am a land owner just outside the city of Packwood. Recently we have noticed more and more damage caused by the number of spike and cow elk that migrate through our property. Fences have proven to be worthless, and nothing seems to deter them from the area. Apparently our grass is just irresistible. We purchased the property with the hopes of getting closer to nature, and over the past few years, we have received just that.</p> <p>Through my observations I have noticed that there are an overwhelming number of cow elk concentrated in the Packwood area. I was interested to research hunting regulations thinking that there would be substantial amount of hunting permits available. Currently the general hunting season allows for 3 pt minimum elk to be taken. I agree with the general hunting season consisting of this limitation. However, there are no special permits, excluding the one saved for master hunters, to hunt the large number of cow elk that seem to flood into the Packwood region. I would like to suggest and request a special permit allocated to cow elk in unit 513. It is not unusual to see hundreds of elk within the city limits, most of which consist of spike and cow elk.</p> <p>I appreciate any consideration this letter may receive.</p>	<p>Elk in and around the town of Packwood have been a problematic issue for a number of years. The first step in addressing your problem is to contact your local WDFW Enforcement Officer. They will be very familiar with the issues and will be able to explain the various non-lethal and lethal tools that are available to try to mitigate the problem. Although we don't currently have any special permits that are consistent with your request, we have recommended 40 Master Hunter permits that can be used as needed anywhere in Region 5. After viewing your property and discussing the various options the WDFW Enforcement Officer will be able to determine if those are an appropriate tool to use in your situation.</p>

COMMENTS	AGENCY RESPONSE
<p>Requested Rule Change for the 2012-2014 Seasons: Reestablish the Goose Prairie Unit as a spike and antlerless season for early archery and reinstate the 53 bull permits lost during the 2009 and 2010 adjustments of the three year management plan.</p>	<p>The Goose prairie hunt includes GMUs 352 and 356. There are 50 antlerless archery permits recommended for GMU 352 and 50 antlerless archery permits recommended for GMU 356.</p> <p>Region 3 staff will meet with archery representatives for the 2013 season to determine how additional antlerless opportunity will be proposed if the elk population trends continue.</p> <p>Bull permits for the Goose Prairie hunt are calculated using the special permit allocation formula that was adopted by the Fish and Wildlife Commission in about 1998. Permits are calculated based on the total bull harvest desired (harvest targets), participation rates, and success rates. Although the permits in a number of special permit hunts went up for GMUs associated with the Yakima herd, the number of permits for the Goose Prairie hunt went down slightly for archery and modern firearm and went up slightly for muzzleloader.</p>
<p>Eliminate east/west designation and go to statewide draw system for modern rifle elk. West side elk units in this state are extremely over-populated with hunters and hunt quality is poor. I have hunted Washington state since 1979 as a resident and also out of state and I can honestly say that the elk hunting in other western states is much better, both in quality and success. I and others in my hunting circle are considering only hunting out of state now until this is addressed by a draw system to at least split the number of hunters in half for each unit. The larger units in Washington number between 1000-3000 modern rifle hunters-why not split the numbers in half with an early/late hunt with a weeklong rest period in between these hunts to give the elk a break. Look at the facts: Winston Unit- 2300 hunters, 7% success, Coweeman Unit- 2100 hunters 6% success and Lewis River Unit- 2800 hunters 4% success! Nearby states that have a modern firearm draw system have larger units with half or less the number of modern rifle hunters per individual season and success rates are 15 to 30%! Removing the east/west tag choice alone will not improve success rates or hunt quality unless a draw system is implemented in this state.</p>	<p>The Department has polled Washington elk hunters, several times and they consistently tell us they want to maintain a general season elk hunting opportunity. The hunting seasons that we recommend keep that value in mind and try to maintain the general season opportunity whenever possible.</p>

COMMENTS	AGENCY RESPONSE
<p>I would like to see the elk hunting permit process or opportunity changed. Now when you buy your license and tags you have decide whether you are going to hunt eastern WA or western WA, modern firearm archery or muzzle loader. I would like to see that changed to where you wouldn't have to declare choice of weapon or east or west till after the permit drawing. Thus letting people of the state put in for the special permit opportunities across the entire state without losing opportunity. For example I live in western WA but would like to rifle hunt the quality bulls of eastern WA if I were lucky enough to draw a permit, but if commit to that tag and don't get drawn the best I can hope for is a spike. If the process were changed I would be able to apply for some really great units and not be penalized if I didn't draw because I could then go pickup my western WA archery elk tag before season started. I see it as a win-win for the state and the sportsmen, the state still gets there tag money the people have more options for elk hunting. The state would probably see a jump in the permit application sales</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p>
<p>I need to ask a simple question. Why are there no cow elk permits in the Colockum?? I see you gave some to the rifle hunter and the muzzleloader hunters. I have been waiting for years hoping that we would be able to hunt cows again. What is the reason we are getting shafted?</p>	<p>Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC.</p>
<p>I noticed the WM antlerless elk season for the 550 Coweeman has been shortened by 2 weeks this year. Wondering if this is a miss print since MF season stays the same with 440 permits? So it can't be because of a harvest reduction.</p>	<p>Yes, you are right, this was a typographical error. Thank you for catching the error. A correction has been made in the Recommended Adjustments.</p>
<p>My comments are on the number of proposed elk permits for 2012. I would suggest you LOWER the number of elk permits for the west end of Winston (Toledo) Unit. In the last 3 years there are about 1/3 the elk. I hunt this Unit as I live next to it and I don't want to see all the gone from here. Also, the 3 active cougars working there in the SW section of this Unit, and the number of elk limping--about 1/2--will trim the herds here, too.</p>	<p>There are a number of antlerless special permits recommended for Toledo in the Antlerless, Youth, Senior, and Hunters with Disabilities categories. These hunts are specific to Elk Area 5029 and are designed to mitigate chronic damage problems in that area.</p>
<p>I have worked diligently to participate in this three year planning package on behalf of Goose Prairie archers. I attended the first meeting and raised my questions and concerns about this issue. Subsequently and upon your request, I sent a copy of this request for information and desired action on the issue, to every person involved in the package planning process. I realize that this is a complex process that involves a myriad of issues and participants. I also understand that due to the Governors moratorium the process has been limited in size and over-all scope of the issues. That being said, this is a very important issue to the 1500 archers that utilized this unit for their hunting opportunity prior to the closure.</p>	<p>Bull permits for the Goose Prairie hunt are calculated using the special permit allocation formula that was adopted by the Fish and Wildlife Commission in about 1998. Permits are calculated based on the total bull harvest desired (harvest targets), participation rates, and success rates. Although the permits in a number of special permit hunts went up for GMUs associated with the Yakima herd, the number of permits for the Goose Prairie hunt went down slightly for archery and modern firearm and went up slightly for muzzleloader.</p> <p>The Goose prairie hunt includes GMUs 352 and 356. There are 50 antlerless archery permits recommended for GMU 352 and 50 antlerless archery permits recommended for GMU 356.</p> <p>Region 3 staff will meet with archery representatives for the 2013 season to determine how additional antlerless opportunity will be proposed if the elk population trends continue.</p>

COMMENTS	AGENCY RESPONSE
<p>I'm a MH and I am against the no restrictions on special elk hunt apps not having to be region specific. If you buy an east tag than you should hunt in the east and same for west. If you want to remove that fact than remove it all together, allow anyone to hunt anywhere with just a "state" elk tag.....no east or west designation. I became a MH for several reasons, the main one being to promote hunters in a "better light" to the non-hunting citizens of the state. To help protect the wildlife and the public and private lands of the state. But now with the changing rules to allow general hunters more access and taking away from MH the "perks" of the work involved to become a MH is wrong. Where is the incentive to become a MH and to promote the policies of the MH program if the general hunters get the same or very close to the same "perks"? I have to admit, the better hunting opportunities was a factor in getting me to become a MH. But it isn't the only one. Sometimes political correctness has to stop. The goal of the MH is to promote more people into the program and helping its causes..... Taking away incentives doesn't do that. If there are areas needing to decrease elk populations than make special permits for MH's, you can also give a few extra to the general hunters but promote the MH's first. We did the work to join the cause, not just ride the coat tails of others.</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p> <p>The MH program is very important to the Department. What we have found however, is that some hunters were mainly motivated to join the program because of the hunts. We are looking to strengthen the program with hunters more motivated to giving back; retention of our hunting heritage; and improving landowner relations.</p> <p>Therefore the types of incentives used to motivate hunter's to be part of the MH program need to be re-aligned with that philosophy. It was never the intent to trade special hunting opportunities for volunteer work.</p>
<p>In regards to deer and elk hunting: I would like to see changes made to allow hunters to purchase a tag for the species to be hunted and then the hunter is allowed to hunt by any means (archery, muzzleloader, modern rifle) until the tag is filled. I am aware that you have a limited number of special permits to allow this but the cost is prohibitive. Why not manage the species and not the hunter? California manages their wildlife and hunting seasons in this manner</p>	<p>You are correct, the multiple season permits already provide what you are requesting. Because they are highly valued it also provides a source of revenue for the Department. Although the price at \$180.50 is somewhat high, with a little advance planning most interested hunters seem to be able to budget for the cost. You have until March 31 to apply for multiple season permits.</p>
<p>It is my understanding that the rules for hunting are about to be finalized. In reference to Elk Hunting I was wondering why the WDFW doesn't allow a hunter to purchase as many Special Permits, both eastside and westside as they wish and after the drawing results the hunter would then be required to purchase either an eastside or westside license/tag depending on their drawing results. I believe this would generate more funds for special permits and still have the same outcome. If I wasn't drawn for a special permit I would like to hunt early archery westside and late archery eastside, so removing the eastside/westside requirement would be my preference.</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p>
<p>I'll be hunting more in Idaho and paying 250/275 per tag to hunt big bulls and any deer using any weapon, and paying 250 for my hunting license .But Washington state could offer me the same deal and special hunts like Hanford big bulls, and bring in the money instead of other states.</p>	<p>The multiple season permits already provide what you are requesting for deer. Although the price at \$180.50 is somewhat high, with a little advance planning most interested hunters seem to be able to budget for the cost. You have until March 31 to apply for multiple season permits.</p> <p>It has been the intent of the Department for a number of years to facilitate an elk hunting season on the Arid Lands Ecology Reserve. We are still pursuing that outcome.</p>

COMMENTS	AGENCY RESPONSE
<p>I just wanted to give you my opinion on one of your proposals for the next hunting period. I am firmly against the idea of allowing west side elk tag holders to apply for east side special permits. The new draw system was designed to improve hunter odds of drawing a permit, if this change goes through the odds will dramatically go way down. An example is what I apply for, east side muzzy in the Tucannon and Wenaha. Currently there is an average of 101 people putting in for 3 or 2 tags, if you allow the guys who just buy Westside permit apps to apply I can imagine the number of applicants could go up to at least 500 or more. I've been applying for years and that's with now up to 16 points, with the flood of guys who will add to the pool. There is very little chance of drawing before I turn 100 years old. Please don't let this go through this year or ever. Thanks for reading our comments.</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p>
<p>Is there any truth to the rumors I'm hearing that in a year or two Margaret will be made a general area? If so, that is such a mistake. keep it a permit only area, if the numbers are getting to big increase the number of bull tags, you already have a lot of cow tags in that area, between bow, muzzleloader, and rifle. We need a few areas that we can still find nice bulls in without fighting thousands of hunters for a spot to sit and watch a clearing. I am 64 and a disabled hunter, I have tried Winston creek area for a few years, but the number of hunters is alarming. If they open Margaret unit, all at once there will be massive amounts of hunters, probably over 2000 to 3000 all at once shooting bull all over and someone will get shot, in the process. I must not be the only person with concerns, please respond with something disproving or confirming rumors I have heard. Thank you.</p>	<p>The Department receives a number of requests every year to open both the Margaret and the Toutle units to general season hunting opportunity.</p> <p>Although there have been some discussions, the Department is not recommending such a change at this time.</p> <p>A major change like shifting the Margaret unit to a general season elk hunting opportunity would require multiple public meetings and a great deal of public involvement before a final recommendation could be developed.</p>
<p>After reviewing the new proposals to the hunting seasons and permits, I noticed that the antlerless season for the 550 unit for ELK muzzle loader will only run from Nov 21 to Nov30 for the next three years. Is this a mistake or is it planned? If it is planned I can see why all the cow tags for that unit last year. NOT A VERY GOOD CHOICE.</p> <p>Also I noticed the planned season for 2013 and 2014 for the same area. 550 Late muzzleloader is only going to be 2.5 weeks. Why not do like the last times Thanksgiving fell on the last week in Nov? Start season a week ahead.</p> <p>I believe these proposals need to be rethought and re-edited.</p>	<p>Yes, you are right, this was a typographical error. Thank you for catching the error. A correction has been made in the Recommended Adjustments.</p> <p>In the last three years and the coming three years for GMUs 550, the late muzzleloader season shifts with the calendar and the Thanksgiving holiday. The opener is the Wednesday before Thanksgiving and the closer is always Dec. 15. Hopefully within that 2 ½ week time period which encompasses the Thanksgiving holiday you will be able to schedule some muzzleloader elk hunting.</p>
<p>I support making a change for the special permits. The special permits are designed for a quality hunting opportunity. I live on the west side but want an east side quality hunt. Something always has to give. The area I hunt or the permit opportunity. Please make this change</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p>

COMMENTS	AGENCY RESPONSE
<p>I strongly oppose changing the regulation that requires hunters to apply to only special elk permits that is consistent with their elk transport tags. Changing this regulation would mean that the best units east and west would have a huge increase in the number of applicants. It is hard enough to draw these units. It seems that the only purpose to change this regulation is to get more money from the application process.</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p>
<p>Please allow Elk tags to be used East OR West, not one or the other. Thanks.</p>	<p>At the public meetings that were conducted this summer, as well as follow up surveys that the Department conducted, elk hunters were evenly split on whether the current system should be retained. Elk hunters that were opposed to a change expressed concerns about the potential for increased crowding and concerns about the potential for the odds of drawing special permits deteriorating. There wasn't enough support for changing the system to move forward with a recommendation to the Fish and Wildlife Commission.</p>
<p>You need to rethink the quality elk hunt in unit 368 for the muzzle loaders. Currently you have the season set during the cattle roundup for the federal land. There are many of the ranchers with their dogs and horses in all of the areas that the elk are in, they round up cattle almost all of the first part of the muzzle season. I know you are working to provide the best hunting for everyone but it doesn't work for the hunters with the ranchers out trying to get there cows in.</p>	<p>The Department has no control over the timing of cattle movement on federal lands. The muzzleloader bull permits in this Region have been the 1st week of October since the inception of bull permits in the mid 1990's. This is the first complaint about the timing of cattle conflicting with elk hunting. Elk move for various reasons. Most of the telemetry work done on the Yakima elk herd shows movement that coincides with the start of hunting seasons. The elk do not go far. Muzzleloader hunters have generally had good success rates over the last decade.</p>
<p>I waited 12 years to get a cow tag for the Margaret GMU. When I finally got it last year, the place was DOA because of the hunt season lasting about 5 months out of the year. There is a balance between fair rules for permit hunting and deriving revenue for the state. The best place in the Margaret was closed except for "buddies with keys to the gate" because it is now the Noble Tree Farm. Please find a better way to make the wait for a quality hunt worth it. Thanks in advance.</p>	<p>The Region 5 personnel are aware of the access issues that have developed in the Margaret unit when key pieces of real estate changed hands. They will continue to work on best options in an attempt to maintain the quality of the hunt.</p>
<p>I would like the board to consider adding and antlerless elk special permit for the 328,329,335 GMU. They have added 40 permits for Modern Firearm, but not included any for archery. Please add special permits for archery hunters for this hunt.</p>	<p>Regional staff's recommendation for antlerless opportunity in the late archery general season is for GMUs 328, 334, and 335. There are also 50 antlerless, special permits for archery in GMUs 328 and 329 for the early archery time period. See the special permit WAC.</p>
<p>The options for muzzleloaders are very limited on the east side of the state. It would be beneficial if more options/opportunities were added, such as special tags for cow elk in the Tucannon unit.</p>	<p>We will take that request under advisement and see if there is any room for that kind of opportunity in the future.</p>

COMMENTS	AGENCY RESPONSE
<p>I read a negative piece about the cow elk late hunt in the Longview paper. I agree with the decisions made by the WDOFAW because hopefully you folks have all the info and the cow elk hunt was necessary.</p> <p>I was able to harvest my first elk in many years of hunting for I am disabled and 71 years old. It was good that the lumber company left many of the gates open to help harvest the animals.</p> <p>My thoughts are if you had that hunt or hunts like that for disabled and hunters over the age of 65 you would less grief from the general public and it sure would help the old and crippled guy like myself have a pretty good hunt</p> <p>Thanks for listening and if this is the wrong place to send this email can you please forward it on to the proper folks</p>	<p>Thank you for the supportive comments. The Department does try to recommend opportunity for hunters with disabilities, senior hunters, and youth hunters whenever possible. We will continue to look for those opportunities in your area.</p>
<p>In order to maximize the opportunities of the Washington State elk hunter and also maintain the financial posture to manage our herds, I would strongly recommend that the hunter be able to, at purchase, declare east or west (as we do now) and at that time have the opportunity to add the opposite state portion to the tag for an additional 50% of the original elk tag cost.</p> <p>This is of tremendous importance for locations such as Packwood and Randle, where for example, the Bumping unit is easy to access from the west but opposite the east west line. Increasing the available land mass for those who choose to purchase the option would be an outstanding win for all demographics and the wildlife economy.</p> <p>If there is something I'm missing, such as fear of high hunter densities in the central cascades, I posit that the increased cost would maintain the balance while increasing funding for the future of the hunt.</p>	<p>The multiple season permits already provide what you are requesting. Because they are highly valued it also provides a source of revenue for the Department. Although the price at \$180.50 is somewhat higher than you recommend, with a little advance planning most interested hunters seem to be able to budget for the cost. You have until March 31 to apply for multiple season permits.</p>
<p>Stop these late cow hunts, it's no sport and darn near criminal. Fair chase what a crock. These animals are hungry and are vulnerable this late in the year. There is NO overabundance of elk in the units you are targeting. NO winter kill except for the area you mismanaged for decades and have kept closed up in the Toutle Valley to Coldwater. Leave the Coweeman, Ryderwood cows alone. Give more permits during regular seasons, not late Dec - Jan</p>	<p>Not quite sure if you want us to leave the elk alone or harvest more during the general season. The Department is trying to reduce the Mount St. Helens elk herd and all of our survey information from the 5 core GMUs suggest there are still more elk than the landscape can support. Some of the later antlerless permits are in response to complaints of too much crowding during the general season.</p>
<p>Reduce the number of cow elk permits in the Winston unit. A total of 570 cow permits (including the Toledo elk area) is absolutely ridiculous for a unit the size of the Winston. I have seen the decline in the unit; having hunted it since 2000. I no longer hunt the unit due to the lack of elk and extreme pressure which results in a very poor hunting experience; and for the record I typically travel seven to twelve miles in behind closed gates on a mountain bike before I start hunting in the morning. Only allow archers to harvest cow elk in the late season. If a heard in a particular unit is over capacity extend the archery season or issue more modern and muzzleloader tags later in the year.</p>	<p>The Department is trying to reduce the Mount St. Helens elk herd and all of our survey information from the 5 core GMUs, including the Winston Unit, suggest there are still more elk than the landscape can support. Some of the later antlerless permits are in response to complaints of too much crowding during the general season.</p>