



## PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with RCW 34.05.330, the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at <http://apps.leg.wa.gov/wac/default.aspx?cite=82-05>.

### CONTACT INFORMATION *(please type or print)*

Petitioner's Name Brad Thomsen

Name of Organization \_\_\_\_\_

Mailing Address \_\_\_\_\_

City Edmonds State WA Zip Code 98020

Telephone \_\_\_\_\_ Email \_\_\_\_\_

### COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClist.htm>.

### INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: WDFW

☒ 1. NEW RULE - I am requesting the agency to adopt a new rule.

☒ The subject (or purpose) of this rule is: Please See Attached

☒ The rule is needed because: Please See Attached

☒ The new rule would affect the following people or groups: Please See Attached

☐ **2. AMEND RULE - I am requesting the agency to change an existing rule.**

List rule number (WAC), if known: \_\_\_\_\_

☐ I am requesting the following change: \_\_\_\_\_

☐ This change is needed because: \_\_\_\_\_

☐ The effect of this rule change will be: \_\_\_\_\_

☐ The rule is not clearly or simply stated: \_\_\_\_\_

☐ **3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.**

List rule number (WAC), if known: \_\_\_\_\_

*(Check one or more boxes)*

☐ It does not do what it was intended to do.

☐ It is no longer needed because: \_\_\_\_\_

☐ It imposes unreasonable costs: \_\_\_\_\_

☐ The agency has no authority to make this rule: \_\_\_\_\_

☐ It is applied differently to public and private parties: \_\_\_\_\_

☐ It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: \_\_\_\_\_

☐ It duplicates another federal, state or local law or rule. List duplicate law or rule, if known: \_\_\_\_\_

☐ Other (please explain): \_\_\_\_\_

**Sent via Email to:**

[rules.coordinator@dfw.wa.gov](mailto:rules.coordinator@dfw.wa.gov)

[commission@dfw.wa.gov](mailto:commission@dfw.wa.gov)

[Kelly.Susewind@dfw.wa.gov](mailto:Kelly.Susewind@dfw.wa.gov)

June 13th, 2025

Rules Coordinator  
Washington Department of Fish and Wildlife  
P.O. Box 43200  
Olympia, WA 98504-3200

Washington Fish & Wildlife Commission  
600 Capitol Way N.  
Olympia, WA 98501

Director Kelly Susewind  
Washington Department of Fish and Wildlife  
600 Capitol Way N.  
Olympia, WA 98501

Director Susewind, Commissioners, and WDFW Rules Coordinator:

**In accordance with RCW 34.05.330, please accept this petition asking the Washington State Department of Fish & Wildlife to begin rulemaking for the RETURN of the Washington State Spring Black Bear Hunting Season;**

Please find attached the following articles with links to the full webpages;

Article date: June 13, 2025

**Washington State's "Fanatical Four"**

**The Sportmens's Alliance Exposes Violations by Washington Fish and Wildlife Commissioners.**

**NEW WEBPAGE DOCUMENTS COMMUNICATIONS OF COMMISSIONERS' OUTRAGEOUS CONDUCT**

<https://sportsmensalliance.org/news/exposing-washington-fish-and-wildlife-commissioner-violations/>

**Washington State Evidence**

**UNCOVERING COLLUSION AND MALFEASANCE AMONG THE  
WASHINGTON FISH AND WILDLIFE COMMISSION**

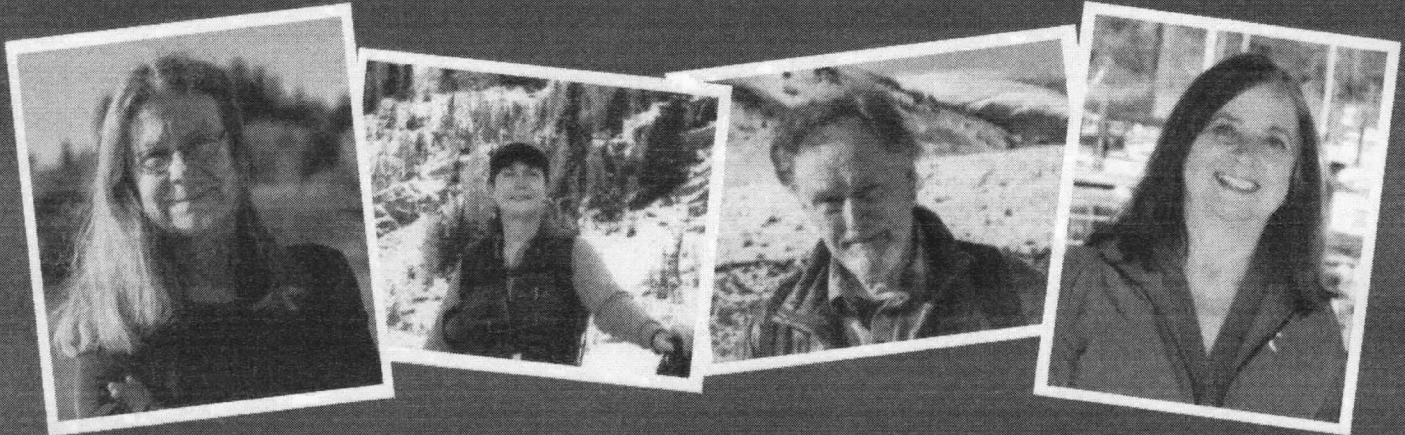
<https://sportsmensalliance.org/evidence-against-washington-fish-and-wildlife-commission/>

In accordance with RCW 34.05.330, please accept this petition asking the Washington State Department of Fish & Wildlife to begin rulemaking for the RETURN of the Washington State Spring Black Bear Hunting Season.

Thank-you

Sportsmen's Alliance

# Washington State's



## "Fanatical Four"

June 13, 2025

### **The Sportsmen's Alliance Exposes Violations by Washington Fish and Wildlife Commissioners**

**NEW WEBPAGE DOCUMENTS EMAIL COMMUNICATIONS OF  
COMMISSIONERS' OUTRAGEOUS CONDUCT**

On May 30, the Washington Department of Fish and Wildlife fulfilled its final installment of records due to the Sportsmen's Alliance from a September 2023 public records request concerning the communications of four state fish and wildlife commissioners. Though the total number of records received was just a fraction of the 477,000 identified, the Sportsmen's Alliance has been astounded at what they have uncovered so far – and now the watchdog organization is sharing that information with the public (<https://sportsmensalliance.org/evidence-against-washington-fish-and-wildlife-commission/>).

"Violations of open meetings laws are rampant. Collusion with animal extremists on policy matters. Exclusion of tribal co-managers on matters which they're legally bound to consult. It's all here and the level of disregard for the law and citizens is outrageous," said Todd Adkins, Senior Vice President of Sportsmen's Alliance. "Washington residents deserve transparent government decision-making, not backroom deals catering

to and promoting a fringe belief system.”

While the Sportsmen's Alliance will continue to dig through the tens of thousands of unearthed records, they have launched a webpage (<https://sportsmensalliance.org/evidence-against-washington-fish-and-wildlife-commission/>) to highlight examples of egregious violations.

“You’re going to want to bookmark this page as everything we documented in our petition to Gov. Ferguson and on social media has been indexed here, and new documents will be revealed as we find them,” said Brian Lynn, Sportsmen's Alliance Vice President of Marketing and Communications. “As a resident of the state, it’s important for Washington citizens to see just how underhanded these commissioners conduct business.”

**VIEW THE EVIDENCE ([HTTPS://SPORTSMENSALLIANCE.ORG/EVIDENCE-AGAINST-WASHINGTON-FISH-AND-WILDLIFE-COMMISSION/](https://sportsmensalliance.org/evidence-against-washington-fish-and-wildlife-commission/))**

The webpage contains videos explaining how commissioners attempted to circumvent the law ([https://youtu.be/\\_KE6\\_Eeu8A8](https://youtu.be/_KE6_Eeu8A8)), how they promised anti-hunters that they would “get to” duck hunting (<https://youtu.be/FvDroQDCQkY>) and how they colluded with extreme animal-rights organizations to shape policy in Washington (<https://youtu.be/9HAhWGCIBMc>).

On May 16, the Sportsmen's Alliance formally petitioned newly elected Gov. Ferguson (<https://sportsmensalliance.org/news/saf-petitions-washington-governor-for-removal-of-commissioners/>) for the removal of Commissioners Barbara Baker, Lorna Smith, Melanie Rowland and John Lehmkuhl based upon a portion of the illegal activities found in emails turned over after the organization filed a lawsuit compelling their release (<https://sportsmensalliance.org/news/sportsmens-alliance-sues-washington-fish-and-wildlife-for-delay-on-public-records/>).

“The hubris of these four commissioners is jaw dropping. Their contempt for the public and laws of Washington should scare anyone interested in open, transparent government,” said Adkins. “This is just the beginning. The Sportsmen's Alliance promised to fight for the state’s hunters, anglers and citizens, and that’s exactly what we plan to do.”

**VIEW THE EVIDENCE ([HTTPS://SPORTSMENSALLIANCE.ORG/EVIDENCE-AGAINST-WASHINGTON-FISH-AND-WILDLIFE-COMMISSION/](https://sportsmensalliance.org/evidence-against-washington-fish-and-wildlife-commission/))**

***The Sportsmen's Alliance guarantees hunting, fishing and trapping for the American sportsman now and forever. We're there when sportsmen need us most. We are the only organization specifically created to protect the individual hunter, angler, and trapper – no matter the threat. We will never compromise when it comes to defending our way of life in the courts, in the legislatures, in the public square and at the ballot box. We make this promise to the American sportsman: we will never give up and never give in while proudly securing our future against those seeking to destroy our values, beliefs, and traditions. Stay connected to Sportsmen's Alliance: Online (<https://sportsmensalliance.org/>), Facebook (<https://www.facebook.com/sportsmensalliance>), Twitter ([https://x.com/i/flow/login?redirect\\_after\\_login=%2Fsportsmensall](https://x.com/i/flow/login?redirect_after_login=%2Fsportsmensall)) and Instagram (<https://www.instagram.com/sportsmensall/>).***

## RELATED POSTS

**Washington Update: Lorna Smith Appeals Loss to Supreme Court (<https://sportsmensalliance.org/news/washington-update-lorna-smith-appeals-loss-to-supreme-court/>)**



**Sportsmen's Alliance****Washington State Evidence****UNCOVERING COLLUSION AND MALFEASANCE AMONG THE WASHINGTON FISH AND WILDLIFE COMMISSION**

Members of the Washington Fish and Wildlife Commission have worked behind the scenes, and in violation of state laws, to end regulated, scientific wildlife management and to replace it with an extreme animal-rights agenda.

**Video Walk Through of Evidence****"Daisy Chain" Emails**

Violations of Open Meeting Laws

**Colluding Commissioners**

Working with Extremists Behind the Scenes

**Promises to Activists**

Not Just Bears: Going After Sea Duck Hunting

**Documentation: News Stories and Social Media Posts**

**THE STORIES AND EVIDENCE RELATED TO OUR PUBLIC RECORDS REQUESTS, THE NECESSARY LAWSUIT TO ACQUIRE THOSE RECORDS AND THE RESULTING PROOF OF COLLUSION, CORRUPTION AND LEGAL VIOLATIONS OF WASHINGTON STATE LAW.**

We're making public important records that show how four commissioners serving on the Washington Fish and Wildlife Commission have circumvented open-meeting laws in violation of state law, colluded to end hunting opportunities based not on science presented by Washington Department of Fish and Wildlife biologists but on their own opinions and personal beliefs, and how they have done so by excluding legally bound tribal co-managers and the public. These commissioners have worked in lockstep with extreme animal activists and organizations to destroy hunting, fishing and scientific wildlife management in the state of Washington — and they've flouted the law at every step. With the evidence the Sportsmen's Alliance has handed Governor Bob Ferguson, he has the authority to, and should, remove these commissioners immediately. The Sportsmen's Alliance will continue to pull back the veil of government secrecy by releasing evidence of malfeasance and illegal activity committed by these commissioners.

**THE PETITION AND EVIDENCE**

Read our petition and supporting evidence that justifies removal of commissioners Barbara Baker, Lorna Smith, Melanie Rowland and John Lehmkuhl, each of whom have violated multiple state laws

and their legal mandate to maximize hunting and fishing opportunities.

**READ THE FULL STORY ([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/SAF-PETITIONS-WASHINGTON-GOVERNOR-FOR-REMOVAL-OF-COMMISSIONERS/](https://sportsmensalliance.org/news/saf-petitions-washington-governor-for-removal-of-commissioners/))**

**READ OUR LEGAL PETITION ([HTTPS://SPORTSMENSALLIANCE.ORG/WP-CONTENT/UPLOADS/2025/05/WA\\_COMMISSIONER\\_REMOVAL\\_PETITION\\_FERGUSON\\_SAF\\_FINAL.PDF](https://sportsmensalliance.org/wp-content/uploads/2025/05/WA_COMMISSIONER_REMOVAL_PETITION_FERGUSON_SAF_FINAL.PDF))**

**PETITION FILED:  
REMOVE CORRUPT  
WASHINGTON COMMISSIONERS**

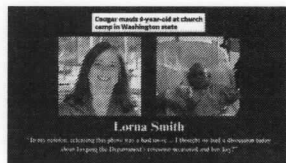


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DOCUMENT 6 » DOCUMENT 7 » DOCUMENT 8 » DOCUMENT 9 » DOCUMENT 10 »  
DOCUMENT 11 » DOCUMENT 12 » DOCUMENT 13 » DOCUMENT 14 » DOCUMENT 15 »  
DOCUMENT 16 » DOCUMENT 17 » DOCUMENT 18 » DOCUMENT 19 » DOCUMENT 20 »  
DOCUMENT 21 » DOCUMENT 22 » DOCUMENT 23 » DOCUMENT 24 » DOCUMENT 25 »  
DOCUMENT 26 » DOCUMENT 27 » DOCUMENT 28 » DOCUMENT 29 » DOCUMENT 30 »  
DOCUMENT 31 » DOCUMENT 32 » DOCUMENT 33 » DOCUMENT 34 » DOCUMENT 35 »

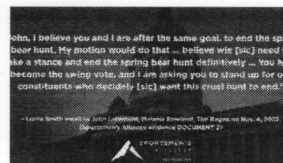
## Evidence: Social Media Posts



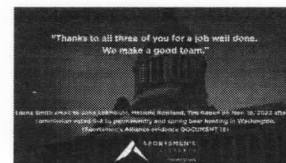
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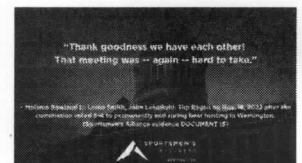
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(<https://sportsmensalliance.org/wp-content/uploads/2025/05/Document-15.pdf>)



(<https://sportsmensalliance.org/wp-content/uploads/2025/05/Document-15.pdf>)

**Victim Blaming Girl  
Attacked by Cougar**

(<https://sportsmensalliance.org/wp-content/uploads/2025/06/Document-300.pdf>)

Lorna Smith Email

DOCUMENT 300 »

**Scolding WDFW for  
Releasing Facts**

(<https://sportsmensalliance.org/wp-content/uploads/2025/06/Document-301.pdf>)

Lorna Smith Email

DOCUMENT 301 »

**How to Stop Spring  
Bear Season**

(<https://sportsmensalliance.org/wp-content/uploads/2025/05/Document-2.pdf>)

Lorna Smith Email

DOCUMENT 2 »

**Congrats on  
Canceling Spring  
Bear Season**

(<https://sportsmensalliance.org/wp-content/uploads/2025/05/Document-15.pdf>)

Lorna Smith Email

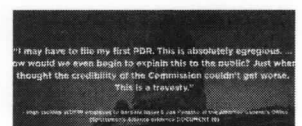
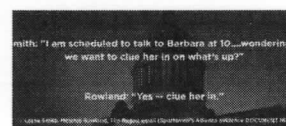
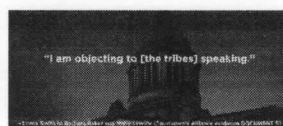
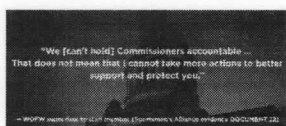
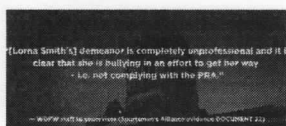
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**Thankful for  
Teamwork!**

(<https://sportsmensalliance.org/wp-content/uploads/2025/05/Document-15.pdf>)

Melanie Rowland Email

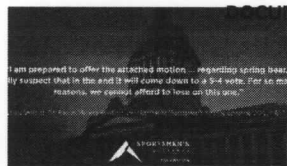
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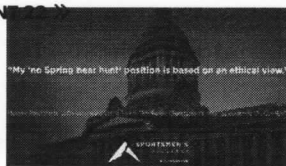


				
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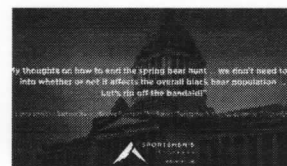
<b>Lorna Smith Bullying</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-22.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-22.pdf</a> )	<b>Unaccountable Co-conspirators</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-22.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-22.pdf</a> )	<b>Excluding Tribes</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-5-1.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-5-1.pdf</a> )	<b>Collusion</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-16.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-16.pdf</a> )	<b>Commission Credibility</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-19.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-19.pdf</a> )
WDFW Staff Email to Supervisor	WDFW Supervisor Response to Staff	Lorna Smith Email	Lorna Smith Email	WDFW Employee Email
DOCUMENT 22 >>		DOCUMENT 5 >>	DOCUMENT 16 >>	DOCUMENT 19 >>



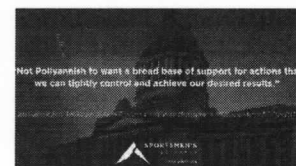
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<b>Motion to End Spring Bear</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-2.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-2.pdf</a> )	<b>Personal Ethics Over Science</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-4.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-4.pdf</a> )	<b>Data Doesn't Matter, End Spring Bear Now!</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-3.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-3.pdf</a> )	<b>Achieve Desired Results</b> ( <a href="https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-4.pdf">https://sportsmensalliance.org/wp-content/uploads/2025/05/DOCUMENT-4.pdf</a> )
Lorna Smith Email	Melanie Rowland Email	Lorna Smith Email	John Lehmkuhl Email
DOCUMENT 2 >>	DOCUMENT 4 >>	DOCUMENT 3 >>	DOCUMENT 4 >>

FOLLOW SPORTSMEN'S ALLIANCE ON FACEBOOK ([HTTPS://WWW.FACEBOOK.COM/SPORTSMENSALLIANCE/](https://www.facebook.com/sportsmensalliance/))

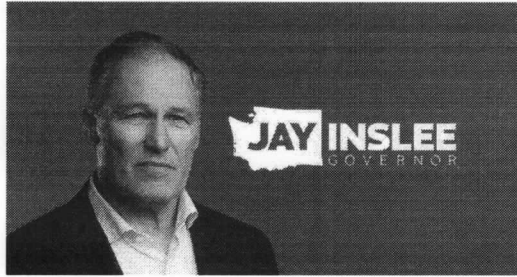
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FOLLOW SPORTSMEN'S ALLIANCE ON X ([HTTPS://WWW.TWITTER.COM/#!/SPORTSMENSALL](https://www.twitter.com/#!/SPORTSMENSALL))

## News Stories and Documentation

DIGGING DEEPER: SPORTSMEN'S ALLIANCE SUBMITS ADDITIONAL

## DIGGING DEEPER: SPORTSMEN'S ALLIANCE SUBMITS ADDITIONAL RECORD REQUESTS TO WDFW



After discovering blatant disregard for state law and open disdain for the tribes and citizens of Washington, the Sportsmen's Alliance wanted to know how high the corruption in the state went — so we submitted additional public records requests for communications that took place between former Governor Jay Inslee and Washington Department of Fish and Wildlife staff. We specifically asked for communications concerning wolves, bears, cougars and what would have been the fanatical four commissioners' coup d'état, so-called "Conservation Policy" that would have defined the term 'conservation' and set future working parameters for the fish and wildlife department.

**READ THE FULL STORY ([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/SPORTSMENS-ALLIANCE-SUBMITS-ADDITIONAL-RECORD-REQUESTS-TO-WDFW/](https://sportsmensalliance.org/news/sportsmens-alliance-submits-additional-record-requests-to-wdfw/))**

## BEAR, COUGAR REGS BY WASHINGTON'S GAME COMMISSION UNNECESSARY, LIKELY ILLEGAL



When the fanatical four anti-hunting commissioners continued their quest to protect predators at the behest of extreme animal-activist organizations, the Sportsmen's Alliance submitted official comments rebutting their newly adopted policy that further restricted bear and cougar hunting.

**READ THE FULL STORY ([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/BEAR-COUGAR-REGS-BY-WASHINGTONS-GAME-COMMISSION-UNNECESSARY-LIKELY-ILLEGAL/](https://sportsmensalliance.org/news/bear-cougar-regs-by-washingtons-game-commission-unnecessary-likely-illegal/))**

**READ OUR COUGAR COMMENTS » READ OUR BEAR COMMENTS »**

**HOW THE COMMISSIONERS ADVOCATED FOR EXTREMISTS »**

**PETITION ASKS WDFW COMMISSION TO REVERSE BEAR, COUGAR HUNTING RULE CHANGES »**

**READ THE RADICAL PETITION ADOPTED BY THE COMMISSION »**

## SPORTSMEN'S ALLIANCE SUES WASHINGTON FISH AND WILDLIFE FOR DELAY ON PUBLIC RECORDS



When we submitted public records requests to the Department of Fish and Wildlife for the communications of Barbara Baker, Lorna Smith, Melanie Rowland and John Lehmkuhl, the state identified more than 477,000 responsive records. After more than 15 months, we had received around a dozen records. This slow walking of a legal obligation was completely unacceptable, so the Sportsmen's Alliance sued the Washington Department of Fish and Wildlife to compel the release of requested documents.

**READ THE FULL STORY ([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/SPORTSMENS-ALLIANCE-SUES-WASHINGTON-FISH-AND-WILDLIFE-FOR-DELAY-ON-PUBLIC-RECORDS/](https://sportsmensalliance.org/news/sportsmens-alliance-sues-washington-fish-and-wildlife-for-delay-on-public-records/))**

**READ THE COMPLAINT »**

## SPORTSMEN'S ALLIANCE WINS CASE IN WASHINGTON SUPREME COURT

Despite the Sportsmen's Alliance filing a lawsuit against Commissioner Lorna Smith personally for



simultaneously holding two appointive offices, the Washington Attorney General's Office defended her in Thurston County Superior Court and then continued wasting taxpayer dollars by appealing the eventual loss to the Washington Supreme Court. Ultimately, the highest state court agreed with the Sportsmen's Alliance and Commissioner Smith was forced to resign one of the offices. She chose to step down from her Jefferson County Planning Commission position, later claiming to news outlets she was thinking about resigning anyway (<https://capitalpress.com/2024/10/18/sportsmen-group-scores-win-from-washington-supreme-court/>).

**READ THE FULL STORY ([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/SPORTSMENS-ALLIANCE-WINS-CASE-IN-WASHINGTON-SUPREME-COURT/](https://sportsmensalliance.org/news/sportsmens-alliance-wins-case-in-washington-supreme-court/))**

**READ THE SUPREME COURT RULING » READ THE SUPERIOR COURT RULING »**

**READ GOV. INSLEE'S ATTEMPT TO PROTECT SMITH » READ LORNA SMITH'S RESIGNATION LETTER »**

**READ OUR LEGAL COMPLAINT »**

## **SPORTSMEN'S ALLIANCE COMMENTS ON WASHINGTON'S GRAY WOLF REVIEW**



With the commission historically disregarding wildlife management science when it didn't fit their agenda, the Sportsmen's Alliance commented in support of Washington Fish and Wildlife Department biologists and staff who recommended downlisting wolves from "endangered" to "sensitive" throughout the state. Of course, the commission rejected the recommendation despite hard data proving wolf populations were stable, growing and expanding their range.

**READ THE FULL STORY ([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/WASHINGTON-SA-SUBMITS-COMMENTS-ON-GRAY-WOLF-REVIEW/](https://sportsmensalliance.org/news/washington-sa-submits-comments-on-gray-wolf-review/))**

**READ OUR COMMENTS » HOW GOV. INSLEE INTERFERED WITH THE COMMISSION »**

## **SPORTSMEN'S ALLIANCE COMMENTS ON WASHINGTON'S ILLICIT 'CONSERVATION POLICY'**



When the Washington Fish and Wildlife Commission kept running up against resistance to their radical management changes and their legal mandate to maximize hunting and fishing, they sought to circumnavigate the intent of the state's legislature by defining 'conservation' with loaded language and nebulous concepts, which could be used to undermine established wildlife management and scientific data in favor of any whim the commission desired. The policy would have guided the department's actions, science and priorities going forward.

**READ OUR 'CONSERVATION POLICY' COMMENTS  
([HTTPS://SPORTSMENSALLIANCE.ORG/NEWS/SPORTSMENS-ALLIANCE-COMMENTS-ON-WASHINGTONS-ILLICIT-CONSERVATION-POLICY/](https://sportsmensalliance.org/news/sportsmens-alliance-comments-on-washingtons-illit-conservation-policy/))**

**COMMISSIONER SMITH LEADS CONSERVATION POLICY DISCUSSION »**

**CONTROVERSIAL CONSERVATION POLICY HEADED TO GALLOWES? »**

**HOW WASHINGTON TRIBES HALTED THE CONSERVATION POLICY »**