



# 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 Thomssen

Name of Organization [Redacted]

City Edmonds State WA Zip Code 98020

Telephone 425-890-4499 Email brad@bradthomssen.com

### 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): \_\_\_\_\_

JAN 28 2025  
**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)

November 1st, 2024

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 a Spring Black Bear Hunting Season.**

January 28, 2025;

**Sportsmen's Alliance Sues Washington Fish and Wildlife for Delay on Public Records**

The news article is attached to this petition as well as an online link to the original article here;

<https://sportsmensalliance.org/news/sportsmens-alliance-sues-washington-fish-and-wildlife-for-delay-on-public-records/>

Much of the the article discusses issues surrounding the cancellation of the Washington State Spring Bear Hunting Season by the WDFW Commission.

The article goes on describing WDFW failing to compile and release requested records to Sportsmen's Alliance in a reasonable time and discussing how this has happened.

There is a lot to unpack in the lawsuit filed today.

WDFW may hide behind not commenting regarding on-going litigation involving the Department in the Staff Summary to this Petition.

That's OK.

What is not ok is WDFW failing to provide the requested relevant documents to Sportsmen's Alliance as per the Washington State Public Records Act.

The records requested regarding the cancellation of the Washington State Spring Bear Hunting Season and all records relevant to the Sportsmen's Alliance lawsuit need to be disclosed as requested.

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

Thank-you

## Sportsmen's Alliance



## Sportsmen's Alliance Sues Washington Fish and Wildlife for Delay on Public Records

January 28, 2025

### ***Washington Fish and Wildlife Slow-Walks Public Records Request for 16 Months***

Today, Jan. 28, the Sportsmen's Alliance Foundation sued the Washington Department of Fish and Wildlife ([https://sportsmensalliance.org/wp-content/uploads/2025/01/SAFvWDFW\\_01\\_28\\_25.pdf](https://sportsmensalliance.org/wp-content/uploads/2025/01/SAFvWDFW_01_28_25.pdf)) in state superior court for the department's withholding of public records in violation of the state's public records act (PRA). The Sportsmen's Alliance initially sought public records in September 2023 pertaining to the business of the Washington Fish and Wildlife Commission, and the department has yet to deliver even a tiny fraction of the documents it identified as relevant to the Sportsmen's Alliance's request.

"Over 500 days have passed, and we've received less than 0.01% of the documents the department identified as relevant to our request," said Dr. Todd Adkins, Senior Vice President at the Sportsmen's Alliance. "Instead, we've been consistently strung along, with delivery promised by ever-extending deadlines. Which begs the question: what is the agency hiding? It's no wonder the state's sportsmen and women have little confidence in this process."

On November 18, 2022, the Washington Fish and Wildlife Commission held a meeting at which it voted to cancel spring bear hunts. The vote came as a surprise to the Sportsmen's Alliance and Washington hunters, as the meeting's agenda gave no indication that a cancellation vote

came as a surprise to the Sportsmen's Alliance and Washington hunters, as the meeting's agenda gave no indication that a cancellation vote would be considered by the commission. Ultimately, spring bear hunting in Washington was canceled (<https://sportsmensalliance.org/news/extremists-attack-washington-bear-lion-hunting-again/>) without providing sportsmen the opportunity to provide meaningful comments.

## **We are asking the court to compel the release of the public records we've lawfully requested in order to hold the commission accountable for any statutory missteps it may have taken.**

— MICHAEL JEAN, Litigation Counsel, Sportsmen's Alliance Foundation

The Sportsmen's Alliance suspected that members of the commission (<https://sportsmensalliance.org/news/sportsmens-alliance-wins-case-in-washington-supreme-court/>) had violated open public meeting laws that would have allowed members of the public, including the Sportsmen's Alliance and its members, to know that such a momentous vote was about to happen. The surprise vote raised concerns that members of the commission had routinely engaged in private communications among themselves concerning commission activities, meetings and votes. In order to investigate the activities of the commission leading up to the meeting and vote, the Sportsmen's Alliance sought public records under the PRA.

Washington's (<https://sportsmensalliance.org/news/category/governmentaffairs/washington/>) PRA requires the department to compile, and release, requested records in a reasonable amount of time. At its current rate in processing our request, the department will take 1,975,034 days, or over 5,411 years, to produce the responsive records. Unfortunately, this comes as no surprise. We've heard from sportsmen throughout Washington who wait for months and even years to get a response to their own requests.

"The department's PRA request system is broken, and we're hopeful our lawsuit results in a voluntary or mandatory fix," said Michael Jean, Litigation Counsel at the Sportsmen's Alliance Foundation. "In the meantime, however, we are asking the court to compel the release of the public records we've lawfully requested in order to hold the commission accountable for any statutory missteps it may have taken."

***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/>).*