FINAL

Supplemental

Environmental Impact Statement

for the

2015-2021 Game Management Plan

December 12, 2014

Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, Washington 98501-1091
FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

2015-2021 GAME MANAGEMENT PLAN

Washington Department of Fish and Wildlife
Wildlife Program
600 Capitol Way North
Olympia, WA 98501-1091

December 2014

[Signature]
Philip Anderson, Director
Washington Department of Fish and Wildlife

[Signature]  12/18/14
Date
December 3, 2014

Dear Interested Parties:

The Washington Department of Fish and Wildlife (WDFW) has prepared this Final Supplemental Environmental Impact Statement (SEIS) titled, 2015-2021 Game Management Plan. This Final SEIS is presented to the public and other agencies. The Final SEIS meets the requirements of the State Environmental Policy Act (SEPA) in chapter 43.21C RCW, SEPA rules in chapter 197-11 WAC, and other relevant state laws and regulations.

Significant issues include: wildlife conflict management; recruitment and retention of hunters; hunter access to private lands; disease in big game; re-introduction of pronghorn; and wolf management. These issues, along with corresponding objectives and strategies, have been added to the original 2003-09 issues. Many of the original issues have been updated or modified based on new information and research, changing priorities, or emphasis.

WDFW believes this Final SEIS will assist decision makers to identify the key environmental issues, and options associated with this action. Many changes have been made to the proposed rules and EIS based on comments received from agencies and interested parties during public review of the draft documents, which occurred from July 16 through September 15, 2014 and October 17 through November 21, 2014. Comments received and agency responses can be found in Appendix B and Appendix C to the Final SEIS.

WDFW thanks every citizen and agency for their thoughtful comments and input into this process.

Sincerely,

Lisa Wood
SEPA/NEPA Coordinator
Agency Responsible Official
Regulatory Services Section
Protection Division
Habitat Program
FACT SHEET

Title: 2015-2021 Game Management Plan Final Supplemental Environmental Impact Statement (SEIS)

Proposed Action: Changes to the 2003-2009 Game Management Plan Environmental Impact Statement (EIS) were proposed to update the plan for 2015-21. Strategies that have been accomplished or are no longer a priority have been deleted. New issues, objectives, and strategies are proposed based on public and staff comments gathered over the past several months.

Significant issues include: wildlife conflict management; recruitment and retention of hunters; hunter access to private lands; disease in big game; re-introduction of pronghorn; and wolf management. These issues, along with corresponding objectives and strategies, have been added to the original 2003-09 issues. Many of the original issues have been updated or modified based on new information and research, changing priorities, or emphasis.

Previously, the 2009-2015 Game Management Plan Supplemental Environmental Impact Statement (SEIS) updated the 2003-09 EIS for species management during that period.

Location: Statewide

Project Proponent: Washington Department of Fish and Wildlife (WDFW)
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You can submit your comments or questions any one of the following ways:

- Email to SEPAdesk2@dfw.wa.gov
- Online at the WDFW SEPA website comment link at: wdfw.wa.gov/licensing/sepa/sepa_comment_docs.html
- Fax to (360) 902-2946
- Mail to: SEPAdesk2 (Habitat), 600 Capitol Way North, Olympia, WA 98501-1091

Comments and questions received through these procedures are part of the official SEPA record for this proposal.

Permits and Licenses Required: None required
Authors and principal contributors: Dave Ware, Jerry Nelson, Donny Martorello, Don Kraege, Brian Calkins, Rich Harris, Stephanie Simek, and Colleen Chandler.

Date of issue:


Commission action is planned: Present to Fish and Wildlife Commission on December 12-13, 2014 for adoption.

Date final action is planned: (dates subject to change)

- Finalize SEPA: December 3, 2014
- Review/Approval of Plan: December 12-13, 2014


The 2015-2021 Game Management Plan Final Supplemental Environmental Impact Statement (SEIS) is available for download and comment at: wdfw.wa.gov/conservation/game/2015/

Copies are available for review at: WDFW headquarters and regional offices. A limited supply of CD copies are also available by calling WDFW at (360) 902-2515. Written requests for a copy of the Final SEIS should be addressed to WDFW, Attention: SEPAdesk2 (Habitat), 600 Capitol Way N, Olympia, WA 98501-1091, or via email at: SEPAdesk2@dfw.wa.gov.

Background data and materials referenced in the Final SEIS are available at:
Washington Department of Fish and Wildlife
Wildlife Program
Natural Resources Building, 5th Floor
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EXECUTIVE SUMMARY

This Game Management Plan (GMP) will guide the Washington Department of Fish and Wildlife’s management of hunted wildlife for the next six years. The focus is on the scientific management of game populations, harvest management, and other significant factors affecting game populations.

As mandated by the Washington State Legislature (RCW 77.04.012), “… the Department shall preserve, protect, perpetuate, and manage the wildlife…”; “the Department shall conserve the wildlife… in a manner that does not impair the resource…”; and “The commission shall attempt to maximize the public recreational… hunting opportunities of all citizens, including juvenile, disabled, and senior citizens.” It is this mandate that sets the overall policy and direction for managing hunted wildlife. Hunters and hunting will continue to play a significant role in the conservation and management of Washington’s wildlife.

An Environmental Impact Statement (EIS) was completed on November 27, 2002, after public review of draft and supplemental EIS documents. The Washington Fish and Wildlife Commission formally adopted the Game Management Plan on December 7, 2002. This comprehensive process facilitated public discussion and understanding, while cooperatively developing the priority strategies.

The purpose of this Supplemental EIS is to update the plan for 2015-21. The Environmental Impacts Chapter (Chapter 2) from the original EIS is not included in this document, as no changes were made to that section. Several of the original strategies and objectives have been accomplished, additional studies and research have been conducted, and some priorities have changed. Those are the changes that have been addressed in this SEIS. Public outreach earlier this year helped shape the priority issues, objectives, and strategies identified in the SEIS.

The overall goals are to protect, sustain, and manage hunted wildlife, provide stable, regulated recreational hunting opportunity to all citizens, protect and enhance wildlife habitat, and minimize adverse impacts to residents, other wildlife, and the environment.

With all of these issues, it is understood that the implementation of strategies are conditioned first on meeting game population objectives. Science is the core of wildlife management, supporting WDFW’s legislative mandate to preserve, protect, and perpetuate wildlife populations while maximizing recreation.

Science and the professional judgment of biologists is the foundation for all objectives and strategies identified in this plan. At times, the science may not be as strong as managers would like. In those instances, management actions will be more conservative to minimize the potential for significant negative impacts to hunted wildlife species. Chapter 2 focuses on the science and management of hunted species and lays out how those populations will be monitored to ensure perpetuation of these species over the long term.
CHAPTER 1

Introduction
The mission of the Washington Department of Fish and Wildlife (WDFW) is “Sound Stewardship of Fish and Wildlife.” The Department serves Washington’s citizens by protecting, restoring, and enhancing fish and wildlife and their habitats, while providing sustainable fish and wildlife-related recreational and commercial opportunities. Planning helps the Department prioritize actions to ensure accomplishment of its mission and mandate.

The purpose of the Game Management Plan is to assess current issues for hunted wildlife and outline strategies to help WDFW prepare for the future. The emphasis in this plan is the scientific management of hunted species populations, harvest management (hunting), and other significant factors affecting game populations. The plan is dynamic, and it is designed to facilitate resolution of emergent issues and allow adjustment of priorities when issues are resolved. The issues and options in the plan are based on current management information. As new information becomes available, options may be modified or new ones developed.

The plan identifies priorities for hunted wildlife and keeps the Department focused, directed, and accountable. The plan will guide the development of the three-year hunting season packages for 2015-17 and 2018-20. In addition, the plan will direct the development of WDFW Game Division work plans and budget proposals. Implementation will begin July 2015 and continue through June 2021.

The overall goals of the plan are to protect, sustain, and manage hunted wildlife, provide stable, regulated recreational hunting opportunity to all citizens, to protect and enhance wildlife habitat, and to minimize adverse impacts to residents, other wildlife, and the environment.

Public Involvement
Active public involvement is important for successful planning. In May 2001, WDFW asked the public to identify the key game management issues that need to be addressed in the future. This was done using a series of questionnaires and by facilitating input via a webpage on the agency’s website. Over 2,500 responses were received. Based on the issues identified during this process, WDFW hired a consulting firm to conduct a telephone survey of both the hunting public and the general public. This was used to get a more scientific sampling of the public. Responsive Management conducted the surveys using randomly selected telephone numbers with a sample of over 800 citizens for the general public survey and over 700 hunters for the hunter survey. References to public opinion based on this survey are made throughout this plan. To further refine the priority issues, WDFW consulted with the Game Management Advisory Council, the Wildlife Diversity Advisory Council, and members of the Fish and Wildlife Commission. The advisory councils include a cross section of interested citizens who provide feedback and advice to WDFW on a variety of topics. The information from the surveys, polls, and consultations identified the issues addressed in this plan. Finally, WDFW followed the Environmental Impact Statement (EIS) process to facilitate public involvement in reviewing alternatives and setting priorities.
The main issues identified by the public were categorized into several key areas:

- Scientific/professional management of hunted wildlife
- Public support for hunting as a management tool
- Hunter ethics and fair chase
- Private lands programs and hunter access
- Tribal hunting
- Predator management
- Hunting season regulations
- Game damage and nuisance
- Species-specific management issues

The first public release of the Draft Environmental Impact Statement (DEIS) for the Game Management Plan (GMP) was on July 26, 2002. After an extension, the deadline for public comment was September 10, 2002. Comments were received from over 77 groups and individuals. Extensive public comments resulted in significant re-writing and re-formatting of the EIS and GMP. Key changes included the EIS formatting, modification of elk and cougar issues, refining objectives and strategies, and consideration of the impacts of hunting on non-target wildlife species.

A Supplemental EIS (SEIS) was released on October 18, 2002, with a public comment deadline of November 18, 2002. During this comment period, a scientific peer review of the cougar management section of the plan was also solicited by WDFW.

The process of developing a non-project EIS allowed WDFW to use an iterative process, with releases of a Draft and a Supplemental EIS to facilitate public comments and add, modify, or delete strategies. This iterative process was used instead of the more traditional use of preferred and alternative strategies. Essentially, the number of alternative strategies was not limited and the preferred strategies were developed in concert with the public through a long scoping and development process and multiple comment periods.

The current process (2014) of developing a Supplemental EIS included a public scoping period, discussions with the Game Management Advisory Council, the Wolf Advisory Group, the Master Hunter Advisory Group, the Waterfowl Advisory Group, an updated telephone survey of hunters and the general public, and the current comment period for the draft of this supplemental EIS. Thousands of comments have been received to help shape the amended issues, objectives, and strategies to be implemented in the 2015-2021 Game Management Plan.

A few new issues or emphasis areas have also surfaced including:

- Wildlife Conflict Management
- Recruitment & Retention of Hunters
- Disease Impacts
- Non-toxic Ammunition
- Re-introduction of pronghorn
- Wolf Management
Commission and Department Authorities

The establishment of hunting seasons and management of game species is consistent with the authorities granted the Fish and Wildlife Commission and Department of Fish and Wildlife by the Washington State Legislature through Title 77 of the Revised Code of Washington. The Fish and Wildlife Commission develops and adopts hunting regulations (i.e., rules in the Washington Administrative Code) per the authority granted under Title 77 authority. In addition, various Commission and Department policies and procedures, including this Game Management Plan (GMP) guide game management.

The Washington Fish and Wildlife Commission and Department of Fish and Wildlife are responsible for the management and protection of fish and wildlife resources in Washington State. The Legislative mandate (RCW 77.04.012) for the Commission and the Department includes the following directives for wildlife management:

- The Commission, director, and the Department shall preserve, protect, perpetuate, and manage the wildlife...
- The Department shall conserve the wildlife resources in a manner that does not impair the resource. The Commission may authorize the taking of wildlife only at times or places, or in manners or quantities, as in the judgment of the Commission does not impair the supply of these resources.
- The Commission shall attempt to maximize the public recreational hunting opportunities of all citizens, including juvenile, disabled, and senior citizens (see Title 77 Revised Code of Washington).

In addition, various policies and procedures guided the Commission and Department in developing this GMP. In particular, the Washington Department of Fish and Wildlife Hunting Season Guidelines (August 1999), and further amended by the Commission in 2014, provide further guidance for this GMP:

Hunting seasons and regulation recommendations should be based on good science. When biological information is lacking or insufficient, management decisions should be sufficiently conservative to ensure protection of wildlife resources. At no time should decisions favor income to the agency or recreational opportunity to the detriment of conservation of wildlife populations.

1. In general, hunting seasons and boundaries of game management units should be easy to understand while maintaining hunting opportunity and management options.
2. Continuity in hunting seasons over time is highly valued by the public; therefore Department recommendations for significant changes to seasons should be adequately explained to the public and should address a resource management need.
3. Establishing hunting seasons shall be consistent with the Commission Policy C-3607 regarding cooperatively managing wildlife resources with the tribes.
4. In general, hunting seasons shall be consistent with species planning objectives and provide maximum recreation days while achieving population goals.
5. A three-year season setting process which provides consistent general seasons from year to year with annual changes in permit levels to address emergent resource issues; natural disasters; and to meet requirements of federal guideline changes; etc.
6. The public shall be offered substantial and timely opportunity to make comments on and recommendations for the three-year hunting rules decision-making process. These opportunities must comply with the state’s Regulatory Reform Act.

7. Public involvement for annual permit season setting shall include at a minimum, a standard written comment period and one public meeting where comments will be considered.

8. Hunting rules shall provide separate deer and elk general season recreational opportunities for archers, muzzleloaders, and modern firearm hunters.

9. Special deer and elk permit hunt opportunities shall be allocated among three principal user groups (archery, muzzleloader, and modern firearm) using the approved formula of success/participation rate.

10. Weapon and hunting equipment restrictions should maintain public safety; protect the resource; allow wide latitude for individuals to make equipment choices; be easy to understand and allow effective enforcement.

11. Disabled hunter opportunities shall emphasize equal access consistent with the Americans with Disabilities Act.

12. For disabled hunters, graduates of Master Hunter programs, youth hunters, and hunters over 65, strategies for enhanced opportunity shall include special consideration during general seasons, opportunities for special access, and other incentives rather than special permit hunts. Master Hunter incentives should return to the program’s original intent, which was to address wildlife problems, issues associated with hunter ethics, and the challenging hunting circumstances on private lands.

13. Private landowner hunting issues such as season length, damage control, and trespass should be given consideration when developing hunting season recommendations.

14. The rules shall standardize furbearer seasons to provide trapping opportunity and address damage control.

15. The migratory bird and small game regulations shall provide maximum hunting opportunity considering federal guidelines, flyway management plan elements, and Department management objectives.

16. The hunting season closures and firearm restrictions shall be sufficient to assure resource conservation and public safety.

17. The goat, sheep, and moose permit hunting rules shall maintain high quality opportunities consistent with resource availability.

18. The Department shall maintain programs that offer the public high quality hunter education and firearm safety training.

19. The Department shall promote high standards of hunter ethics and adoption of principles of fair chase.

Implementing the legislative mandate and the Commission guidelines for game species requires knowledge of game population trends and impacts of hunting regulations, development and management of hunting seasons and actions that support and maximize public recreation, and conservation of wildlife resources. The Fish and Wildlife Commission adopts major hunting seasons every three years. Minor adjustments are made annually such as modifying permit levels or addressing crop damage or nuisance problems. Migratory waterfowl seasons are adjusted annually in coordination with the U.S. Fish and Wildlife Service and the Pacific Flyway Council. The process for developing hunting seasons typically includes the following steps:
1. Staff determine the status of game populations and impacts of previous harvest strategies;
2. Staff engage in preliminary discussion of ideas with the tribes, the public, state and federal agencies, and WDFW biologists and managers;
3. Staff develop a set of season and regulation alternatives;
4. Staff prepare formal submissions pursuant to the Administrative Procedures Act of the draft regulations and identify the period for public comment;
5. Staff receive, consider, and summarize public comments;
6. Staff develop final recommendations for hunting season rules;
7. The Fish and Wildlife Commission considers staff recommendations, public comments, and related information and adopts regulations governing hunting seasons.

The process of establishing hunting seasons, bag limits, and geographical areas where hunting is permitted is exempt from State Environmental Policy Act (SEPA) rules through WAC 197-11-840. In addition, feeding of game, issuing licenses, permits and tags, routine release of wildlife, or re-introductions of native wildlife are also listed as exemptions from SEPA rules. However, policy development, planning, and all other game management actions are not considered exempt from SEPA rules.

**Background and Setting**

**Native Americans**

Native Americans have inhabited the State of Washington for at least 9,000 years. The Cascade mountain range splits Washington State into two very distinct environments: the dry conditions of the east and the much wetter, rain forest areas of the west. Native Americans adapted to these different conditions and evolved into two distinct patterns. The Pacific Coast Indians inhabited a land of plenty with an abundance of fish, shellfish, roots, berries, and game. While Native Americans east of the Cascades also had access to salmon and steelhead returning up the Columbia River system, they depended more on game and other food sources (Pryor 1997).

In 1853, Isaac I. Stevens was named the first Territorial Governor of the Washington Territory. He was also appointed Commissioner of Indian Affairs and negotiated treaties between Pacific Northwest tribes and the United States of America to pave the way for settlement and assimilation of Native Americans into non-Indian society. The treaties established a number of reservations for the Indian people, and in exchange the tribes ceded much of their territory to the U.S. government. The treaties and associated tribes are shown in Table 1.

**Table 1. Indian Treaties between the United States of America and Northwest Indian Tribes.**

<table>
<thead>
<tr>
<th>Treaty</th>
<th>Indian Tribes</th>
<th>Location and Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Treaty with the Yakamas</td>
<td>Yakama confederated tribes and bands</td>
<td>Camp Stevens, Walla Walla Valley</td>
</tr>
<tr>
<td>Treaty with the Walla Wallas</td>
<td>Walla Walla, Cayuse and Umatilla tribes and</td>
<td>Camp Stevens, Walla Walla Valley</td>
</tr>
<tr>
<td></td>
<td>bands</td>
<td>June 9, 1855</td>
</tr>
<tr>
<td>Treaty of Olympia</td>
<td>Quinault, Hoh, and Quileute</td>
<td>Que-nai-elt River –Jan. 25, 1856</td>
</tr>
<tr>
<td>Treaty of Point No Point</td>
<td>Jamestown S’Klallam, Port Gamble S’Klallam,</td>
<td>Point No Point, Suquamish Head</td>
</tr>
<tr>
<td></td>
<td>Lower Elwha, Skokomish</td>
<td>Jan. 26, 1855</td>
</tr>
</tbody>
</table>
Table 1. Indian Treaties between the United States of America and Northwest Indian Tribes. (Continued)

<table>
<thead>
<tr>
<th>Treaty</th>
<th>Indian Tribes</th>
<th>Location and Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Treaty of Point Elliott</td>
<td>Lummi, Nooksack, Stillaguamish, Swinomish, Upper Skagit, Suquamish, Sauk Suiattle, Tulalip, and Muckleshoot</td>
<td>Point Elliott January 22, 1855</td>
</tr>
<tr>
<td>Treaty with the Nez Perces</td>
<td>Nez Perce</td>
<td>Camp Stevens, Walla Walla Valley June 11, 1855</td>
</tr>
<tr>
<td>Treaty of Neah Bay</td>
<td>Makah</td>
<td>Neah Bay January 31, 1855</td>
</tr>
<tr>
<td>Treaty of Medicine Creek</td>
<td>Nisqually, Puyallup, Squaxin Island, Muckleshoot</td>
<td>Medicine Creek December 26, 1854</td>
</tr>
</tbody>
</table>

The tribes that signed the treaties retained certain rights and privileges. For example, Article 3 from the Medicine Creek Treaty with the Nisqually, Puyallup, Squaxin Island, and Muckleshoot Tribes states:

*The right of taking fish, at all usual and accustomed grounds and stations, is further secured to said Indians in common with all citizens of the Territory, and of erecting temporary houses for the purpose of curing, together with the privilege of hunting, gathering roots and berries, and pasturing their horses on open and unclaimed lands...*

Washington State courts have interpreted this treaty language to mean that treaty tribes can hunt within the boundaries of the area ceded to the federal government by their treaty, or in areas traditionally “used for hunting and occupied over an extended period of time,” on open and unclaimed lands that have not been put to a use that is inconsistent with hunting. In conjunction with such hunting, tribes are responsible for the management of their own hunters and hunting activities.

Not all of the tribes signed treaties with the government. Several of these tribes have reservations designated by federal executive order. These include the tribes of the Colville, Spokane, and Kalispel reservations in eastern Washington and the Chehalis and Shoalwater reservations in western Washington. Tribal hunting rights for these tribes are typically limited to areas on the reservation, or in the case of the Colville Tribe to areas that were formerly part of the reservation. There are additional tribal groups that are recognized by the federal government, but have no specific reservation or tribal hunting rights. Since tribal and non-tribal hunters impact the wildlife resource over much of the state, it is important that WDFW and the tribes work cooperatively to develop management strategies that can meet the needs of both. This process is complicated by the fact that tribal subsistence and ceremonial hunting and state recreational hunting are two very different philosophies steeped in different traditions and cultural heritages (McCorquodale 1997). This means that both sides have to work very hard to understand and appreciate other views.

Tribal governments take an active role in the management of wildlife resources. They typically have a tribal hunting committee that meets to develop regulations and management strategies. Many tribes have hired biologists or have access to biological staff that can advise them on the development of management approaches. Tribes have taken the lead in several areas on research projects to gather the information that is needed to better manage wildlife resources. WDFW and various tribes are working together to develop herd plans for key wildlife populations. WDFW is also working cooperatively with tribes to rebuild or augment populations that are below desired levels.
European Settlement

During the early European settlement of North America, hunting was primarily a subsistence activity (Organ and Fritzell 2000). The same was true for the early immigrants to the Washington Territory. Hunting was also used to eliminate animals that posed a threat to humans or their livelihood. Hunting eventually became a profitable commercial venture promoted initially by the fur trade and later for food, clothing, and jewelry. Conflicts between market hunters and sport hunters began to occur by the mid-1800s and nationally some influential sportsmen’s organizations were formed (Trefethen 1975). During the 19th century, hunting changed from mostly a subsistence activity to a commercial one, and then to the beginnings of a recreational activity. At the same time, wildlife habitats were being fenced, plowed, burned, developed into towns, and cut by roads and rails (Madson and Kozicky 1971).

By the late 1800s, there was a new movement of sportsmen and other conservation minded people. Theodore Roosevelt led a social movement that pressed for an end to commercial traffic in wildlife and for government oversight of wildlife conservation (Reiger 1975, Warren 1997). Roosevelt introduced a new thought, “conservation through wise use” (Madson and Kozicky 1971). It was also the foresight of President Roosevelt that was responsible for the establishment of the U.S. Forest Reserves (Service) and the creation the National Wildlife Refuges. His legacy of public lands is in place today, more important than ever before, as strongholds of fish and wildlife in Washington State and the Nation.

In 1928, the American Game Conference, chaired by Aldo Leopold, formed a committee on Game Policy. During this period, wildlife conservation programs focused on laws and enforcement, but a formal wildlife management profession did not exist. The report (Leopold 1930) described the problem of declining wildlife and recognized the need for scientific facts concerning game species management. The committee called for the reorganization of state game departments and outlined the steps needed to reverse the trend (Madson and Kozicky 1971, Organ and Fritzell 2000).

“The report strongly urged that conservation be taken out of politics, that fish and game funds be earmarked for fish and game programs, and that every effort be made to build competent, stable, adequately-financed conservation departments (Madson and Kozicky 1971).”

Funding for key elements of the (government) agencies was linked to earmarked fees paid by hunters. Most significant were the Migratory Bird Hunting Stamp Act (1934), which funded National Wildlife Refuges; and the Federal Aid in Wildlife Restoration Act (1937), which provided federal funding for state agencies.

As the population of Washington increased, laws were enacted to protect the wildlife resources. The Legislative Assembly of the Territory of Washington enacted the first laws concerning wild animals within the territory in 1863. The first game species law allowed the “county commissioners of each and every county authority, if they think proper, to offer a bounty for killing wild animals.” Although a few early laws were passed to preserve and protect game, they were largely ineffective and not enforced. In 1890, the Governor was given authority by the Legislature to appoint game wardens in each county.

In 1901, the State Legislature passed the first hunting license requirement allowing counties to issues licenses with a fee of $1.00 for residents and $10.00 for non-residents. In addition, any
person killing a male elk was required to pay an additional sum of $20. Thus, game management in Washington entered the twentieth century with the beginnings of a user-fee hunting program to be administered by the county.

The passage of the Pittman-Robertson Federal Aid in Wildlife Restoration Act specified that an eleven percent excise tax on sporting arms and ammunition must be maintained in a separate fund in the Treasury and allocated annually to the states. In order for the states to participate, each state was required to pass enabling legislation and adhere to the provisions of the Act. This required all hunting license fees be dedicated to use by the state game department. The enabling legislation was passed by Washington State Legislature and signed into law in 1939. This was the beginning of modern wildlife management.

The Natural Environment

Washington has a rich diversity of flora. Forests cover about half of the state’s land area. The Olympic Peninsula supports a temperate rain forest consisting of spruce, cedar, and hemlock, with an understory of ferns and mosses. The areas surrounding the Puget Sound and the western slopes of the Cascade Range are forested, consisting mostly of cedar, hemlock, and douglas fir, with an understory of shrubs. On the eastern slopes of the Cascades and in the Blue Mountains of southeastern Washington ponderosa pine, douglas fir, grand fir, western hemlock, and sub alpine fir are the major conifer species. The forests in these areas are more open, with an understory of grasses and shrubs, especially at the lower elevations. Across the northeast region of the state, the forest is dominated by douglas fir, western red cedar, western hemlock, and sub-alpine fir. The forests of the state have been intensively logged and contain second and third growth forest plantations of mostly douglas fir (Access Washington 2002).

In the Columbia Basin, the native vegetation is drastically different from the forested lands of the state, due to the dryer and hotter climate of the region. The pristine vegetation consisted of shrubs and grass (shrub steppe). With the introduction of agriculture and livestock grazing in the mid-1800s the vegetative character of the land took on a new look. Overgrazing by sheep, cattle, and horses was evident by 1885. Lands were cleared for intensive farming, both dry land and irrigated. On the prairies of the Palouse, the conversion of all arable land was nearly complete by 1910. Other lands are continuing to be converted to the growing of agricultural crops or converted to urban uses (Access Washington 2002).

The introduction of non-native weed species by imported livestock, contaminated commercial seeds, and other sources have resulted in a dramatic change in the landscape and the productivity of the land for commercial use, as well as intrinsic values. In Washington, invading weeds have adversely impacted native wildlife habitat and domestic livestock rangelands (Access Washington 2002).

The Social Environment

The evolution of the human social environment and its impact on the natural environment has been dramatic from pre-settlement to the present. Some game species have benefited from this transition while others have not.
Between 1950 and 1960, 60% of Washington’s human population resided in incorporated areas. In 1990, only 52% live in incorporated areas (Access Washington 2002). This movement of people into rural and formerly undeveloped lands had significant impacts on wildlife habitat and abundance.

Washington has the second largest human population of the western contiguous states, but is the smallest in size. In 2010, the population was estimated at 6,724,540 compared to 5,974,900 in 2001 making it the 13th most populous state in the union. The long-term outlook in human population for the state of Washington is continued growth reaching the 7 million mark in 2015, with ever increasing impacts to the natural resources of the state.

The ten largest cities are almost exclusively on the west side of the state, with Spokane and Yakima the two representatives from the east side. The US Interstate 5 Highway corridor is the area of highest human population and where the greatest changes to the natural environment have taken place. Seattle is the largest city in the state with over a half million people. The cities of Spokane, Tacoma, Vancouver, Bellevue, and Everett are all over 100,000 in population.

**Industry**

Before settlement, the Pacific Northwest region was important for its fur-trapping industry. With the completion of the Northern Pacific Railroad in 1886 and Great Northern Railroad in 1893, Washington’s economy grew. Agriculture and the lumber industry developed in western Washington and eventually to the east. A transportation network was a key to the growth of the state’s economy (Access Washington 2002).

During the twentieth century, the construction of dams on the Columbia and Snake rivers provided abundant, cheap electrical power, resulting in the rapid growth of manufacturing. Dams for agricultural irrigation also advanced farming in the dryer Columbia Basin. Farms in western Washington are small, and dairy products, poultry, and berries are the primary commodities produced. The eastern side of the Cascade Range has larger farms, and potatoes, fruit, vegetables, and small grains such as wheat and barley are the primary crops.

According to the Economic Research Service of the U.S. Department of Agriculture, the 2007 Census of Agriculture showed that Washington farmland acreage totaled 14.9 million or about 35% of the total land area. Farmlands are highly valued wildlife habitats for which the landowner is not often recognized. Game species such as pheasants, quail, deer, elk, and waterfowl are attracted to private lands for their abundance of food and water.

Recent changes in natural resource policies, implementation of new ecosystem management strategies, as well as changing silvicultural practices on private forest lands have affected the timber industry, the people of Washington, and the Northwest. The timber harvest changes in Washington between 1989 and 2012 have been substantial (Table 2), (DNR 2012). The changes in forestry practices are necessary for the survival of many species that require older, more ecologically complex forests. However, there may be serious impacts to the future amount and quality of deer and elk forage and population numbers due to the lack of robust early-successional habitats over the long term.
Table 2. Timber harvest changes in Washington between 1989 and 2012.

<table>
<thead>
<tr>
<th>Ownership</th>
<th>1989 harvest a</th>
<th>2012 harvest a</th>
<th>Percent Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private</td>
<td>4,027,278</td>
<td>2,182,159</td>
<td>-45.8</td>
</tr>
<tr>
<td>Public</td>
<td>1,929,039</td>
<td>33,260</td>
<td>-98.3</td>
</tr>
<tr>
<td>Total</td>
<td>5,956,317</td>
<td>2,217,431</td>
<td>-62.8</td>
</tr>
</tbody>
</table>

a in thousand board feet

Land Use and Ownership

The total land area of the state is 45.9 million acres. Out of this total, 2.6 million acres are aquatic lands and 43.3 million acres are uplands. The public land ownership and principal uses in the state are found in the publication Interagency Committee for Outdoor Recreation 2001.

Public lands make up about 52% of the state. The U.S. Forest Service, representing about 41% of public lands, manages the greatest amount of public land. The total of all federal ownership in Washington represents about 58% of public lands. State lands represent about 27% of public lands. The Department of Natural Resources is the largest manager of state lands. Local and tribal lands make up the rest.

Public lands are not evenly distributed across the state, because of the historical pattern of settlement and development. The largest concentrations of public lands are at the higher elevations, while the lowlands and lands associated with waterways are mostly private. The Columbia Basin in eastern Washington and the Puget Trough region on the west side are mostly in private ownership.

Washington Hunters

The number of licensed hunters in the state of Washington grew rapidly since the 1930’s with the increase in leisure time and availability of game. Historical records of hunting license sales by the counties are not readily available from 1901 to 1933. From 1933 to 1953, hunting license sales increased, peaking in 1953 at approximately 445,000 state and county hunting and fishing combination licenses sold (Figure 1). The growth in hunting license sales was particularly steep following World War II.
In 1999, WDFW changed the type of license sold from a “state residential hunt” license to big game and small game licenses. In 1954, a separate resident hunting license was introduced resulting in a substantial drop in total licenses sold. This drop most likely reflected the number of fishers who chose not to purchase a state hunting license rather than the hunting/fishing combination license because they had no intention of hunting. If this is true, then the increasing trend in hunters actually peaked quite a few years later in 1979 with about 358,000 hunting licenses sold. Thereafter, sales declined through 1989, when 261,907 licenses were sold. After 1989, hunter numbers slowly but consistently declined; at the same time the state’s human population increased substantially.

A discussion of trends in hunting participation by Brown et al. (2000) suggests that the trend of stable to decreasing numbers of hunters continues. They predict managing wildlife damage through hunting will be increasingly challenging because of declining recruitment of hunters and declining social support for hunting. In Washington, an analysis of general season deer hunter trends shows a slow decline. Since 1984, deer hunting participation rates have been highly variable from one year to the next but generally declining (Figure 2).

Washington hunter characteristics in 2011 were very different from a century ago. In 2012, Washington hunters were mostly well educated: Overall, 83% of Washington hunters had graduated from high school (or equivalent). In addition, many Washington hunters had obtained additional higher education, including some additional college or trade school training (39% of hunters), college degree (19%), and post-graduate or professional degrees (9%) (Responsive Management 2008). In 2008, Washington hunters were mostly 35 years old or older, with over half being 45 or older (Responsive Management 2008). In comparing an older demographic study of Washington hunters (Johnson 1973) to recent data (National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, U.S. Fish and Wildlife Service 2011), there has been little change in male dominance (94% males and 6% females) in the intervening 31 years. Age distributions of hunters in 1972 and 2008 are not directly comparable between the two studies. However, it is apparent that the majority of hunters in 1972 were less than 29 years of age compared to 2012 data where age of respondents were predominantly 35 years of age and older (70%) (Responsive Management 2008).
Resource Allocation

During the 1970s, big game hunter numbers in Washington were at an all-time high. Hunter crowding, competition among hunters, and the declining quality of the hunting experience resulted in significant hunter dissatisfaction. As a result, many hunters changed from the use of modern firearms to primitive archery equipment and black powder muzzle loading rifles to take advantage of less-crowded hunting conditions. In 1982, the Department formed a Big Game Ad Hoc Committee to address the problems facing hunters in Washington and developed a plan of fair allocation of hunting opportunity. The committee identified three major goals as follows:

1. Reduce crowding in the more popular modern firearm hunting seasons.
2. Provide quality-hunting opportunity.
3. Provide early primitive weapon opportunity.

Following extensive debate and public involvement in 1984, the Fish and Wildlife Commission adopted a major change in deer and elk hunting. This new rule required all deer and elk hunters to select one type of gear for hunting (modern firearm, archery or muzzleloading rifle). In addition, all elk hunters continued to be restricted to an elk tag area.

Since 1984, modern firearm deer hunters have continued to represent the majority (over 70%) of active hunters. Archery deer hunter numbers increased to about 19% of deer hunters then stabilized. The number of muzzleloader deer hunters has shown a more protracted incline but appear to have stabilized, representing about 6% of the deer hunters.

On the other hand, elk hunter numbers have shown a more pronounced change in user group size. In 1984, modern firearm hunters represented 88% of all elk hunters, archery hunters 9.5%, and muzzleloader hunters 2.4%. In 1999, the modern firearm hunter represented just 68% of the total, archery hunter numbers doubled in percentage, and muzzleloader hunters increased six-fold (Johnson 1999). Since about 1994, the proportion of each user group (modern firearm, archery and muzzleloader elk hunter) has stabilized at about 69%, 17% and 14% respectively.
Separating hunters by hunting method has successfully distributed hunting pressure, relieved congestion, and increased primitive weapon opportunity. However, the quality of hunting opportunity has been more difficult to assess.

Resource allocation continues to be a contentious issue with hunters. A few of the more hotly contested issues include:

- Which group gets to hunt first?
- How should timing of various hunting seasons between user groups be fairly established?
- Should fairness be related to equal opportunity (days) or equal success?
- How primitive should “primitive weapon” hunting seasons remain?
- How should quality opportunity be addressed?

**Hunter Education/Safety Training**

Hunter education programs are in place in all 50 states, reaching about 650,000 hunters annually (Duda et al. 2010). In Washington, all individuals born after January 1, 1972, must show proof that they have completed a hunter education course before purchasing a hunting license.

The former Washington Department of Game first offered hunter education in 1955 on a voluntary basis. In 1957, it became mandatory for all juveniles less than 18 years of age. In 1995, all individuals born after January 1, 1972 were required to successfully complete a hunter education class. Washington currently certifies approximately 13,000 Hunter Education students each year.

**Hunter Access**

As early as 1875, the Legislative Assembly of the Territory of Washington passed a law that prohibited persons from entering upon private lands (enclosed premises) without permission from the landowner for the purpose of hunting grouse during the open season. This law demonstrates the early roots of conflict between hunters and landowners. Hunter access onto private lands and through private lands to public lands is a continuing issue.

WDFW has placed considerable emphasis over the years on obtaining access to lands for the enjoyment of hunting. Currently, there are several programs promoting hunter access. For decades the WDFW Private Lands Program has provided incentives to private landowners through technical assistance, implementation of habitat enhancement strategies, and hunter management assistance. Landowners agree to open their lands for recreational opportunity in exchange for materials and help planting and developing habitat. Over the past decade WDFW has also begun to offer cash incentives on either a per-acre or per-site basis in limited high priority focus areas where access has been difficult to secure. The Department provides free signs and assists the landowner in posting their lands as “feel free to hunt,” “register to hunt,” “hunt by written permission”, or “hunt by reservation only.” “Hunt by reservation” is the newest option and was first used in 2013 to provide quality hunting opportunities and give landowners another option to meet their needs. There are over 1 million acres and over 500 landowners in Washington under cooperative agreement.

The Private Lands Wildlife Management Area (PLWMA) program was developed and initiated on a trial basis in 1993. This program was designed to enhance wildlife habitat on private lands and encourage public access opportunities. Two PLWMAs were authorized in 1993, 201-Wilson
Creek and 401-Champion’s Kapowsin Tree Farm. A third PLWMA 600-Pysht was added in 1997. A common criticism of this program from hunters was that public access was not adequately addressed and wildlife habitat enhancements may have been driven by incentives, rationale, or regulations outside of the PLWMA program. In 2006, the Fish and Wildlife Commission revised the state policy for the private lands program. As part of the revision, the PLWMA program was terminated and the Landowner Hunting Permit (LHP) program was developed. The major change included the provision of public hunting benefits. There are currently six cooperators in the LHP program, all located in eastern Washington.

There are many benefits for market-based (economically beneficial) programs on private lands for both the public and the private landowner. The major benefits are opening closed private lands to public access, protection and enhancement of wildlife habitat, and economic benefit to private landowner and local economies. On the other hand, major impediments include the concern for loss of control by state agencies, potential for over-harvest of the wildlife resource, and a potential for forced decline in hunter participation rates because of escalating costs (Duda et al. 2010).

A survey of Washington hunters was conducted (Duda 2002b) to determine opinions about private land access and other private land programs. A strong majority of hunters felt that private lands were very important to wildlife and for outdoor recreation. All hunter groups surveyed felt that private land programs should provide incentives to landowners for improved wildlife habitat and allowing access onto their lands. The majority of all hunters agreed that access to private lands for hunting is important even if an access fee is charged. A 2009 survey (Duda et al.) found that 58% of hunters felt that lack of access had affected their hunting activity over the previous five years.

Hunters are feeling the “crunch” in available hunting areas. Private lands have always been recognized as important to the future of hunting, especially upland game bird and waterfowl hunting. More recently, access restrictions and landowners charging fees on large tracts of commercial timberlands has become a major concern. By the end of 2014, over a quarter of Washington’s private industrial timberland may be in some form of a fee access system with some of those landowners limiting the number of hunters well below historical levels. Maintaining hunting opportunities on these lands is becoming increasingly difficult and may lead to further crowding on public lands. The hunter’s willingness to pay landowners for hunting opportunity is a significant change from attitudes of the past.

**Economics**

In 2011, Washington hunters spent $356 million for trip related expenses, equipment, and other expenditures primarily for hunting (U.S. Dept. of Interior et al. 2011). About 46% of their expenditures were for food, lodging, and transportation; 44% for hunting equipment (guns, ammunition, camping); and 10% for the purchase of magazines, membership dues, land leasing, and licenses and permits.

The national survey reported that there were 219,000 resident and nonresident hunters 16 years of age or older who hunted in Washington. These hunters spent 2.5 million days hunting in the state. Expenditures per hunter were $1,421 or $64 per day per hunter.
Resources provided to the Department during the 2013-15 biennium were $375.8 million. Funding came from a variety of state, federal, and private/local sources. The chart below shows relative proportions of those funds.

There are six programs within WDFW. Each program’s proportion of the operating budget is shown in the chart below:

The Game Division is one of six divisions in the Wildlife Program. The 2013-15 biennial budget for the Game Division is about $19 million. Of that total, over $5.5 million is dedicated to specific activities. The dedicated fund sources are from auction and raffle sales ($1.3 million), migratory bird permit sales ($639,000), turkey tag sales ($331,000), background license plate sales ($572,000), the eastern Washington pheasant enhancement program ($879,000), and wolf management ($1.8 million). The remaining funds come from the general fund ($60,000), revenue from license sales or the wildlife fund ($5.1 million), and federal funds ($8.7 million), which is mostly from the Pittman-Robertson Act (excise tax on sporting equipment and ammunition).

This $19 million is the base funding for most of the activities identified in this plan except for research, hunter education, and law enforcement. These activities are funded from other divisions.
or programs within WDFW. Implementation of new activities in this plan will be dependent on additional funding, grants, and partnerships.

LITERATURE CITED


CHAPTER 2

General Game Management Issues

The process of developing a non-project EIS allowed WDFW to use an iterative process. Essentially the number of alternative strategies is not limited, and the strategies are developed in concert with the public through a scoping and development process and multiple comment periods. The original 2003-09 plan was updated for 2009-15, and is now being updated for 2015-2021.

During the original 2003-09 public involvement process, issues were identified in nine categories for WDFW to address in the plan. The major categories included: scientific/professional management, public support for hunting as a management tool, hunter ethics and fair chase, private lands programs and hunter access, tribal hunting, predator management, hunting season regulations, and game damage and nuisance. The final category, which centered around species-specific management issues is addressed in this document. The issues, objectives, and strategies contained within this plan are the preferred alternatives.

Scientific/Professional Management of Hunted Wildlife

The concept of scientific management is very important to the public. The use of scientific information and the judgment of professionals in management decisions were rated very high (>90%) by both the general public and hunters. Next came economic (>68%) and social concerns (>54%), followed by political concerns (<25%), which received low ratings.

Issue Statement

WDFW wildlife managers and biologists have developed goals, objectives, and strategies in this plan to ensure long-term sustainability of all wildlife. The best available science will be the basis for the maintenance of all endemic wildlife populations. Strategies for hunted wildlife will not have significant negative impacts on the sustainability of other wildlife or their habitats. None of the strategies, subsequent hunting season recommendations, or implementation of activities will deviate from these fundamental principles. Science is the core of wildlife management, the basis for achieving the agency’s mandate, and the foundation of this plan.

Objective 1:

Game Division Section Managers, Regional Wildlife Program Managers, District Wildlife Biologists, and field biologists should each attend at least one professional seminar/workshop each year that is relevant to their job.

Strategies:

a. Agency staff will maintain regular contact with peer scientists and wildlife managers by attending Wildlife Society, Western Association of Fish and Wildlife Agencies, and Technical Group meetings including the annual Game Division workshop or other professional workshops.

b. Significant impacts and the scientific basis for recommended actions will be “peer reviewed” by scientists outside WDFW when determined necessary by WDFW biologists and managers.
Issue Statement

While science and professional opinion form the foundation of wildlife management, social and economic issues often strongly affect public opinion, and influence management strategies and regulations. An easily accessible public involvement process is necessary to facilitate broad public involvement in developing and implementing management alternatives. The key is to develop programs that both achieve key biological objectives and are supported by the public.

Objective 2:

Provide multiple opportunities for stakeholders and the interested public to participate in development of three-year regulation packages, collection of biological information, and in planning efforts for game species.

Strategies:

a. Maintain citizen advisory councils and seek their input at least twice during the process of developing plans and regulation packages, and post the dates of those meetings on the WDFW web page.

b. Use the WDFW Web page to encourage public comment and ideas for regulations and priorities.

c. Conduct a minimum of one public meeting in each WDFW region for statewide issues, two per WDFW region for more local issues, and provide other routine opportunities for the public to interact with WDFW staff regarding plans and three-year regulation packages.

d. Conduct a public opinion survey at least once every six years to monitor support for agency programs, planned activities, and regulations.

e. Publicize and maintain an email list of citizens interested in receiving copies of plans and regulations and notify those on the list as plans and season recommendations are developed.

f. Encourage public participation and comment during the Fish and Wildlife Commission meeting process.

g. Use webinars or other interactive forums to workshop with stakeholders, interested public, and organizations.

Predator/Prey Interactions

This section does not include gray wolf management; they are addressed in the Wolf Conservation and Management Plan. Predator populations (especially black bears and cougars) have increased to long-term sustainable levels in Washington over the past 30 to 40 years. While the public generally views their increase positively from an ecological perspective, managing carnivores in the smallest state in the west with the second highest human population presents many challenges. One of those challenges is addressing potential predator effects on prey species.

WDFW must effectively manage wildlife to meet population objectives in balance with citizen tolerance and support. The management goals for black bear, cougar, bobcat, and coyote will ensure managing statewide predator populations for healthy, long-term viable population levels and be consistent with achieving ungulate population objectives.
Issue Statement

The Department has developed management guidelines for when black bear, cougar, bobcat, or coyote management actions would be recommended as a means to achieve ungulate population objectives using the best appropriate science. WDFW recognizes that predator management can be a viable population management tool to achieve prey population objectives (hereafter referred to as predator-prey management). The Department also recognizes that societal values are often polarized regarding predator management.

Objective 3:

Implement the following guidelines for predator-prey management.

GUIDING PRINCIPLES

WDFW will consider predator-prey management actions using the following guiding principles:

1) Predator and prey populations are managed to ensure the long-term perpetuation of each species while attaining individual species population objectives.

2) Management of predators to benefit prey populations will be considered when there is evidence that predation is a significant factor inhibiting the ability of a prey population to attain population management objectives. For example, when a prey population is below population objective and other actions to increase prey numbers such as hunting reductions or other actions to achieve ungulate population objectives have already been implemented, and predation continues to be a limiting factor. In these cases, predator management actions would be directed at individuals or populations depending on scientific evidence and would include assessments of population levels, habitat factors, disease, etc.

3) Affected co-managers and stakeholders should be consulted prior to taking significant actions.

4) Conservation, ecological, economic, recreational, and societal values will be considered.

5) Any proposed management action must be consistent with federal and state law.

6) Decisions will be based on scientific principles and evaluated by WDFW and when determined necessary by the Department, an external scientific review panel of experts in predator-prey ecology will review the relative risk to all affected wildlife species and habitats.

7) Public education will be incorporated with any predator-prey management actions.

ACTION CONSIDERATION

When the Department decides to take an action, management will be directed at either individual predators or populations and would be primarily managed through:

a. Recreational hunting seasons,
b. Predator removal via:
   1. Specific actions to remove individuals or reduce populations of predators, using licensed hunters/trappers,
   2. Professional contractors such as USDA Wildlife Services (monitored and supervised by WDFW),
   3. Department staff.
ASSUMPTIONS

Certain assumptions apply when considering predator-prey management:

a. The scientific information points to predators having an effect on prey population levels that ultimately impacts attainment of a population management objective.

b. The term “management objective” means a population or management objective identified in a planning document or commonly accepted and used by WDFW for management of that species. The basis for population objectives (outside of a listing status) are assumed to include viable and productive population levels and are often developed in consideration of: current population estimates; harvest history; current harvest levels; currently occupied summer and winter ranges; condition of available forage and other habitat; land use practices; volume and distribution of property damage complaints; landowner tolerance; and public satisfaction.

c. Implementation can apply across a continuum of predator management strategies, ranging from removal of individual or small numbers of animals to population level management across a broad spectrum of geographic scales (from site management to a larger landscape or region). Individual and local population management actions will be addressed as a priority, with ‘population level’ actions considered only when wide scale actions are deemed necessary to attain prey population objectives.

d. Implementation has a reasonable likelihood of attaining the intended management outcome.

Strategies:

Implementation of Predator Management Actions

When WDFW considers predator management actions, the following information would be documented:

a) Define the problem and rationale for a proposed action.
   1. Articulate the biological status (e.g., productivity, survival, population trend) of the predator and prey populations.
   2. Assess the evidence that prey population objectives are not being met due to predation.
   3. Assess the ecological factors other than predation (e.g., winter severity, habitat, disease, etc.) that affect prey populations.
   4. Determine whether population or individual level management actions are appropriate to achieve the intended outcome.

b) Risk assessment – Assess the effect of proposed management actions on:
   1. Predator populations
   2. Prey populations
      i. Level of acceptable predation.
   3. Other species (e.g., trophic cascades)
   4. Habitat
   5. Recreational opportunity
   6. Landowners
   7. Stakeholders who might be for or against actions.

c) Proposed Action:
   1. Define geographical boundaries.
   2. Identify which predator species are affected.
   3. Identify prey or other species that may be affected by the proposed action.
4. Describe the predator removal methods to be used.
5. Project the expected outcome/objective.
   i. Include scientific information that addresses the expected effectiveness/success of predator control actions.
   ii. Likelihood of successfully achieving objectives and how success is measured.
6. Develop a monitoring plan to evaluate effectiveness prior to and following the control actions.
7. Define a timeline for evaluating action.

d) Public Review:
   1. Stakeholder discussions as appropriate
   2. SEPA/NEPA review when appropriate
   3. Commission action when appropriate

**Wolf Recovery**

Wolf recovery will continue to be managed under the Washington’s Wolf Conservation and Management Plan (Wolf Plan) that was adopted by the Fish and Wildlife Commission in December of 2011. The Wolf Plan lays out the recovery objectives of at least fifteen successful breeding pairs of wolves for three years distributed across the state in three recovery zones, or eighteen successful breeding pairs distributed across the state in three recovery zones in one year.

Key issues such as wolf-livestock conflict and wolf impacts on ungulate populations are addressed in the Wolf Plan and will continue to be implemented consistent with that plan. The 2009-15 Game Management Plan identified wolf recovery as an important issue for management of game species with strategies associated with completion and implementation of the Wolf Plan and monitoring impacts to ungulate species. The wolf population in Washington has grown since the first pack was documented in 2008. The number of packs, successful breeding pairs, and the minimum number counted each year has increased substantially between 2008 and 2013. Currently, there are thirteen documented packs and five breeding pairs which are established in two of the three recovery regions identified in the Wolf Plan. With the rate of wolf re-colonization observed to date in Washington, the Department is anticipating that recovery objectives may be reached during the term of this plan.

**Issue Statement**

Once wolf delisting objectives have been achieved, wolves can be considered for down listing or delisting. A population model developed by Maletzke et al. in (in press) has been tracking well with Washington’s wolf population growth and predicts that recovery objectives will be reached by 2021. The Department is currently accepting information for a pending status review for wolves and, subsequent to that review, will continue to conduct reviews of wolf status at least every five years. These reviews shall include an update of the species status report to determine whether the status of the species warrants its current listing status or deserves reclassification. All status reviews will be consistent with WAC 232-12-297 and the State Environmental Policy Act (SEPA).

Once wolves have achieved the recovery objectives in the Wolf Plan, a status review (as noted on page 68 of the Wolf Plan) will be prepared for the Fish and Wildlife Commission and it will
possibly include a recommendation for a change in status. If the recommendation was to de-list, then the Commission will be asked to consider classification of wolves as either:

1. Protected: Meaning they would not be hunted, but could be killed if causing property damage issues.
2. Game animal: Meaning they can only be hunted under rules created by the Commission, and they could also be killed if causing property damage.
3. Un-classified: They could leave wolves un-classified which would mean they are not protected.

The inclusion of wolf management strategies in this Game Management Plan does not pre-suppose classification status of wolves after they are delisted. Although the Wolf Conservation and Management Plan states (page 70) that “…it is anticipated that the WDFW would recommend listing as a game species”. It is also stated that “Proposals to hunt wolves following delisting would go through a public process with the Fish and Wildlife Commission. This process would address the diverse public values regarding the hunting of wolves.”

This series of decisions by the Commission will likely be very contentious. Even with a majority of Washington citizens expressing support of hunting of wolves to maintain population objectives, reduce depredation of livestock, and address ungulate declines, there is substantial opposition to hunting of wolves (Duda, 2014).

The only objective for wolf management identified in this Game Management Plan is to implement the Wolf Conservation and Management Plan. Several key strategies are listed including initiation of a post-delisting management plan for wolves. With the continued controversy anticipated with wolf management after they have reached the recovery objectives identified in the Wolf Plan and the fact that the Wolf Conservation and Management Plan took five years to complete (2007 to 2011), it is apparent that planning efforts for when wolves have met delisting objectives need to be initiated. The Fish and Wildlife Commission stated the need for a post-delisting plan to begin immediately in their wolf management policy statement issued in 2012. Again, this does not pre-suppose the outcome, only identifies the planning process that would be implemented.

**Objective 4:**


**Strategies:**

a. Monitor wolf population status and trend annually and provide a status report each March.
b. Manage wolf-livestock conflicts to minimize impacts to producers and wolf recovery.
c. Manage ungulate populations to maintain prey populations and harvest opportunities.
d. Develop and implement a comprehensive outreach program.
e. Draft an independent plan by 2018 for how wolves will be managed after recovery objectives have been achieved.

1. Utilize the Wolf Advisory Group to guide the Department’s development of a post delisting management plan. At a minimum the post delisting management plan will include:
   i. Management Goals and Objectives
   ii. A description of how wolves will be monitored
   iii. Wolf-livestock conflict management

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2. The post delisting management plan development will go through the State Environmental Policy Act (SEPA) process and will encourage public involvement including:
   i. A public scoping survey
   ii. Conducting a random public opinion survey
   iii. Public meetings
   iv. Public review and comment of the draft plan
3. The Fish and Wildlife Commission will be asked to consider adoption of a post delisting wolf management plan through a public hearing process.

Recruitment and Retention of Hunters

This issue is becoming one of the most important issues for Fish and Wildlife Management Agencies across the country. In the past couple of years, there has been a slight resurgence in the number of hunters participating in hunting nationwide. In Washington, the number of deer hunters was maintained for a period; however declines have occurred during the past few years. Elk license sales have been at an all-time high over the past ten years, while those who actually participate have remained stable. The greatest declines in hunter numbers have been among small game hunters. In particular, the numbers of waterfowl, forest grouse, and pheasant hunters have dramatically declined over the past thirty years.

Issue Statement

In recent times, adjustments to license types and fees as well as increases in funds from the federal excise taxes on sporting arms and equipment have generated significant revenue for the Department’s conservation and management actions. This has occurred even though the number of individuals purchasing hunting licenses each year has been decreasing. This revenue stream has allowed the expansion of access and wildlife conflict programs in recent years as well as significant improvements in research, annual surveys, and monitoring of game species, which in turn, increases opportunity for hunters. However, fee increases may also result in declines in hunter numbers. To maintain hunter numbers and revenue for the conservation of wildlife, current hunters must be encouraged to participate more frequently and hunters who have quit hunting must be encouraged to return, and efforts to recruit new hunters must be expanded.

Objective 5:

Increase the number of hunters who hunt each year rather than every couple of years, and create incentives for those who have stopped hunting to participate once again. Increase the number of hunters participating for the first time in Washington.

Strategies:

a. Develop a stakeholder group to advise the Department on ways to recruit, retain, and re-activate hunters.

b. Develop a plan that (at a minimum) includes:
   1. A summary of research into the reasons hunters quit and why hunting is less popular than in past years.
2. Survey intermittent hunters to understand why they only hunt every few years; hunters who stopped hunting within the past few years; and hunter education class graduates to see why they do not decide to hunt.

3. Techniques employed by other states to recruit and retain hunters. Survey of general residents and/or other outdoor recreationists to identify demographic groups that are willing to participate in hunting but have never purchased a license.
   i. Identify barriers to hunting participation by potential participants.

4. Incentives to encourage participation from:
   i. Seniors
   ii. Hunters with disabilities
   iii. First time hunters
   iv. Female hunters

5. Key actions or strategies that Washington should implement to be effective in recruiting and retaining hunters.
   c. Implement the actions and strategies in the plan.
   d. Monitor the effectiveness of the actions.

**Hunter Ethics and Fair Chase**

This issue is related to improving the public perception of hunters and support for hunting as a wildlife management tool. This is a very significant issue to hunters, as identified during the 2002 public involvement process. Different people define fair chase in different ways.

**Issue Statement**

Many hunters think that the latitude to determine what constitutes fair chase belongs to the individual. They feel that others should not determine what fair chase is for someone else. Other hunters are concerned that the image and standard of ethics for hunting may be compromised, particularly with the expanding use of technology for hunting. This is especially evident with equipment technology.

**Objective 6:**

During each three-year hunting package, facilitate public debate of regulations for use of electronic equipment and baiting of wildlife for purposes of hunting.

**Strategies:**

a. Conduct public outreach and consider restricting new electronic devices or baiting of wildlife.

b. Develop effective regulations regarding fair chase that are understandable and enforceable.

c. Consider exceptions to new equipment regulations to accommodate the needs of hunters with disabilities.

**Hunter Behavior/Ethics**

Another significant issue for hunters identified during the public involvement process is illegal activity and a desire for greater enforcement presence in the field.

**Issue Statement**

A majority of the general public believes that many hunters violate hunting laws (Duda 2002a). They feel that hunting without a license and poaching are the major violations, and shooting game
out of season and hunting over the bag limit are also common violations. Hunters cite these same concerns with the addition of shooting from a vehicle. The public also indicated, they developed their opinions from direct observation, physical evidence, and from talking with others. In addition, they support hunter refresher courses and feel that an additional training requirement will improve their opinion of hunters.

**Objective 7:**

Improve compliance rates for common violations.

**Strategies:**

a. Emphasize the importance of hunter compliance with regulations and public opinion of hunters in hunter education classes, hunting pamphlets, and other information provided to hunters.

b. Concentrate enforcement efforts on improving compliance for the most common violations.

c. Review and simplify, clarify, or eliminate regulations that are dubious, ambiguous, or confusing.

d. Reduce the number of violations for the top violations over the term of this plan.

**Non-toxic Ammunition**

Concerns continue to be expressed regarding the use of lead ammunition since it is known to be a toxic substance, and there is documented ingestion of spent ammunition and ammunition fragments by many wild birds and mammals. Impacts to wild birds from lead poisoning tend to be much more severe than mammals; however, population level impacts to wildlife other than California Condors have not been well documented. There have also been concerns expressed about potential impacts to hunters and their families from eating game harvested by lead ammunition. Most recently, the state of California passed a law that will phase out the use of lead ammunition for hunting by 2017.

The Washington Department of Fish and Wildlife Commission has a history of addressing concerns with the use of toxic shot when population level impacts can be documented and in areas where deposition or use of lead is likely to be problematic. Lead shot use and possession has been prohibited for all waterfowl hunting in Washington since a nationwide phase-in of nontoxic shot was implemented in 1986-1991. Beginning in 2000 and phased in through 2009, the Commission expanded nontoxic shot requirements for hunting all upland birds, doves, and band-tailed pigeons on all pheasant release sites. The Commission has also regulated the use of lead sinkers for fishing in lakes used by loons. A continuing problem in Washington is the poisoning of swans that consume lead shot deposited before it was banned for waterfowl hunting.

While alternatives have been developed for many of the popular types of shot and bullets, there have been concerns expressed about the limited quantities available; concerns that ammunition for some of the smaller calibers have not been extensively produced yet and that the availability of small shot sizes is limited; concerns that the non-lead alternatives are more expensive than some of the more common ammunition used for hunting and shooting; and there continue to be concerns expressed about damage to older types of firearms.
**Issue Statement**

A wide variety of birds may consume spent lead shot, resulting in increased mortalities and sublethal effects. Birds of prey may ingest lead as they scavenge animals (e.g., deer) taken during hunting seasons. In Washington, there is increasing evidence of lead consumption by golden eagles, a species of concern with low population levels (see [http://wdfw.wa.gov/conservation/research/projects/raptor/golden_eagle_ecology/](http://wdfw.wa.gov/conservation/research/projects/raptor/golden_eagle_ecology/)). However, some sportsmen are concerned that the added expense of purchasing non-toxic ammunition is not justified with population-level impacts and may further reduce hunter recruitment and retention.

**Objective 8:**

Reduce the availability and use of lead ammunition where lead poisoning of wild birds is problematic.

**Strategies:**

a. Survey Washington hunters regarding their ammunition preferences; concerns for both lead and non-toxic ammunition; relative knowledge of the issues; and their levels of support for the development of mechanisms to reduce the use of lead ammunition.

b. Survey Washington’s general public to better understand their relative knowledge of the issues; their levels of support for the continued use of lead ammunition; and the development of voluntary programs and/or regulatory mechanisms to eliminate use of lead ammunition.

c. Develop voluntary programs to encourage hunters to utilize lead alternatives.

d. Develop an outreach plan that helps hunters understand the lead ammunition issues and gain support for reducing the use of lead for hunting.

e. Work with hunters to develop restrictions that are supported and effective at reducing lead poisoning of wildlife.

f. Promote use of non-toxic ammunition for department activities, where applicable.

**Tribal Hunting**

Native people have their own unique tradition, culture, and values related to hunting game and gathering traditional foods and medicines. Many tribes also have reserved rights to hunting and gathering in the language of the treaties signed with the United States. These rights allow tribes to manage their hunters, often with different seasons and rules than non-tribal hunters. This has led to frustration, anger, and misunderstanding on the parts of both tribal and non-tribal citizens. At the same time, limited state-tribal coordination has made it difficult for tribal and non-tribal wildlife managers to do their jobs of managing harvest and protecting game populations.

**Issue Statement**

Non-Indian hunters often do not understand the treaty hunting rights issues, leading to anger and frustration.

**Objective 9:**

Increase public understanding and acceptance of treaty hunting rights.

**Strategies:**

a. Develop an outreach package that can be sent to citizens concerned about tribal hunting.
b. Develop cooperative management programs that demonstrate state and tribal management programs.

c. Link the WDFW website to tribal websites with information on tribal harvest statistics.

d. Continue to include a segment on tribal hunting rights and tribal management activities as part of the Hunter Education Program.

**Issue Statement:**

Improve coordination of treaty and non-treaty hunting and wildlife management.

**Objective 10:**

Complete additional coordinated tribal/state harvest management plans for species such as deer, elk, mountain goat, bighorn, and/or cougar populations subject to both tribal and non-tribal hunting.

**Strategies:**

a. Use existing herd plans to develop coordinated harvest management plans or MOUs for elk herds or other game species. The MOUs should include harvest objectives that are sustainable and meet the needs of both state and tribal hunters; result in sharing of harvest information and hunting regulations; encourage cooperative research and population monitoring; and supports both party’s interests in gaining access to lands for hunting.

b. Based on tribal interest and availability, pick key populations in each treaty ceded area as a starting place to build working arrangements and processes for developing coordinated harvest management plans.

**Hunting Season Regulations**

The Washington State Legislature provides the directive: “*The commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens, including juvenile, disabled, and senior citizens.*” (RCW 77.04.012).

In hunter opinion surveys, most hunters expressed general satisfaction with their hunting experience. Harvesting an animal (hunter success) and seeing plenty of game were the main factors driving hunter satisfaction. It is fairly clear that harvest success plays a significant role in hunter satisfaction.

**Issue Statement**

Hunters feel that seasons are still too crowded and regulations too confining. In addition, they say that seasons are too short for their group or too long for others, success rates are too low, antler restrictions on deer and elk are too onerous, and overall, there is not enough game.

**Objective 11:**

Maintain hunter satisfaction and participation at or above 2014 levels for the life of this plan.

**Strategies:**

a. Consistent with population goals and objectives, conservation principles, and social constraints, develop and maintain a variety of deer and elk hunting season opportunities within each administrative district of WDFW:
1. Provide sufficient hunting opportunities for archers, muzzleloaders, and modern firearm hunters to approach average statewide participation rates and seek to generally equalize success rates where possible. Address additional “fairness” issues between users through the Allocation Committee of the Game Management Advisory Council and recommend changes supported by the Council. Provide general season antlerless harvest opportunities approximately equal to recruitment in Population Management Units (PMUs) (these are combinations of GMUs) meeting population objectives. Provide harvest opportunities that exceed recruitment in populations that are above objectives.

   i. Provide general antlerless opportunity to users in the following order of priority:
      • Youth hunters
      • Hunter’s with disabilities
      • Senior hunters

2. Provide antlerless opportunity to archery or muzzleloader hunters if needed to equalize success rates with modern firearm hunters, or equally between weapon types if success rates are nearly equal.

3. Support the Master Hunter program by providing members primary consideration in hunting efforts designed to resolve private land and sensitive damage issues.

b. Districts should retain general season opportunity whenever possible. Use other techniques to manage harvest rates within a population management unit before considering permit only restrictions.

c. While striving to achieve population goals, maintain season length as a second priority to maintaining general seasons. Use other techniques to manage harvest rates, such as timing, antler points, etc.

Urban Hunting Issues

Since early in the history of Washington, wildlife management has focused on hunting as the primary means of managing wildlife population levels and for funding wildlife conservation. As the human population grows and expands or dominates the landscape, this traditional wildlife management technique is being challenged. Increasingly, the demand for resolution of wildlife population problems also includes the constraint that hunting is a less acceptable method of alleviating conflicts. Unfortunately, the concept of general public responsibility for wildlife problem resolution has not risen to a level of political support that results in adequate funding from general taxpayers.

Issue Statement

As the number of people in the state increase, citizen demands for resolution of conflicts with wildlife are expanding. At the same time, constraints to address perceived safety issues, noise levels, and the nuisance associated with hunter management results in significant challenges.

Objective 12:

Develop at least five local level plans or significant actions designed to resolve wildlife/human problems.


**Strategies:**

a. Assist local governments in identifying current and potential issues for wildlife/human conflicts.
b. Support conflict resolution that includes hunting as a principal means of state funded resolution.
c. Recommend alternative conflict resolution techniques for local government consideration and funding.
d. Develop model ordinance language for local governments that supports hunting as the primary wildlife population management resolution provided by the state.

**Communication Issues**

Communication between the Department and the public was a very consistent and important issue to the public that was identified in the 2008 opinion survey.

**Objective 13:**

Improve the Department’s rating on game management communication by 2021.

**Strategies:**

a. Expand the use of email to communicate with those directly affected by game management decisions.
b. Expand the use of the Department’s website to explain game management policy and direction and the rationale behind decisions related to game management.
c. Continue the use of news releases (magazines and newspaper) to facilitate media coverage of important game issues.
d. Expand the use of the hunting regulation pamphlets to provide information regarding game management.
e. Hire a consultant to conduct a comprehensive review of game management communications to improve effectiveness, credibility, and public support by 2016, including emerging technologies and social media.
f. Conduct a public opinion survey in 2020 to determine how the Department rates on game management communication.

**Plan Monitoring**

In order to clearly identify accomplishment of the objectives identified throughout this plan, a “report card” will be prepared by the Game Division. This list of accomplishments will clearly demonstrate public accountability associated with implementation of the Game Management Plan.

**LITERATURE CITED**


_____. 2002a. Washington residents’ opinions on and attitudes toward hunting and game species management. Responsive Management, Harrisonburg, Virginia, USA.

_____. 2002b. Washington hunters’ opinions on and attitudes toward hunting and game species management. Responsive Management, Harrisonburg, Virginia, USA.


PRIVATE LANDS HUNTING ACCESS

I. HUNTING ACCESS STATUS AND TREND

The state of Washington has had agreements or contracts with private landowners to improve habitat or provide hunting access almost since the initial formation of the Department of Game in the early 1900s. Since approximately half of the state is in private ownership, private lands represent a vital component of habitat for wildlife species and outdoor recreation. Historically, hunter access programs in Washington have resulted in response to landowners charging fees for hunting or otherwise limiting or closing access.

In 2012, WDFW had agreements with 513 landowners which provided hunting access to over 1,000,000 acres. Most of this contracted acreage is in eastern Washington and associated with agricultural lands. A smaller number of formal agreements also exist in western Washington, especially for waterfowl hunting. Less formal relationships fostering hunting access have occurred throughout the state, but have been especially important on industrial timberland in western Washington.

Recent trends in the amount of private land available for public hunting have become a cause of concern among hunters and the Department. There has been an overall decline in contracted acreage as well as a proliferation of fee access programs by major landowners that limit hunter numbers. Historically, common landowner concerns have included liability, property damage, and safety. While “hunt clubs” have been on the agricultural landscape for years, deriving income from recreation has become a more recent landowner objective with large corporate landowners. WDFW has responded by offering landowners cash incentives in localized high priority areas, but addressing large acreages in this manner on a statewide basis is beyond what existing budget resources can support.

II. RECREATIONAL OPPORTUNITY

A 2009 survey of hunters (Duda et al., 2009) regarding access indicated that over half of the hunters surveyed either strongly (41%) or moderately (17%) agreed that lack of access had affected their hunting. Approximately 47% of hunters in the same survey indicated that they spend about half or more of their time hunting on private lands. The importance of access to hunters is obvious and the declining trend is a cause for concern.

WDFW has five program types for landowners who participate in agreements to provide hunting access as follows:

- **Feel Free to Hunt** – Is the least restrictive for hunters who can simply go to a site and hunt without registering or needing to make any kind of advance arrangement.
- **Register to Hunt** – Is similar, but requires that hunters complete an onsite registration form before hunting and sometimes submit a daily report of harvest before leaving the site. The number of hunters allowed at any one time is sometimes limited by designating a limited number of parking spaces which when full; indicates that no more hunters are allowed.
• **Hunt by Written Permission** – Requires hunters to obtain a written permission form from the landowner before hunting. The landowner’s contact information is included on signs posted around the property.

• **Hunt by Reservation System** – First used in 2013, is the newest option and has been well received by landowners and many hunters. This option requires that hunters make an advance reservation through a self-service online system before arriving at the site to hunt. Landowners have an online portal that they can use to view the reservations made and the names of hunters who will be on their property. The reservation system gives both WDFW and landowners a high degree of control in tailoring how hunts are managed on each site by allowing for rest periods and limited group sizes.

• **Landowner Hunting Permit** – This program is used where WDFW has negotiated access to unique or high quality hunting opportunities. It also provides for the flexibility of customized seasons managed with special permits.

### III. DATA COLLECTION

On an annual basis, WDFW compiles and summarizes basic information related to landowner contracts. Acreages are totaled by county for the various types of access programs and included in the annual Game Status and Trend Report. Many other landowners certainly allow access outside of WDFW programs, but these opportunities are not closely monitored. WDFW has also conducted surveys of landowners and hunters to help identify concerns and set priorities for the program. In 2013, program staff began an inventory of private industrial timberland that was in fee access programs in western Washington. Based on this inventory, WDFW anticipates that at least a quarter of the state’s private industrial timberland could be in some type of landowner fee permit system by the 2014 hunting season.

### IV. MANAGEMENT GOALS

The statewide goals for private lands are:

1. Engage landowners, provide technical advice, and encourage them to maintain and enhance habitats to sustain healthy and productive wildlife populations.
2. Engage landowners and provide them support and resources to increase the availability of private lands to the public for recreation to include: Hunting, fishing, and wildlife viewing.
3. Address costs associated with providing recreation and the economic needs of landowners, while striving to minimize direct costs to recreational users.

### V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

#### Habitat Management

**Issue Statement**

WDFW has a long history of working with landowners to improve a wide range of wildlife habitats. One of the keys to landowner participation in WDFW’s access programs is the technical support provided by field staff to assist landowners with meeting the requirements of the federal farm bill conservation programs. Cuts to these federal programs have affected landowner participation, but newer programs have offered new opportunities through grants to states.
**Objective 14:**

Maintain a strong team of thirteen private lands biologists statewide to assist landowners with habitat enhancements and provide recreational access. Utilize Farm Bill and state fund sources to enhance habitat under a minimum of 400 landowner agreements by 2021. Submit at least one proposal for permanent additional funding for habitat and access incentives.

**Strategies:**

a. Provide information to elected officials outlining the public benefits of existing programs and support any new federal legislation that would fund habitat or access incentives.

b. Continue to utilize state migratory bird stamp, eastern Washington pheasant enhancement, and turkey tag revenue to offer landowner incentives for enhancing habitat and public access.

c. Develop at least one state legislative proposal to increase funding for landowner incentives.

d. Where landowners have elected to charge fees to hunters, encourage use of the permit income for habitat enhancement.

**Population Management**

**Issue Statement**

Hunting can be an important mechanism to alleviate damage caused by wildlife on private lands. Landowners who incur damage caused by game animals must allow public hunting access in some form to be eligible for some types of assistance from WDFW. A variety of options exist depending on the specific situation and location. Refer to the Wildlife Conflict Chapter for more information on conflict management.

**Objective 15:**

Evaluate the suite of hunting options to address wildlife conflict situations and adapt as needed to best meet landowner needs and maximize opportunities for hunters. Require a close working relationship within the Wildlife Program at all levels (between private lands, wildlife conflict, and district wildlife biologists). By 2017, improve information available to hunters to help them locate areas where damage by game animals is occurring.

**Strategies:**

a. Identify areas with chronic wildlife conflict issues.

b. Improve coordination between district biologists, private lands biologists and conflict staff, to enhance landowner relationships and provide public access in chronic conflict areas.

c. Develop a method for hunters to locate damage areas where landowners may need hunters to address damage caused by game on their property.

**Recreation Management**

**Issue Statement**

The availability of private lands for hunting has become more limited or restrictive in recent years and is affecting overall recreational opportunity. Historically, WDFW and hunters have competed with organized hunt clubs or other types of exclusive leases for hunting access on agricultural lands or smaller ownerships. Until very recently, general limitations on hunter numbers or fees by corporations on vast ownerships, was not common. As of 2014, WDFW staff compiled a list of
over 1.3 million acres of private industrial timberlands in western Washington that had implemented fee access permit or lease programs that also capped hunter numbers. This represents over one quarter of the state’s private industrial timberland. Washington law (RCW 4.24.210) has limited the liability of landowners who allow recreational access without charging a fee. Landowners who charge fees must purchase insurance to protect themselves from lawsuits by their permittees. A change to this law is currently under consideration, which would allow landowners to charge limited fees as long as they do not limit the number of users allowed. This proposal recognizes that landowners often incur costs associated with allowing recreation on their land and would allow them to recoup those costs.

In some cases, access to public lands has been affected by private land closures or limitations. Access for the public on some public lands is not secured and recreation is in effect controlled by private landowners where public right of way is not established.

WDFW increased field staffing levels in all regions to work with private landowners to expand public access. Generally, the strategies used have centered on reducing landowner costs associated with allowing access. These kinds of measures have included providing signage, monitoring public use, enforcement, and other incentives. In recent years, WDFW has begun to use cash incentives to increase landowner interest in localized priority areas, but funding limits currently preclude using this approach on a larger scale.

**Objective 16:**

Continue to utilize available resources and foster the development of new incentives to increase landowner participation in WDFW access programs and increase acreage enrolled to 1.3 million acres.

**Strategies:**

a. Continue to work closely with landowners to mitigate their costs, and provide traditional incentives to facilitate recreational access on private lands.

b. Seek and review other plans and efforts to improve outdoor recreational access and take advantage of opportunities to combine resources to maximize potential benefits.

c. Develop new materials that inform landowners about the programs and services offered and make available on the Department’s website and other formats.

d. Where possible, encourage landowners who feel they must charge fees to keep costs low and not limit the number of individuals who may obtain a permit.

e. Within available budgets, continue to utilize monetary incentives in high priority areas where this approach is already in use.

f. Develop criteria to evaluate and prioritize where cash incentives to facilitate access are most needed and would have the greatest benefit.

g. Seek or leverage funding from other sources to increase the capacity to offer incentives to landowners. Submit proposals that may increase permanent funding.

h. Request or support legislation that encourages landowners to allow free access or low-cost permit programs that do not limit participation.

i. Develop other methods beyond enrolled acreage to measure success of the private lands program such as hunter days provided and hunter harvest.

j. Encourage landowners to make accommodations for disabled hunters, and provide hunters with information about where these opportunities exist.
k. Continue to review requirements for public hunting access in situations where WDFW provides assistance with wildlife damage, and look for ways to leverage or require general season hunting access as a condition of that assistance.

Objective 17:
Complete an inventory of public lands by 2016. Evaluate situations where access is closed, impaired, or at-risk of closure by private landowners not allowing access, and develop a strategy to address these issues.

Strategies:

a. Develop a system to inventory where private ownership is restricting access to public lands in Washington. Classify land blocks as secure, closed, impaired, or at-risk of a reduction in public access.
b. Prioritize areas and work with landowners and other agencies to secure or improve access through private land to public land.
c. Seek funding in cooperation with other public landowners to secure easements or fund agreements that provide public access to public land.
d. Monitor exchanges or sales of public lands to identify situations where transactions could limit or otherwise affect recreational access.
e. Develop informational materials that convey the status of public land access and the need to address access to landlocked parcels.

Issue Statement
WDFW launched a new access program in 2013 that allows hunters to make advance reservations to hunt on selected properties enrolled in hunting access agreements. The current Hunt by Reservation System is considered an interim solution and does not include all of the desired features. The system appears to be popular with the hunters who use it and the landowners in the program, but surveys to measure satisfaction and opinions have not been conducted since the program began. The current reservation system operates strictly on a first-come, first-served basis with all reservations becoming available with the same lead time. While this has been acceptable for some properties, it has been a point of dissatisfaction among some users.

Objective 18:
By 2016, make improvements to the current reservation system that allow drawings for some reservations and adds flexibility as to when reservations first become available to the public. Add other features to meet the needs of hunters and landowners, and make the program more efficient to administer.

Strategies:

a. Conduct surveys of system users to measure satisfaction with the program and seek suggestions for improvements.
b. Add the ability to conduct drawings to the current system.
c. Improve the system to help better inform users of program rules, such as listing all hunting partners on the permit.
d. Explore options to develop a fully automated system that meets all of the desired system improvements; is funded by users; and linked to the WDFW license system.
e. Include an automated approval and update process for sites in the program to make the information available to users more quickly.

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**Issue Statement**

Improving the availability of information about the location and features of lands providing public hunting access is frequently cited as a desire of hunters. Information on private lands in agreements with WDFW was improved during the development of the interim reservation system, but not all sites currently have this improved information available.

**Objective 19:**

By the beginning of 2015, assure that all landowner access agreements are included in the private lands database, and add the ability for hunters to locate properties meeting their needs on the WDFW website by adding a search tool. Improve and update information about access opportunities included in written materials and hunting pamphlets.

**Strategies:**

a. Enter site data and information for all landowner agreements and update annually as appropriate.

b. Improve the ability of users to search for sites offering opportunities by species, ADA accessibility, and other features.

c. Link hunting access information to pages with information on the various game species and seasonal hunting prospects.

d. Consider development of a phone application that would assist hunters with identifying access opportunities while in the field.

e. Continue to use signage around sites as a primary method of identifying lands that are available for recreation. Assure that signs are posted prominently and at frequent intervals. Improve information regarding the Private Lands Access Program in hunting pamphlets, and develop other written materials for hunters and landowners. Include educational materials that encourage hunters to respect the landowner and their property.

f. Make contact information for private lands staff available on the agency website as a resource for hunters looking for access opportunities.

**VI. LITERATURE CITED**

I. CONFLICT STATUS AND TRENDS

Human-wildlife interactions will likely continue to increase over time as Washington’s human population expands. In addition, there is increasing public demand for recreational use of Washington’s wildlands, which brings more people into contact with wildlife. Maintaining healthy wildlife populations while minimizing negative human-wildlife interactions will increasingly rely on informing and assisting the public to employ proactive measures and providing quick effective response once conflicts and property damage occur (Conover 2001).

A 2014 opinion survey indicates that more than a quarter of the Washington public (29%) has experienced negative situations or problems associated with wildlife (Duda et al. 2014). Deer and raccoons were the most commonly named species that had caused problems (35% of those who said they had problems cited deer, 25% cited raccoons), followed by bear (14%), geese (13%), and coyotes (10%) (Duda et al. 2014).

Conflict issues with small game, furbearers, and unclassified species (raccoons, beavers, coyotes) are typically handled using one of three methods:

2. Wildlife Control Operator (WCO); landowner can select and hire a WCO from a list of certified individuals.
3. USDA Wildlife Services; landowner can contract USDA to resolve the human-wildlife conflict situation.

Conflict issues involving public safety with bear, cougar, moose, and wolves are generally resolved by WDFW Law Enforcement. Unfortunately, many of these situations require the use of lethal control measures to remove the offending animal through agency kill authority. In 2013, many wildlife conflict responsibilities were transferred from WDFW Law Enforcement to WDFW Wildlife Program. Presently, non-public safety related conflict issues with deer, elk, turkey, bear (timber damage), and wolf are resolved through the Wildlife Program while Enforcement continues to resolve dangerous wildlife conflicts.

A primary objective of WDFW is to minimize conflict and assist landowners with prevention, mitigation, and when necessary compensation for property damage or loss (as provided by law). An effective strategy for managing negative human-wildlife interaction is to allow staff a degree of flexibility to test and implement new techniques while perfecting existing mitigation tools. WDFW staff will assess each scenario on a case-specific basis and use their professional judgment to determine the best course of action for conflict resolution.

II. RECREATIONAL OPPORTUNITY

In Washington, human-wildlife conflict resolution is a management necessity that at times cannot be resolved using traditional recreational harvest strategies. WDFW has utilized hunters to assist with deer and elk conflict issues and houndsmen and hunters to assist with bear and cougar.
depredation events. In each case, there are criteria that must be met and restrictions in some cases that prohibit the hunter or houndsmen from keeping the animal harvested. Licensed hunters may be issued a damage prevention permit through a Wildlife Conflict Specialist and purchase a Damage Tag to participate in a deer or elk damage resolution hunt and retain the deer or elk. Additionally, Washington allows trappers to become certified as Wildlife Control Operators who then may operate a business to remove nuisance wildlife and be compensated by individual landowners for their efforts.

III. DATA COLLECTION

The WDFW Law Enforcement Program documents human-wildlife conflict complaints that result in an officer responding to an incident. Historically, most complaints called into Law Enforcement involve conflict with cougar, bear, deer, and elk. In 2013, WDFW transferred most wildlife conflict activities from Law Enforcement to the Wildlife Program. The Wildlife Program now handles deer and elk damage permits and damage claims and Law Enforcement continues to log reports of dangerous wildlife situations, per RCW 77.12.885.

IV. WILDLIFE CONFLICT MANAGEMENT GOALS

The statewide management goals for wildlife conflict management are:

1. Improve our understanding and ability to predict human-wildlife conflict issues.
2. Enhance proactive measures to prevent conflict and improve Department response to wildlife conflict events.
3. Minimize, mitigate, and manage wildlife conflict events to maintain human tolerance and perpetuate healthy and productive wildlife populations.

V. ISSUE STATEMENTS, OBJECTIVES AND STRATEGIES

Deer and Elk Damage to Commercial Agriculture

Issue Statement

Farming is a vital part of the Washington’s economy. The lands that support this industry also provide wildlife habitat and forage opportunities for deer and elk, which may result in crop damage. Landowner tolerance for deer and elk damage depends on how quickly and effectively the Department responds to mitigate damage (Washington Department of Fish and Wildlife 2008). The Department is committed to providing technical assistance for minimizing and mitigating damage. Damage resolution may be achieved through use of non-lethal or lethal measures. Whereas the Department generally promotes the use of non-lethal measures prior to lethal action, there are occasions where lethal removal may be necessary. Washington residents historically have supported the use of hunting as a tool for damage prevention and mitigation (Duda et al. 2008a, Washington Department of Fish and Wildlife 2008, Dietsch et al. 2011, Duda et al. 2014). Majorities of Washington residents support hunting for the following reasons: To address nuisance animals (73% of Washington residents strongly or moderately support hunting for this reason), to address human-wildlife conflicts (67%), and to control wildlife damage to private property (62%) (Duda et al. 2014).
**Objective 20:**

Respond to wildlife damage complaints to private agricultural crop lands within 72 hours, and increase the number of WDFW agreements used to mitigate deer and elk damage issues by 10% during the period 2015-2021.

**Strategies:**

1. Provide agriculture producers with information materials to proactively address deer and elk damage issues and to improve the Department’s ability to respond to agriculture crop damage from deer and elk.
2. Promote the use of WDFW agreements to commercial landowners and lessees, and encourage non-commercial agriculture landowners to use non-lethal conflict prevention measures identified on a prevention measures checklist.
3. Promote participation in conflict prevention/resolution by Treaty Tribes.
4. Use hazing and other non-lethal measures to resolve damage; with emphasis placed in areas where the feasibility of lethal action is limited or ungulate populations are below management goals.
5. Encourage recreational harvest in areas with chronic crop damage.
6. Implement actions to encourage private land owners to consider, purchase, and use deer/elk fencing as part of their new and long-term business practices.
7. Expand the use of cooperative fencing projects in chronic damage areas with emphasis on high-value crops.
8. Facilitate the deer/elk depredation program (including agreements, permits, and claims process) to improve WDFW’s response to landowners experiencing agriculture damage.
9. Assess the feasibility of using partnerships and cooperators to assist with crop damage issues.
10. Increase the number and accessibility of crop assessors on contract statewide.
11. Utilize agency kill authority and depredation permits for problem crop damage areas.

**Carnivore (bear, cougar, wolf) Depredation on Livestock**

**Issue Statement**

Livestock production, similar to farming, is an essential component of Washington’s economy. In addition to minimizing loss and injury of livestock and maintaining landowner tolerance of carnivore species there is increased concern for public safety. Protecting people from dangerous wildlife while maintaining sustainable wildlife populations, is a primary objective of the Department. The Department utilizes both non-lethal and lethal techniques to provide landowners with assistance for minimizing livestock loss or injury caused by carnivores. Washington residents historically have supported the use of hunting to address human safety and prevent loss of livestock (Washington Department of Fish and Wildlife 2008, Dietsch et al. 2011 and Duda et al. 2014).

**Objective 21:**

Maintain or decrease livestock depredation levels over the period 2015-2021.

**Strategies:**

a. Provide livestock producers and owners with printed information materials to minimize conflict with carnivores.
b. Promote the use of WDFW agreements for livestock to commercial livestock producers, and encourage the use of a non-lethal prevention measures checklist.

c. Promote the use of non-lethal conflict prevention measures and a prevention measures checklist to non-commercial producers.

d. Develop response protocols for carnivore depredation on livestock.

e. Use hazing and other non-lethal prevention measures to minimize potential loss or injury.

f. Encourage recreational harvest (black bear and cougar), where feasible, in areas with chronic depredation events.

g. Review and improve the techniques used for lethal removal of offending animal(s).

h. Utilize agency kill authority and depredation permits, when feasible, for carnivore depredations on livestock, consistent with state and federal law.

**Urban Wildlife Conflict**

**Issue Statement**

Urban wildlife is a valuable natural resource; providing the public with opportunities to observe and experience wildlife. However, sometimes wildlife can damage property or threaten human safety. Rather than immediately resorting to removal of a species, deploying proactive prevention methods can deter human-wildlife conflict issues within urban areas. Public tolerance and appreciation of wildlife species is an important component of human-wildlife conflict management (Conover 2001). While it is impossible to eliminate human-wildlife conflict, many human-wildlife conflict situations in urban areas can be avoided through the use of exclusion techniques, removal of unnatural food resources, and education about of wild animals and their living requirements.

**Objective 22:**

Decrease or minimize the number of urban human-wildlife conflict calls requiring WDFW response so that the number of calls is constant or declining over the period 2015-2021.

**Strategies:**

a. Develop a program to track the number of calls requiring WDFW response.

b. Distribute informational materials to increase public awareness about ways citizens can better coexist, through use of preemptive actions, and respond to wildlife in urban areas.

c. Develop and promote activities and programs (e.g., volunteer hazing to scare animals away) that reduce the likelihood of human-wildlife conflict in urban areas.

d. Promote the development of local ordinances, rules, and regulations (e.g., fines, prohibiting feeding, etc.) which local governments can utilize to minimize human-wildlife conflict.

e. Promote collaboration with local governments to co-manage conflict issues with select species in urban areas.

f. Identify priority areas where changes to wildlife conflict management response may be necessary.

**Black Bear Tree Depredation on Commercial Timberlands**

**Issue Statement**

During the spring, when black bears are emerging from dens, high nutritional value food resources are limited. Bears will often seek sapwood as a preferred food resource because of its high sugar content. Trees with high growth rates, typically found on commercial timberlands, contain the
highest sugar content and therefore are the most vulnerable to depredation. Damage to commercial timberlands can, at times, exceed one-third of the trees in a given stand; resulting in economic losses for landowners (Washington Department of Fish and Wildlife 2008).

**Objective 23:**

Improve and expand WDFW’s black bear tree damage program, by incorporating alternate strategies beyond existing techniques, which will result in an overall 10% reduction in the number of permits requested to lethally remove black bears for timber damage while maintaining or decreasing the amount of bear caused timber damage over the period 2015-2021.

**Strategies:**

a. Conduct a review of existing data and current processes to understand the current level of complaints and response; and identify and prioritize areas that may need management improvements.

b. Develop a black bear timber depredation program that includes proactive non-lethal prevention measures, methods to validate damage, options for lethal removal prevention (during and post damage seasons), collaboration with other entities for testing and evaluating damage and prevention techniques, and methods to evaluate the efficacy of the program.

c. Provide information to landowners on damage prevention tools and promote the use of non-lethal measures; where feasible.

d. Develop protocols to assist landowners in assessing bear damage over time.

e. Improve opportunities for recreational bear harvest to minimize potential timber damage.

f. Facilitate the black bear timber depredation program (including applications, permits, and actions) to improve WDFW’s response to landowners experiencing timber damage.

g. Evaluate the potential to use a variety of methods for lethally removing black bears to address timber damage.

h. Provide Department-coordinated lethal removal to mitigate timber damage by bears.

**Communication and Outreach**

**Issue Statement**

Communication between the Department and constituents on human-wildlife conflict prevention and resolution is paramount to increasing the public’s ability to resolve problems with wildlife and to maintain support for wildlife in Washington.

**Objective 24:**

Reproduce and/or update existing conflict prevention outreach materials and create two (2) new conflict prevention publications by 2021.

**Strategies:**

a. Use the top five consumer rated media (e.g., direct mail, internet, newspaper, television, and email) to disseminate information.

b. Develop printed conflict resolution information for distribution to landowners.

c. Improve the WDFW web page to include a “communication matrix” that directs the public to the appropriate point of contact (i.e., WDFW staff, Wildlife Control Operator, other resources) to resolve the wildlife conflict problem.

d. Develop fact pages to clarify rules and regulations related to human-wildlife conflict resolution.
e. Provide continual updates to the WDFW web page regarding rules, regulations, and procedures.
f. Develop educational partnerships for informing the public on how to minimize human-wildlife conflict issues.

**Data Collection**

**Issue Statement**

Lethal removal, through hunting and trapping, of game species (deer, elk, bear, and cougar) and furbearer species is an effective tool for mitigating human-wildlife conflict. It is important to account for removals due to conflict issues when assessing population-level impact and viability of game and furbearer species.

**Objective 25:**

Develop a standardized data collection system for recording complaints and lethal removal of game and furbearer species; searchable by species, location, and resolution.

**Strategies:**

a. Identify areas where changes to conflict management approaches may be needed, e.g., increase recreational harvest.

**Issue Statement**

Measuring the effectiveness of programs and actions taken by WDFW to minimize human-wildlife conflict is essential to providing appropriate response to landowners and maintaining support for wildlife populations statewide.

**Objective 26:**

Conduct a survey of complainants who filed deer, elk, bear, cougar, and wolf complaints to determine the level of satisfaction with WDFW actions for resolving their wildlife conflict complaint during the period 2015-2021.

**Strategies:**

a. Capture complainant contact information when responding to conflict calls.
b. Identify and work with a data collection team to conduct a survey.
c. Evaluate results to develop strategies for addressing human-wildlife conflicts.
d. Implement the strategies identified and use stakeholder groups where necessary.

**Techniques and Tools**

**Issue Statement**

Human-wildlife conflict will likely continue to increase as human populations increase. Although it is unrealistic to expect elimination of conflict issues, there are numerous ways to minimize human-wildlife conflict. Tools and techniques to resolve human-wildlife conflict continue to improve, and new innovative ideas are frequently introduced. To properly manage wildlife conflict issues, the Department must utilize a full spectrum of techniques. Both lethal and non-lethal measures are necessary to provide adequate response to problems and maintain public
tolerance of wildlife. Because wildlife conflict resolution is dynamic and evolving it is imperative that WDFW remain flexible, adaptive, and up-to-date on resolution techniques.

**Objective 27:**
Develop a minimum of two projects to expand, improve, or develop the use of non-lethal harassment, deterrent, or long-term mitigation measures to minimize negative human-wildlife interactions; particularly in: 1) urban areas, 2) areas where species populations are below management objectives, or 3) areas where species are under federal protection during the period 2015-2021.

**Strategies:**
- Identify, explore, and test the use of new non-lethal deterrent measures for wildlife conflict issues, e.g., using dogs to move turkeys from an urban area.
- Provide opportunities for volunteers to assist in wildlife conflict resolution activities.
- Provide opportunities for testing new techniques through pilot studies and collaborative research projects.
- Encourage WDFW staff to engage in activities and programs that may reduce the likelihood of human-wildlife conflict.
- Support collaborative research opportunities that test, assess, and evaluate existing and new conflict prevention and mitigation techniques.
- Use contracts and agreements with landowners to try new techniques, engage in proactive prevention tools, and mitigate potential for compensation associated with human-wildlife conflict.
- Develop new options for providing compensation to landowners outside of annual cash payments.

**Issue Statement**
Wildlife Control Operators (WCO) have an essential role in responding to nuisance wildlife complaints. They assist landowners by providing quick action to resolve conflict issues with small game, furbearers, and unclassified wildlife. Because wildlife conflict issues will continue to rise as human populations increase, WDFW can utilize the WCO in an adaptive management approach to address a variety of human-wildlife conflict issues.

**Objective 28:**
Expand and improve the existing wildlife control operator program to ensure statewide coverage in each county and include comprehensive training and accountability.

**Strategies:**
- Revise the existing wildlife control operator program to include a training program for certification and recertification requirements; including fees.
- Improve the certification process to include more opportunities for certification and a more comprehensive and interactive training program.
- Develop a plan to broaden the type and extent of work in which wildlife control operators can participate to allow more flexibility of their use by WDFW for conflict resolution under WDFW guidance.
- Develop web based or electronic based reporting system for special trapping permits and wildlife control operators to improve customer service and conflict tracking.
- Provide a mechanism for collecting data on non-target species.
Issue Statement

Compensation for property loss and damage can be an effective tool for mitigating human-wildlife conflict events. When proactive measures fail, compensation programs help maintain public support and landowner tolerance for wildlife. These programs must be designed to provide the landowner with a relatively simple process and reasonable reimbursement for their loss.

Objective 29:

Revise statewide standardized compensation programs for crop and livestock loss.

Strategies:

a. Clarify criteria for each claims process.

b. Evaluate and refine existing compensation programs to facilitate a streamlined claims process.

c. Review and consider other methods to provide compensation or resolution for crop or livestock loss as a result of human-wildlife conflict.

VI. LITERATURE CITED


ELK (*Cervus elaphus nelsoni, C. e. roosevelti*)

I. POPULATION STATUS AND TREND

Elk (*Cervus elaphus*) have been present in Washington for 10,000 years (McCorquodale 1985, Dixon and Lyman 1996, Harpole and Lyman 1999). Although complete prehistoric distribution and densities are not yet fully understood, it is known that some form of elk was present in western Washington, on the Olympic Peninsula, on both sides of the Cascade Crest, in northeast and southeast Washington as well as the relatively arid Columbia Basin (McCorquodale 1985, Dixon and Lyman 1996, Harpole and Lyman 1999).

Both Roosevelt elk (*C. e. roosevelti*) and Rocky Mountain elk (*C. e. nelsoni*) are native to Washington (Murie 1951, Bryant and Maser 1982, Spalding 1992). Roosevelt elk are found on the Olympic Peninsula and in portions of southwestern Washington. Based on preliminary genetic work conducted by WDFW, Roosevelt elk on the west slope of the Cascade Crest have interbred with Rocky Mountain elk. Elk occurring in central and eastern Washington are Rocky Mountain elk that either avoided extirpation or were reestablished by reintroductions of elk originating from Montana and Wyoming (Washington Dept. of Game 1939, Washington Dept. of Fish and Wildlife 2001, 2002a, 2002b, 2002c, 2002d, 2005, 2006a, 2006b).

Elk were hunted regularly but not always extensively, by tribes in both eastern and western Washington (McCabe 1981). As European settlement expanded into this region, elk harvest increased dramatically. By the beginning of the 1900s, most if not all of the elk in eastern Washington had been eliminated. Small populations of Roosevelt elk persisted in southwestern Washington and on the Olympic Peninsula (Washington Dept. of Fish and Wildlife 2005).

By the beginning of the last century, Roosevelt elk were greatly reduced in numbers as well, but due to denser forests with more escape cover, small groups of Roosevelt elk were able to persist. Efforts to re-introduce Rocky Mountain elk were conducted from as early as 1912 through the 1930s (Washington Dept. of Game 1939). Elk populations peaked in Washington in the late 1960s and early 1970s mostly due to habitat conditions and forest management practices. A recent marked reduction in timber harvest, especially west of the Cascade Crest, and an increase in the human population in Washington have reduced the overall carrying capacity for elk in Washington compared to decades past. WDFW currently recognizes 10 major elk herds totaling approximately 56,000 to 60,000 animals.

II. RECREATIONAL OPPORTUNITIES

In Washington, elk are hunted from August through December with some special permit hunts to address agricultural damage taking place as late as March. Non-recreational lethal removals to mitigate wildlife conflict can happen year-round. Hunting seasons for archery, muzzleloader, and modern firearms are currently available to both resident and non-resident hunters. There are currently no quotas on the number of general elk season licenses sold. Hunters are required to choose one weapon type and declare whether they will hunt east side or west side elk. For most of eastern Washington, general hunting seasons allow spike-only bull harvest and special permit opportunities allow the harvest of branch-antlered bulls. Currently, “any bull” harvest is allowed
for general season in northeastern Washington. West side elk hunting regulations usually include 3-point minimum antler restrictions. Some western Washington GMUs can only be hunted under limited-entry, special permits. Some “any elk” hunting opportunities exist in parts of south-central and southwest Washington where expansion of elk populations is discouraged. In a recent public opinion survey of hunters in Washington, elk hunters indicated that they prefer less restrictive hunting seasons with more opportunities to harvest a legal animal and with more days available to hunt elk than are currently available (Duda et al. 2002a., 2002b.).

III. DATA COLLECTION

Elk populations are assessed for a variety of characteristics, often including herd composition and population size (Lancia et al. 1996, 2000). Herd composition is an estimate of the proportions of various age and sex classes occurring in the population such as the number of calves per 100 cows, the number of bulls per 100 cows, or the number of spike bulls per total bulls. Age and sex class data alone are not adequate for population management (Caughley 1974, 1977). Data are collected using a variety of techniques, depending on information needs and local conditions. Common tools used to assess elk populations include:

- Surveys conducted by personnel on the ground.
- Aerial surveys with and without visibility (sightability) corrections (Samuel et al. 1987).
- Mark-resight population estimates from air or ground surveys where a known number of animals are marked and then subsequent surveys are conducted and the number of marked and unmarked animals observed. Those data are then used in statistical models to estimate the population as well as a measure of the precision.

IV. ASSESSMENT OF CURRENT MANAGEMENT OF ELK

Background

The Department has developed or is updating management plans for each of the ten elk herds in the state. Herd plans specifically address the unique conservation challenges that face each herd. Elk herd plans, which come under the overall management guidance of this Game Management Plan (GMP), also facilitate cooperative management with tribes. The existing herd plans are an important resource used in implementation of this GMP, and are intended to be updated as needed.

The elk herd management plans include:

- Blue Mountains
- South Rainier
- North Rainier
- North Cascade (Nooksack)
- Yakima
- Olympic
- Colockum
- Mount St. Helens
- Selkirk
- Willapa Hills

Objective 30:

Update the elk herd management plans as needed.
**Strategies:**

Nearly all of the state’s elk herds are being impacted by development and other habitat modification as a result of human population increases.

There are additional factors controlling elk population levels. For some elk herds, the limiting factors that prevent the achievement of population objectives may be known. For others, limiting factors may be more difficult to isolate or the concept of limiting factors may not apply in the strictest sense. The focus of the plans is to identify and correct limiting factors and achieve the population objectives.

- The Blue Mountains elk herd’s limiting factors are likely historic antlerless harvest levels on the Oregon side of the Wenaha, and more importantly, the current lack of regular fire regime in the Wenaha unit. All other units are currently at population objective. Without the benefits of fire in the Wenaha-Tucannon Wilderness, the habitat will not support the desired number of elk and the population objective will need to be reduced.
  - The top spending priorities for this herd are habitat improvement and preservation, wildlife conflict resolution, and annual surveys.

- The South Rainier elk herd is probably limited by direct mortality caused by legal and illegal hunting or undocumented harvest, and secondarily by limited habitat.
  - Securing winter habitat, annual surveys, and an increased enforcement presence are the priorities for this herd.

- The North Rainier elk herd is probably limited by direct mortality caused by legal and illegal hunting, and secondarily by loss of habitat.
  - The priorities for the North Rainier herd are habitat enhancement and annual surveys to document harvest impacts.

- The North Cascade (Nooksack) elk herd is continuing to grow and is not currently limited by the carrying capacity of the elk habitat. If the Nooksack herd is limited, it is probably as a result of agricultural lands adjacent to core elk habitat and the Department’s legal requirements to address wildlife damage.
  - The top priorities are to protect winter range on private land, promote elk habitat quality separate from agricultural lands on the valley floors, and minimize elk damage to agricultural lands.

- The Yakima elk herd is at population objective. Limiting factors affecting this herd will be better isolated when research pertaining to this herd is finalized in a WDFW report.
  - The spending priorities for this herd include habitat conservation, resolving wildlife damage conflicts, and winter-feeding.

- The Olympic elk herd is probably limited by loss of elk habitat to human encroachment and available elk habitat, which is a function of timber management on private industrial timber lands and to a lesser extent, limited timber management on U.S. Forest Service lands.
  - The top priorities identified for this herd are the green forage program, encouraging land managers to consider elk when manipulating habitat, reduction of open roads, and annual surveys.

- The Colockum elk herd is limited by available habitat, hunting, and lethal removals related to resolving agricultural damage.
  - The priorities for the Colockum herd are habitat conservation, habitat enhancement, resolving wildlife damage conflicts, and bull escapement. Additional priorities
include completing analysis of research data collected during 2008-2012; completing the new elk bull movement study; and improving monitoring surveys.

- The Mount St. Helens elk herd is near objective at this writing. The limiting factor for this herd is likely adequate forage. Hoof disease is a major concern for the herd as is understanding the causes, developing the management options, and understanding the implications to overall herd health and population dynamics.
  - The spending priorities for managing this herd are enhancing habitat and continuing comprehensive annual surveys to determine the impacts of harvest strategies. Hoof disease monitoring and management is a high priority for this herd.

- The Selkirk elk herd is likely increasing in numbers and distribution based on harvest data and observations made by WDFW staff. The limiting factor for this herd is probably the amount of habitat created by active timber management and wildlife damage issues occurring on agricultural lands adjacent to elk habitat.
  - The priorities include habitat enhancement, annual surveys, and resolving damage issues.

- Very little is known about the Willapa Hills elk herd. The limiting factors are probably loss of habitat, reduced forage quality, direct mortality resulting from legal and illegal hunting, and potentially from disease concerns.
  - The priority for the Willapa Hills population is to improve survey protocols. Hoof disease monitoring and management is also a high priority for this herd.

V. ELK MANAGEMENT GOALS

The statewide management goals for elk are:

1. Preserve, protect, perpetuate, and manage elk and their habitat to ensure sustainable populations.
2. Manage elk for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, subsistence, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Manage elk populations for a sustainable annual harvest.

VI. BACKGROUND, OBJECTIVES, AND STRATEGIES

Population Management

The primary goal is to manage for viable and productive elk populations with desirable population characteristics using the best available science. The Department measures elk populations using a variety of techniques. Techniques that work well in the more open habitats of eastern Washington may be of little value in areas that are densely forested. Population objectives defined in this plan are consistent with objectives defined in the respective elk herd plans. A realistic approach to the management of wild animal populations does not assume that the true number of animals in the population is known. Therefore, the preferred target for each elk herd is defined as the population objective plus or minus a range of 10% (Table 1).
Population objectives are determined by agency staff using a combination of factors that include:

- current population estimates
- harvest history
- current harvest levels
- currently occupied summer and winter range
- current condition of available forage
- nutritional status of elk, if known
- current land use practices
- number and location of elk damage complaints
- landowner tolerance
- hunter satisfaction
- disease considerations

Consistent with the primary goal, the secondary goal is to provide recreational opportunity and sustainable annual harvests that fluctuate somewhat due to weather conditions, hunter participation, the number and density of available legal animals, the number of special permits issued for a particular GMU, etc. Hunting seasons are designed to limit extreme fluctuations in sustainable harvests from year to year, although some aspects are out of the control of the Department.

The Washington Fish and Wildlife Commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens, including juvenile, disabled, and senior citizens (RCW 77.04.012).

The secondary goal can be met as long as it does not impinge on the population objectives for total population numbers and population composition and a viable, productive elk population defined as the primary goal. Population composition is typically measured as a ratio of bulls per 100 cows and calves per 100 cows. In some elk populations, these surveys are conducted before the hunt and then post-hunt ratios are projected using harvest information. In some populations, both pre-hunt and post-hunt information is gathered. In a limited number of GMUs, a large enough number of elk are radio-marked to allow biologists to estimate annual mortality rates for different age classes and sex classes (Table 2). There are no elk herds in Washington where all of the parameters listed in Table 2 are collected. Different information is collected for different elk herds that live in different habitats and under differing circumstances. Two or more of the parameters in Table 2 are collected for most elk sub-populations that are monitored. Antler points are used as an index of age-class (e.g., yearling, sub-adult, adult) because it is a characteristic that is readily visible when conducting aerial surveys.

The parameters collected in Table 2 function as guidelines biologists use to make management decisions. The challenge presented to managers is to interpret parameter values that are not in complete agreement across guidelines. Pre-hunt bull:cow ratios may be high for a particular population but post-hunt bull:cow ratios could be very low. Post-hunt bull:cow ratios may be acceptable, whereas bull mortality rates may be higher than desired. These parameters are typically averaged over a 3-year period before changes are implemented, except for extreme cases when immediate action is required. These guidelines are not rigid prescriptions. Often, extenuating circumstances will dictate whether management changes will be made and what
direction those changes might take. Un-hunted elk populations have shown bull-to-cow ratios ranging from 30 to 45+ bulls per 100 cows (Biederbeck et al. 2001, Houston 1982, Flook 1970).

**Background**

An effective strategic plan for managing wild animals allows a certain degree of flexibility for field staff to determine if changes are warranted. Biologists must consider all of the parameters available for a particular elk population and use their professional judgment when making management decisions.

Due to priorities, funding, and weather, comprehensive aerial surveys are not conducted for every elk herd each year. The four herds that are routinely surveyed in a comprehensive fashion are the North Cascades, Yakima, Colockum, and Blue Mountains.

New protocols were developed for the Mount St. Helens herd and WDFW is now able to annually survey 5 core GMUs for the population as long as funding remains available. Using similar techniques, WDFW has started surveying 2 to 3 priority GMUs for the Willapa Hills herd annually. This approach will result in each priority GMU being surveyed every third year.

Herd-wide estimates or indices for the North Rainier, South Rainier, and Olympic herds have not been practical for a number of years. Portions of the Olympic herd are monitored closely through collaborative efforts between Olympic National Park, tribal wildlife programs and WDFW. A comprehensive survey of elk on the entire Olympic Peninsula is not practical at this time.

**Table 1. Population estimates and population objectives with (+/- 10 %) acceptable range for 10 elk herds in Washington.**

<table>
<thead>
<tr>
<th>ELK HERD</th>
<th>MOST RECENT POPULATION ESTIMATE</th>
<th>POPULATION RANGE OBJECTIVE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yakima</td>
<td>11,308</td>
<td>8,550-10,450</td>
</tr>
<tr>
<td>Olympic</td>
<td>Not Available</td>
<td>10,215-12,485</td>
</tr>
<tr>
<td>Colockum</td>
<td>6,018</td>
<td>4,050-4,950</td>
</tr>
<tr>
<td>North Rainier</td>
<td>Not Available</td>
<td>2,520-3,080</td>
</tr>
<tr>
<td>South Rainier</td>
<td>Not Available</td>
<td>2,700-3,300</td>
</tr>
<tr>
<td>North Cascades</td>
<td>~1,200</td>
<td>1,755-2,145</td>
</tr>
<tr>
<td>Selkirk</td>
<td>Not Available</td>
<td>2,160-2,640</td>
</tr>
<tr>
<td>Willapa Hills</td>
<td>2 to 3 core GMUs surveyed annually</td>
<td>7,200-8,800</td>
</tr>
<tr>
<td>Mount St. Helens</td>
<td>5 core GMUs surveyed annually</td>
<td>9,000-11,000</td>
</tr>
<tr>
<td>Blue Mountains</td>
<td>5,200</td>
<td>4,824-5,896</td>
</tr>
</tbody>
</table>
Table 2. Parameter guidelines that affect decisions pertaining to hunting season structure and which class of animals would be impacted by a change in season structure.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Class of Elk Targeted by Season Change</th>
<th>Consider Liberalizing Season</th>
<th>Acceptable Range</th>
<th>Consider Restricting Season</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-hunt Bull:Cow Ratio</td>
<td>Antlered &amp; Antlerless</td>
<td>Greater than 35 bulls:100 cows</td>
<td>15 to 35 bulls:100 cows</td>
<td>Less than 15 bulls:100 cows</td>
</tr>
<tr>
<td>Post-hunt Bull:Cow Ratio</td>
<td>Antlered &amp; Antlerless</td>
<td>Greater than 20 bulls:100 cows</td>
<td>12 to 20 bulls:100 cows</td>
<td>Less than 12 bulls:100 cows</td>
</tr>
<tr>
<td>Estimated Bull Mortality</td>
<td>Antlered</td>
<td>Less than 40 %</td>
<td>Less than or equal to 50 %</td>
<td>Greater than 50 %</td>
</tr>
<tr>
<td>Percent 6-Point or Better Branch-Antlered Bulls In the Post-hunt Bull Sub-Population</td>
<td>Antlered</td>
<td>Greater than 10 %</td>
<td>2 to 10 %</td>
<td>Less than 2 %</td>
</tr>
<tr>
<td>Population Objective</td>
<td>Antlerless</td>
<td>Above Objective</td>
<td>At Objective</td>
<td>Below Objective</td>
</tr>
</tbody>
</table>

**Objective 31:**

Continue to monitor elk populations annually to determine whether they are consistent with Tables 1 and 2. Exceptions will sometimes be made when WDFW is dealing with chronic wildlife conflict issues involving elk.

**Strategies:**

a. Conduct aerial surveys to estimate populations, estimate indices, or to estimate composition ratios of bulls, cows, and calves when funding is available.

b. Manage for cow elk sub-populations that are consistent with the increase or decrease that will allow the population objective to be met for that elk herd (Table 2).


e. When bull mortality is measured for a population, assess whether estimated bull mortality rate is less than or equal to 50% averaged over three years.

f. Manage for a post-hunt 6-point bull or better percentage of 2% to 10% of the bull sub-population (Table 2).

**Recreation Management**

**Background**

In 2012, over 94,000 Washington elk licenses were sold and over 60,000 elk hunters took to the field. Hunters in Washington harvested an average of 7,800 (range 6,826 to 9,162 for 2001-2013)
elk annually from an estimated population of approximately 60,000 (Figs. 1 and 2). Washington has more elk hunters per elk than any other western state and has no limit on the number of elk licenses sold. Any qualified hunter can purchase a license and hunt elk in a general season, and as a result success rates for general season hunters are low. Without carefully managed season timing, antler point restrictions, and relatively short seasons, the male sub-population would be over-harvested. Opportunities to hunt and spend time afield must be balanced against achieving or maintaining elk population objectives. As herd population levels increase, harvest levels will increase as well.

**Objective 32:**

Maintain a sustainable annual elk harvest (range 7,500 to 9,000) that is consistent with the population objectives in Tables 1 and 2.

**Strategies:**

a. Maximize season length where possible while maintaining or approaching elk population objectives.

b. In those eastern Washington GMUs that currently have spike-only hunting seasons, retain spike-only seasons and adjust branch antlered bull permit levels to achieve bull:cow ratio objectives. Retain “any bull” seasons in northeastern Washington as long as population objectives are being met or have a reasonable likelihood of being met.

c. Retain 3-point restrictions in western Washington as long as population objectives are being met or have a reasonable likelihood of being met over time.

d. Design and implement harvest strategies based on the best available information collected for specific elk populations and sub-populations.

e. Unless extreme circumstances warrant, allow at least three years to determine effectiveness of regulation changes designed to achieve management objectives.

![Figure 1. Total elk harvest for Washington, 2001 to 2013.](image)
Background
Annual harvest data generally reflect elk abundance and are useful for monitoring impacts of changing hunting season regulations.

Objective 33:
Continually improve elk harvest data collection.

Strategies:

a. Continue to implement and improve the mandatory harvest reporting system.

Habitat Management

Background
Elk habitat in Washington State is declining due to human population expansion, changes in timber management practices on public land, successional age of habitat, and competition with domestic livestock. The biggest threat to the sustainability of elk populations is loss of quality habitat. To effectively manage elk in Washington, certain priority lands must be conserved with the maintenance or improvement of elk habitat identified as the primary goal on those lands.

Objective 34:
Maintain and enhance 2,000 acres and acquire 2,000 acres of habitat for Rocky Mountain and/or Roosevelt elk during the life of this plan.

Strategies:

a. Identify and prioritize important elk habitat that is at risk of being lost to other land use practices. Identify highest priority elk ranges to target for acquisition or conservation easements.
b. Where habitat condition or quantity limits herd productivity, identify and implement large-scale habitat conservation and enhancement projects.

c. Improve habitat condition where possible, by implementing habitat enhancements and coordinating with land management agencies and private landowners to improve elk habitat quality where those opportunities exist.

d. Purchase, lease, acquire easements, and use other incentives to protect and enhance other key areas identified in elk herd plans.

**Winter Feeding**

**Background**

It is the intent of the Washington Department of Fish and Wildlife that wildlife should exist under natural conditions supported by suitable habitat. Although artificial feeding may assist in wildlife winter survival, it should not generally be considered a substitute for lost habitat and feeding shall be done only in limited situations as prescribed by Department Policy 5302 (Appendix A).

Despite this intent, the Department maintains some historic supplemental feeding operations for wildlife. Supplemental Feeding is defined by the Department as regular winter feeding operations to provide feed to wildlife where adequate winter habitat is not available and feeding is necessary to support the population level as identified in a management plan, or for specific control of deer or elk damage. The best example is the Yakima elk herd where winter habitat has been eliminated. Some historic winter habitat is currently growing high value agricultural crops. These crops are at risk of damage by elk unless supplemental feeding is provided each winter. A large percentage of what is considered historic elk winter range before European settlement has been lost or altered due to agriculture and housing development. To prevent elk in the Yakima herd from causing agricultural damage, elk fencing was constructed and a winter feeding program was established decades ago. Elk winter-feeding programs can be problematic. They are expensive and cause elk to congregate at high densities, where they have a higher potential for spreading diseases and/or parasites. Elk that are fed in the winter can also have extreme impacts on shrubs, trees, and riparian zones near feeding sites.

The Department also recognizes that extreme winter conditions sometimes necessitate implementation of emergency feeding operations (Appendix A). Both supplemental feeding and emergency feeding of wildlife introduces an artificial food source and concentrates animals, which can make them more susceptible to predation, poaching, and disease.

Winter-feeding will not occur in areas where species can be hunted for recreation while feeding activities are underway. The Department will periodically evaluate the need to continue winter feeding operations.

**Objective 35:**

Conduct an evaluation of the current elk-feeding program. Reduce the dependency on supplemental feeding if possible.

**Strategies:**

a. Using the data generated from the Yakima elk herd study and other data, determine if the Yakima elk herd population objective needs to be adjusted.
When needed implement winter feeding programs consistent with Department Policy 5302 (see Appendix A).

**Disease**

**Background**

Wild elk suffer from a wide variety of diseases. Some diseases are commonplace and have very little impact at the population level. Other diseases can be far more serious, have major impacts at the population level, and have severe economic consequences.

**Objective 36:**

Opportunistically monitor the health of wild elk in Washington when they are captured for other reasons and samples can be readily obtained. Take blood and tissue samples when elk are captured and/or from harvested elk and test for diseases common to elk. When necessary capture or collect elk to address specific disease issues.

**Strategies:**

a. Continue to monitor for pathogenic conditions in elk and try to determine their causes.
b. Continue to monitor elk hoof disease and determine its cause.
c. Continue to gather on-line reports from the public regarding hoof disease distribution.
d. Develop a protocol using the citizen science program to assess prevalence of hoof disease.
e. Develop a multi-point outreach program to better inform the public about hoof disease and the actions WDFW and cooperators are taking with regard to hoof disease.
f. Follow U. S. Department of Agriculture and Washington Department of Agriculture guidelines for reporting diseases that are detected and implement the disease-specific actions consistent with those guidelines.

**Predation**

**Background**

Black bears, cougars, coyotes, and wolves all prey on elk calves and/or adult elk. Predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3.

If the WDFW determines that wolf predation is a primary limiting factor for an “at-risk” ungulate population, and the wolf population in that wolf recovery region has at least 4 successful breeding pairs, the WDFW can consider reducing wolf abundance in localized areas occupied by the ungulate population before state delisting of wolves occurs.

At-risk ungulate populations are any that are federal or state listed as threatened or endangered (e.g., Selkirk Mountain woodland caribou, Columbian white-tailed deer). An at-risk population would also include any ungulate population which falls 25% below its population objective for two consecutive years or if the harvest decreases by 25% below the 10-year average harvest for two consecutive years.
Objective 37:
Identify herds or local populations that are below population objectives where predation effects might be a limiting factor by 2015.

Strategies:

a. Develop a prioritized list of herds where predators might be limiting factors.
b. Identify the biological parameters that implicate predators as the factor.
c. Harvest history, etc.
d. Invoke the predator-prey guidelines.

For ungulate populations lacking numeric estimates and/or without management objectives, the WDFW will rely on other information to assess a decline, such as harvest trends, hunter effort trends, sex and age ratios of the population, and others (WDFW 2011).

Research

Background
The Yakima elk herd is one of the largest in the state, and herd characteristics have responded well to management strategies designed to increase bull:cow ratios and the survival of adult bulls. Much of the historical winter range for ungulates is now under agricultural and rural development. Much of the potential winter range is used for high-value agriculture. Fences and artificial feeding are used to control elk distribution and movements on the very limited winter range. The U.S. Forest Service (USFS) has questioned whether the size of the current elk population can be maintained without damage to sensitive habitats, such as wet and dry meadows, on spring-summer-fall range. Better information is needed on the relationship between the size of the Yakima elk herd and the habitat supporting that herd.

Objective 38:
Complete the research project pertaining to the Yakima elk herd taking into account the number of environmental, social, recreational, and economic values assigned to this herd by various user-groups.

Strategies:

a. Complete the data analysis and report writing needed to accomplish this objective.

Background
The Colockum elk herd has long been characterized by low bull:cow ratio estimates. In 1994, spike-only hunting was adopted for general license holders. This regulatory change had been implemented throughout much of eastern Washington and was designed to increase bull survival, increase the ratios of adult bulls to cows, and to promote early, synchronized breeding. In the Blue Mountains and Yakima elk herds the effects on bull:cow ratios were rapid and dramatic. These responses were not similarly observed in the Colockum herd, and bull survival is unknown. Bull:cow ratio estimates have generally remained below objective. Branch-antlered bull hunting has, therefore, been strongly limited. An alternative explanation to chronically low estimates of bull:cow ratios deriving mostly from low bull survival is that the distribution of wintering bulls renders them poorly detectable under the traditional winter survey design for population monitoring employed for the Colockum herd. In the fall of 2013, a study was implemented to
document seasonal movements/distribution of bull elk in this herd and also to estimate annual survival rates.

Objective 39:
Complete the bull elk movement/survival study in the Colockum elk herd.

Strategies:
a. Estimate adult bull elk survival and document seasonal movements and distribution for the Colockum elk herd.
b. Make appropriate changes to bull elk management and annual survey design supported by the study findings.

Background
Since 2008, a substantial increase in prevalence and distribution of hoof disease has occurred in southwest Washington. It is unclear at this time how hoof disease is affecting population dynamics of the Mount St. Helens and the Willapa Hills elk herds.

Objective 40:
Gain a better understanding of the population demography effects of hoof disease on elk.

Strategies:
a. Develop a study proposal that explores the population dynamics of elk afflicted with hoof disease.
b. Radio-mark elk in populations afflicted with hoof disease.
c. Conduct survival and recruitment analysis on elk afflicted with hoof disease.

VII. LITERATURE CITED


DEER (*Odocoileus virginianus, O. hemionus hemionus, O. h. columbianus*)

I. POPULATION STATUS AND TREND

Black-tailed deer (*Odocoileus hemionus columbianus*), mule deer (*O. h. hemionus*), and white-tailed deer (*O. virginianus*) are all native to the state of Washington. The total deer population in the state numbers approximately 300,000 to 320,000. White-tailed deer populations at this writing appear to be stable or increasing after reductions in the northeast from back-to-back severe winters combined with liberal antlerless hunting opportunity. Mule deer populations in north-central and eastern Washington are stable to increasing at the time of this writing, with the exception of the south-central where mule deer numbers are slowly starting to increase after having declined, likely as a result of hair loss caused by exotic lice. Black-tailed deer populations seem to be stable across their range with localized population fluctuations. Where black-tailed deer populations are struggling, hair loss disease is likely one of the contributing factors. The goal set by the Washington Department of Fish and Wildlife (WDFW) for the management of black-tailed deer, mule deer, and white-tailed deer populations in Washington is to maintain numbers within habitat limitations. Landowner tolerance, a sustainable harvest, and non-consumptive deer opportunities are considered within the land base framework.

II. RECREATIONAL OPPORTUNITY

Deer are hunted in Washington from September through December with special permit opportunities extending into March. State regulations provide for archery, muzzleloader, and modern rifle seasons. In recent years Washington’s deer harvest has been evenly distributed with black-tailed deer, mule deer, and white-tailed deer each making up one third of the harvest (Figures 1 and 2).

![Total Deer Harvest](image)

*Figure 1. Estimated Washington deer harvest for 2001-2013.*
White-tailed deer populations in northeastern Washington were affected by back-to-back severe winters of 2007-08 and 2008-09. In addition, the production of alfalfa and small cereal grains (oats, wheat, barley) declined from the middle 1980s to the mid-2000s by about 45%. From 1997 through 2009, youth, senior, and disabled hunters were allowed to take antlerless white-tailed deer during general buck seasons in northeast Washington. Starting in 2010, the need for more restrictive seasons was recognized. More restrictive actions included shortening season length for general season antlerless opportunity and eliminating most antlerless special permit opportunities. The Fish and Wildlife Commission also imposed a four-point antler restriction in GMUs 117 and 121. Early indications in harvest data suggest the white-tailed deer populations may be increasing slightly in northeast Washington.

Eastern Washington mule deer seasons have been much more restrictive since 1997. Some of the restrictive measures include a three-point minimum restriction for all mule deer in eastern Washington and a shortened deer hunting season for most hunters. As a result of the more restrictive general season opportunities for mule deer, a very successful late season special permit opportunity is now being offered in most areas where mule deer are a priority big game species. Antlerless mule deer hunting opportunities are offered mostly by special permit only.

Throughout western Washington, total black-tailed deer harvest has remained relatively stable in recent years in terms of total numbers harvested. Black-tailed deer provided 32.3% of the total 2013 deer harvest. Changes in land use practices have had a major influence on black-tailed deer populations (Nelson et al. 2008).
III. DATA COLLECTION

WDFW conducts composition surveys from the air and on the ground to index buck, doe, and fawn ratios. Depending on the species/subspecies, location and terrain involved, deer composition surveys are conducted in the spring, summer, early fall (pre-hunt), and early winter (post-hunt) before deer shed their antlers. Population estimates are also derived for some mule deer subpopulations using a visibility bias model developed in Idaho for elk (Samuel et al. 1987, Ackerman 1988). Variants of the model have been developed for a variety of other species including mule deer (Ackerman 1988). All survey work is constrained by budget, staffing, and weather.

Pre-hunt and post-hunt surveys are generally conducted in eastern Washington for both white-tailed deer and mule deer. Deer populations in selected areas are frequently surveyed again in March and April to assess winter survival and recruitment.

White-tailed deer are surveyed in summer to determine pre-hunting season fawn and buck ratios and infrequently again in spring to determine recruitment – those fawns that have survived their first 10 or 11 months and will likely reach their first birthday alive. Hunter check stations are used to sample hunter success, deer condition, and age distribution of whitetail bucks in the harvest.

IV. DEER MANAGEMENT GOALS

The statewide management goals for deer are:

1. Preserve, protect, perpetuate, and manage deer and their habitat to ensure sustainable populations.
2. Manage deer for a variety of recreational, educational, and aesthetic purposes including hunting, scientific study, cultural, subsistence, and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Manage statewide deer populations for a sustainable annual harvest.

V. BACKGROUND, OBJECTIVES, AND STRATEGIES

Population Management

The goal of deer population management is to maintain relatively stable populations within the limitations of available habitat, landowner tolerance, accounting for extreme weather events (i.e., summer and fall drought, catastrophic fire, protracted winters with deep snow). Recreation management for deer is directly tied to population management. The recreation goal for deer is to maintain or increase hunting opportunity. An additional goal is to be responsive to landowner conflicts which sometimes involves recreational hunting seasons but other times requires separate mitigation tools as spelled out in the wildlife conflict section.

Aside from raw counts, some of the most straightforward metrics used to characterize deer herds are by composition ratios, such as buck:doe ratios. Post-hunt buck:doe ratios generally reflect how heavily the antlered class of the population is being hunted. The Department has designated three levels of hunting pressure and assigned a range of post-hunt buck ratio targets for each (Table 2). Recruitment rates and mortality rates vary substantially depending upon species/subspecies, weather, and location.
Table 2. Hunting intensity and related buck:doe ratios.

<table>
<thead>
<tr>
<th>Level of Hunting Pressure</th>
<th>Post-hunt Buck Ratios</th>
</tr>
</thead>
<tbody>
<tr>
<td>Liberal</td>
<td>15 to 19 bucks:100 does</td>
</tr>
<tr>
<td>Moderate</td>
<td>20 to 24 bucks:100 does</td>
</tr>
<tr>
<td>Conservative</td>
<td>25+ bucks:100 does</td>
</tr>
</tbody>
</table>

BLACK-TAILED DEER

Background

Of the three types of deer hunted in Washington, black-tailed deer have historically provided the highest number of deer harvested. In recent years, black-tailed deer harvest has been closer to both white-tailed deer and mule deer harvest estimates. Black-tailed deer are difficult to survey due to the habitat they occupy, making it difficult to quantify population trends. Age ratios or sex ratios by themselves are inadequate for detecting population growth or decline (Caughley 1977, 1974). Nonetheless, it is helpful to the process of setting deer harvest objectives, hunting intensity, and regulations to have some estimate or index of the abundance of animals in the population available for harvest (Table 3). Black-tailed deer habitat has been reduced in western Washington due to human encroachment, a reduction in timber harvest, and the natural progression of aging timber stands (succession). Annual harvest estimates indicate that black-tailed deer numbers are fairly static; however, the number of days per harvested animal would suggest that black-tailed deer might have declined somewhat over the past two decades. The suggested decline in black-tailed deer, particularly in coastal regions of the Olympic Peninsula, has been related to low winter survival of fawns afflicted with hair loss disease (McCoy, et al. 2014). Range-wide there are probably additional factors, as listed above, affecting localized population declines or increases. To complicate matters further, hunting regulations have varied substantially over the years making it difficult to compare harvest estimates across years. Because of their habitat and the difficulties involved with surveying them, there are still many unknowns about black-tailed deer population dynamics.

Objective 41:

Determine how well existing survey protocols for black-tailed deer are working by 2021.

Objective 42:

Establish and implement consistent survey protocols for black-tailed deer by 2021.

Strategies for Objectives 41 & 42:

a. Conduct a literature search and peer review for existing population estimate and population index techniques that would be appropriate for black-tailed deer.
b. Document, develop, and standardize survey protocols or population models for black-tailed deer.
c. Incorporate the Department’s black-tailed deer research results in the process of revising and expanding black-tailed deer population assessments.
d. Summarize results from black-tailed deer habitat use research and use this knowledge to recommend deer habitat enhancements to land managers.
Table 3. Hunting intensity for black-tailed deer implemented within Regions.

<table>
<thead>
<tr>
<th>Region</th>
<th>Liberal</th>
<th>Moderate</th>
<th>Conservative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Region 4</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Region 5</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Region 6</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

MULE DEER

Background
Mule deer population levels are closely tied to severe winter events and severe drought, and they are susceptible to over-harvest. The variety of hunting seasons offered for mule deer attempts to address this susceptibility while still offering general season hunting opportunity (Table 4). Mule deer populations are more amenable to population surveys than black-tailed deer or white-tailed deer in Washington. Currently, not all mule deer populations in all parts of the state are being surveyed (Mayer et al. 2002). Depending on the district, mule deer may be surveyed after the hunting season, before the hunting season, or during the spring green-up. Some mule deer populations may be surveyed more than one time during the year.

Table 4. Hunting intensity for mule deer implemented within Regions.

<table>
<thead>
<tr>
<th>Region</th>
<th>Liberal</th>
<th>Moderate</th>
<th>Conservative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Region 1</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Region 2</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Region 3</td>
<td>X</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Region 5</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Objective 43:**
Continue to implement, refine, and expand survey protocols for mule deer.

**Strategies:**

a. Conduct post-hunt population surveys to estimate population size, or a population index, and a buck survival index.
b. Conduct population surveys each year for major herds and expand the areas surveyed as resources are available.
c. When appropriate, put survey areas on a two or three year cycle to provide adequate coverage and maintain cost-effectiveness.
d. Conduct spring “green-up” surveys to quantify winter survival of adults and juveniles, and use this information to set special permit quotas and antlerless seasons for the next calendar year’s hunting season.
e. Conduct pre-hunt surveys in summer and early fall to estimate productivity and to index the ratio of bucks per does and the ratio of legal bucks per does.

Background
Mule deer populations are influenced by site specific habitat quality, habitat quantity, land-use practices, severe winter events, drought, and predation. Recent mule deer research conducted by WDFW and cooperators has provided new information regarding how mule deer populations function in relation to their habitat.
**Objective 44:**

Use the information provided by the Cooperative Mule Deer Research study to inform mule deer management at an ecoregional scale.

**Strategies**


b. Delineate ecoregional zones where mule deer habitat is similar.

c. Explore the efficacy of designing surveys that discern population trends at the ecoregional scale.

**WHITE-TAILED DEER**

**Background**

White-tailed deer population levels are closely tied to severe winter events and land-use practices. White-tailed deer have the highest potential maximum rate of increase of all North American ungulates due to the type of habitat they occupy, their age at first reproduction when on a high nutritional plane, and their ability to successfully recruit twins into the population (McCullough 1987); however, in some of the western states where hard mast is not a component of forage, that full potential may not be realized. Age ratios or sex ratios by themselves are inadequate to detect population growth or decline (Caughley 1977). The majority of white-tailed deer populations in Washington are harvested under a fairly liberal hunting season structure despite some recent restrictions implemented since 2010 (Table 5).

<table>
<thead>
<tr>
<th>Region</th>
<th>Liberal</th>
<th>Moderate</th>
<th>Conservative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Region 1</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Region 2</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Region 3</td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

**Objective 45:**

Document buck-doe ratios for a sample subset of GMUs where at least 50 bucks are harvested each year.

**Strategies:**

a. Conduct post-hunt population surveys to index population size.

b. Conduct post-hunt population surveys to index buck survival.

c. Conduct spring “green-up” surveys to quantify winter survival of adults and juveniles, and use this information to set special permit quotas and antlerless seasons for the next calendar year’s hunting season.

d. Conduct pre-hunt surveys in summer and early fall to estimate productivity and to index the ratio of bucks per 100 does and the ratio of legal bucks per 100 does.

**Background**

Like black-tailed deer, white-tailed deer populations are difficult to estimate in many areas of Washington (Roseberry and Woolf 1991, Lancia et al. 1996, Lancia et al. 2000, Mayer et al. 2002).
Age ratios or sex ratios by themselves are inadequate for detecting population growth or decline (Caughley 1977, 1974).

**Objective 46:**
Improve and expand the existing survey protocols for white-tailed deer.

**Strategies:**

a. Conduct literature review and consult with biometricians to evaluate the latest developments in population estimation.
b. Develop and standardize best-case survey protocols for white-tailed deer throughout the state.

**Predation**

**Background**
Black bears, cougars, coyotes, bobcats, and wolves all prey on deer fawns and/or adult deer. Predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3.

If the WDFW determines that wolf predation is a primary limiting factor for an “at-risk” ungulate population, and the wolf population in that wolf recovery region has at least 4 successful breeding pairs, the WDFW can consider reducing wolf abundance in localized areas occupied by the ungulate population before state delisting of wolves occurs.

At-risk ungulate populations are any that are federal or state listed as threatened or endangered (e.g., Selkirk Mountain woodland caribou, Columbian white-tailed deer). An at-risk population would also include any ungulate population which falls 25% below its population objective for two consecutive years or if the harvest decreases by 25% below the 10-year average harvest for two consecutive years.

For ungulate populations lacking numeric estimates and/or without management objectives, the WDFW will rely on other information to assess a decline, such as harvest trends, hunter effort trends, sex and age ratios of the population, and others (WDFW 2011).

**Objective 47:**
Identify herds or local populations that are below population objectives where predation effects might be a limiting factor by 2015.

**Strategies:**

a. Develop a prioritized list of herds where predators might be limiting factors.
b. Identify the biological parameters that implicate predators as the factor.
c. Harvest history, etc.
d. Invoke the predator-prey guidelines.
Research

MULE DEER

Background
Mule deer populations have cycled in abundance during the last century across much of their North American range. In the 1990s, mule deer declined across most of the western United States. The public, the press, and wildlife scientists have postulated a variety of theories to explain this decline. Major contributors to the decline in mule deer numbers in Washington were deterioration of mule deer habitat due to successional progression of habitat from early to late successional stages, changes in land use, as well as high winter mortality due to the severe winters of 1992-1993 and 1996-1997. Because of this decline, the Department invested in a multi-cooperator, long-term mule deer research project.

Objective 48:
Use the information from the completed Mule Deer Cooperative Study, such as the relationship between habitat, predation, body condition, and other factors as they relate to Washington mule deer survival and recruitment to inform mule deer management.

Strategies:

a. Provide information summaries and technical reports to the public.
b. Implement recommendations as appropriate.

BLACK-TAILED DEER

Background
The mortality rates for black-tailed deer in hunted populations have been studied. The Department initiated studies on buck mortality in both Region 4 and Region 6 from 1999 through 2001. Annual survival for males was approximately 0.5 for both study sites despite differing hunting season structures (Bender et al. 2004).

Further work on population dynamics, habitat needs, the relationship between habitat and deer survival and productivity, and better techniques to estimate or index populations will help the Department better manage black-tailed deer.

Objective 49:
Continue and complete the current black-tailed deer research to develop a better understanding of population dynamics, survival, habitat needs, and population estimation techniques for black-tailed deer.

Strategies:

a. Support the current black-tailed deer research project for which field work is scheduled to be completed by 2017 and data analysis and report writing is scheduled to be completed by 2018.
b. When completed in 2017, disseminate the final report, dissertation, and any peer reviewed publications that result from the Washington State University tame deer nutritional study.
c. Incorporate the results of the black-tailed deer research project in future management activities.
WHITE-TAILED DEER

Background
Little is known about survival, population dynamics, and movements of white-tailed deer in Washington State.

Objective 50:
Continue and expand the current white-tailed deer research.

Strategies:

a. Conduct basic survival and movement research on white-tailed deer in eastern Washington.

b. Collaborate with university researchers to develop resource selection functions for white-tailed deer.

Disease

ALL DEER

Background
Wild deer suffer from a number of diseases. Some can have severe but localized impacts on a sub-population.

Objective 51:
Monitor deer for disease each year and implement means to reduce the risk of disease when possible.

Strategies:

a. Monitor for chronic wasting disease (CWD) using targeted surveillance.

b. Enforce the current regulations that prevent the captive farming of native deer and elk in Washington.

c. Continue to monitor for epizootic hemorrhagic disease (EHD), adenovirus hemorrhagic disease (AHD), hair loss syndrome, and tuberculosis (TB).

d. Monitor for other diseases and maintain coordination with other state’s wildlife veterinarians as necessary.

VI. LITERATURE CITED


I. POPULATION STATUS AND TREND

Washington State has approximately 1,380 bighorn sheep distributed in 17 identified herds, exclusive of those managed by tribal governments. Of these, we categorize sheep in 11 herds as ‘California bighorns’ and 6 as ‘Rocky Mountain bighorns’, although the biological importance of these designations are subject to dispute (Wehausen and Ramey 2000). As of early 2014, herds vary from as few as 35 to as many as 250 sheep. Populations are considered to be approximately stable in 9 herds, increasing in 4 herds and declining in 4 herds. Although predators may be locally important limiting factors during some years and for some herds, the overwhelming management concern for bighorns in Washington during 2015-2021 will continue to be mortality and poor lamb recruitment caused by pneumonia.

The 5 herds considered to be part of the Hells Canyon meta-population (including herds in Oregon and Idaho) have all declined since the 1990s due to pneumonia and continue to suffer poor lamb recruitment. In 2009, the Umtanum/Selah Butte herd between Ellensburg and Yakima suffered a pneumonia outbreak. Although the herd subsequently rebounded, it is still considered infected and susceptible to future declines and poor recruitment. In 2013, a severe outbreak caused considerable mortality in the Tieton herd, near Naches. Concern about the potential spread of disease to the adjacent Cleman Mountain herd prompted WDFW to remove this herd entirely. Declines that do not appear to be related directly to pneumonia (but may also be related to other diseases) have recently been documented in the Sinlahekin and Vulcan Mountain herds. Herds unaffected by diseases and that have sufficient habitat, have thrived, and provided both consumptive and non-consumptive recreational opportunity. Unlike in the Rocky Mountain states, most bighorn herds in Washington live at relatively low elevations, often near public highways (e.g., Cleman Mountain, Swakane, Umtanum/Selah), and thus provide excellent opportunities for the general public to view these animals in their natural habitat.

II. RECREATIONAL OPPORTUNITY

Populations of ‘Rocky Mountain’ bighorns in south-eastern Washington are still affected by pneumonia, and thus are much smaller than their habitat could support. Most populations of ‘California’ bighorns, typically along the eastern foothills of the Cascades, are limited by available public lands. In Washington, most hunting is of mature rams. Therefore, harvest thresholds are based on total population size, sex structure, and the number of mature rams in a herd. Hunting opportunity for rams is allocated by permit drawing and is a once-in-a-lifetime opportunity (except for raffle and auction permit holders, and ewe hunts).
number of permit hunt applications received annually varies, depending on the popularity of the hunt and number of permits available. Statewide, permit levels have varied from as few as 9 to as many as 37 hunts in recent years, depending on herd status. Hunter success is high (97%).

III. DATA COLLECTION

The Department has generally surveyed each herd annually, using either aerial or ground surveys. Surveys typically are conducted during winter when animals are concentrated, and data are used to estimate population size, lamb recruitment, sex ratio, and percentage of mature rams in the population. In addition to surveys, individuals from selected herds are screened for disease and parasites during winter captures or feeding operations.

IV. BIGHORN SHEEP MANAGEMENT GOALS

The statewide goals for bighorn sheep are:

1. Preserve, protect, perpetuate, and manage bighorn sheep and their habitats to ensure healthy, productive populations.
2. Manage bighorn sheep for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Manage statewide bighorn sheep populations for a sustained yield.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Habitat Management

Habitat quality influences bighorn sheep reproduction, survival, and abundance. Unfortunately, habitat conditions are deteriorating in some bighorn herds, primarily due to the spread of noxious weeds, human development, and fire exclusion. Improving habitat quality for bighorn sheep where possible is likely to improve reproduction and growth, particularly among young animals. Many bighorn sheep populations in Washington include or are adjacent to private lands. Although bighorns can be compatible with some commercial activities (e.g., timber harvesting, cattle grazing), they are susceptible to habitat loss or disease from others (e.g., housing development, domestic sheep or goat grazing).

Objective 52:

Identify locations within existing bighorn sheep ranges where prescribed burns or noxious weed eradication can be accomplished in a cost-efficient manner.

Strategies:

a. Coordinate with WDFW Wildlife Area Managers where bighorn herds currently exist, in cooperation with district biologists to identify priority projects and budget needs by 2015.
b. Accomplish at least one prescribed burn in a priority area by 2016.
c. Work with federal (e.g., USFS, BLM) and other state land management agencies (e.g., DNR) to elevate the importance in their planning of fire management policies beneficial to bighorn sheep.
Objective 53:
Identify locations within and adjacent to existing bighorn sheep ranges where habitat acquisition of private land (either through fee title or conservation easement) is a high priority.

Strategies:

a. Pursue conservation easements or fee title purchases for properties identified as high priorities when opportunity arises.

Population Management

Issue Statement
Bighorn sheep in Washington naturally occurred in patchy populations that, on a long-term scale, were susceptible to occasional extirpation and re-colonization. In the 21st century, these naturally occurring dynamics are no longer possible because most land use separating existing bighorn populations is incompatible with bighorn management. Thus, relocation has been used as a tool to establish new populations, augment existing populations, and artificially establish genetic connectivity. This, in turn, increases the long-term viability of bighorn sheep by increasing total population size, increasing the number of populations, and providing linkages between populations for the exchange of individuals and genetic material (Bailey 1992). Reductions, and in extreme cases, complete losses of bighorn populations due to disease outbreaks have both increased the need for reintroduction and augmentation, as well as the risk inherent in allowing bighorns to move out of existing ranges in natural exploratory movements.

Objective 54:
Re-establish a bighorn herd in the existing Tieton herd habitat patch by 2016, and monitor for reproduction and population trends by 2018.

Strategies:

a. Identify risks to Tieton bighorns posed by presence of domestic sheep and/or goats.
b. Minimize risks through combination of education, fencing, disease treatment, herd buy-outs, and other actions identified through ongoing analyses.
c. Identify potential source animals through disease testing.
d. Secure additional funds from private groups to assist in reintroduction expenses.
e. Move bighorns into existing Tieton range during 2016 and 2017.

Objective 55:
Complete analysis of the feasibility of introducing bighorns into the Pasayten Wilderness by 2019.

Strategies:

a. Produce maps of the biological potential for new bighorn ranges in the Pasayten Wilderness areas using existing summer and winter GIS habitat data by 2018.
b. If above analyses suggest that areas are biologically suitable, investigate USFS interest and capability by 2019.
c. If above analyses suggest either reintroduction is feasible, complete a reintroduction plan by 2020.
**Objective 56:**
Evaluate the status of small, isolated bighorn herds in the northeastern part of the state (Hall Mountain and Vulcan Mountain), as well as the Tucannon herd in the southeastern part of the state, and formulate a long-term strategy for their management.

**Strategies:**

a. Investigate whether ground-based sampling or capture of animals from these herds can be accomplished on a cost-effective basis.

b. Test captured animals in Vulcan Mountain for disease, and equip a sample of animals with GPS collars to examine habitat relations relative to increasing human development.

c. Explore feasibility and desirability of using Hall Mountain animals to supplement the Tucannon herd of Rocky Mountain bighorn sheep, and develop monitoring protocols that will allow us to assess the long-term success of any augmentation actions.

**Objective 57:**
Initiate assessment of the genetic diversity of, and genetic relatedness among Washington’s bighorn sheep herds, and if necessary, develop strategies to minimize any effects of genetic drift or inbreeding and maximize bighorn herds’ abilities to respond adaptively to future environmental stresses (Hogg et al. 2006; Luikart et al. 2008, 2010; Rioux-Paquette et al. 2010, 2011).

**Strategies:**

a. Gather genetic samples from horn shavings obtained when hunter-harvested animals are permanently marked.

b. Contract with internal or external genetics laboratory to conduct comparative analysis of genetic variability, and to recommend priority herds for genetic augmentation.

c. Finalize a long-term plan for occasional genetic augmentation, including priority herds, potential donor sources, number and type of effective migrants needed, and follow-up monitoring.

d. Gather and interpret additional data on the effects of selective harvest on bighorn rams by ageing harvested animals and measuring annual growth increments from trophies during mandatory inspection.

**Issue Statement**
To better manage bighorn sheep populations, managers strive to maintain sustainable and healthy populations of bighorns, while at the same time maintain sheep at levels that minimize the risk of disease and reduce agricultural damage on private lands.

**Objective 58:**
Develop habitat-based population objectives for each bighorn herd, taking into account wildlife conflicts, disease history, and risk of contact with domestic sheep and goats.

**Strategies:**

a. Use existing GIS habitat data and local knowledge to quantify area (in km²) of summer and winter habitat in each bighorn range by 2015.

b. Conduct a thorough literature review, and establish reasonable population density targets.

c. Calculate new population objectives (to update Table 1).
Table 1. Approximate population sizes in early 2014, and previous plan objectives for Washington’s bighorn sheep herds. Objective 58 is to revise the right-hand column, based on habitat mapping and literature-based estimates of desired population densities.

<table>
<thead>
<tr>
<th>Herd</th>
<th>Total Population Size</th>
<th>Approximate Current</th>
<th>Objective b</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hall Mountain a</td>
<td></td>
<td>20-25</td>
<td>40-70</td>
</tr>
<tr>
<td>Vulcan</td>
<td></td>
<td>30-40</td>
<td>80-110</td>
</tr>
<tr>
<td>Lincoln Cliffs</td>
<td></td>
<td>105-125</td>
<td>90-100</td>
</tr>
<tr>
<td>Asotin Creek a</td>
<td></td>
<td>65-70</td>
<td>50-60</td>
</tr>
<tr>
<td>Black Butte a</td>
<td></td>
<td>40-50</td>
<td>300</td>
</tr>
<tr>
<td>Wenaha a</td>
<td></td>
<td>35-50</td>
<td>140</td>
</tr>
<tr>
<td>Mountain View a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tucannon a</td>
<td></td>
<td>20-30</td>
<td>60-70</td>
</tr>
<tr>
<td>Mt. Hull</td>
<td></td>
<td>90-100</td>
<td>55-80</td>
</tr>
<tr>
<td>Sinlahekin</td>
<td></td>
<td>35-45</td>
<td>50</td>
</tr>
<tr>
<td>Manson</td>
<td></td>
<td>105-115</td>
<td>100-150</td>
</tr>
<tr>
<td>Chelan Butte</td>
<td></td>
<td>110-120</td>
<td></td>
</tr>
<tr>
<td>Swakane</td>
<td></td>
<td>130-140</td>
<td>50-60</td>
</tr>
<tr>
<td>Quilomene</td>
<td></td>
<td>150-180</td>
<td>250-300</td>
</tr>
<tr>
<td>Umtanum/Selah Butte</td>
<td></td>
<td>190-210</td>
<td>250-300</td>
</tr>
<tr>
<td>Cleman Mountain</td>
<td></td>
<td>180-210</td>
<td>140-160</td>
</tr>
<tr>
<td>Tieton</td>
<td></td>
<td>0</td>
<td>75-150</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>1,270-1,490</strong></td>
<td><strong>1,750-2,130</strong></td>
</tr>
</tbody>
</table>

a Rocky Mountain bighorn sheep
b From 2009-2015 GMP; to be revised by 2015.

**Objective 59:**

Use population objectives as a guide to harvest management (particularly with regard to ewe harvest opportunity), as well as translocation and augmentation.

**Strategies:**

a. For herds that are exceeding population goals and disease has not been identified as an issue, trap and relocate sheep to an alternate area when budgets allow.

b. For herds that are exceeding the desired population size, and disease has been identified as an issue or budgets constrain trapping opportunities, establish ewe harvest opportunities.

c. For herds that are below the desired population size, consider restricting harvest and augmenting the population.

**Issue Statement**

There is a need to monitor herds annually or bi-annually to provide maximum recreational harvest opportunity consistent with maintaining an adequate number of large-sized, older-aged rams in a population for normal breeding behavior. While providing hunter opportunity, long-term evolutionary potential must not be compromised (Allendorf et al. 2008, Coltman et al. 2003, Harris et al. 2002, Hengeveld et al. 2011, Festa-Bianchet et al. 2014).
Objective 60:
Monitor bighorn sheep herds bi-annually (or annually where justified) with sufficient precision that: i) declines driven either by disease events can be identified rapidly, ii) declines driven by other external factors or by excessive harvest can be identified within a 4-year period, and iii) increases in the population sufficient to justify an increase in harvest opportunity can be identified within a 4-year period.

Strategies:

a. Conduct big horn sheep surveys annually or bi-annually for each herd.
b. Capture and equip a sample of ewes and rams with GPS radio collars to better delineate movements and ranges used where recent data are lacking.
   1. Priority herds for 2016-2021 are Vulcan Mountain, Chelan Butte, Quillomene, and Tucannon.
c. Where identified as a high priority by district biologists, use radio-collars to develop herd-specific sightability models.
d. Continue application of herd-specific sightability models for Blue Mountain herds, as well as other herds where biologically justified (Bodie et al. 1995).

Issue Statement

Like other wildlife, bighorn sheep are subject to periodic disease outbreaks. A respiratory disease that takes a toll on wild bighorns is pneumonia. Unlike in many wildlife situations, however, the bacteria causing pneumonia in bighorns are not native to North America, and thus bighorns have not had evolutionary time to adapt to it. Wildlife health researchers across the west have found that pneumonia in bighorns is most often associated with bacteria named *Mycoplasma ovipneumoniae*, although other bacteria in the family *Pasteurellaceae* typically take advantage of *M. ovipneumoniae* infection and cause death. Domestic sheep and goats carry both *M. ovipneumoniae* and the various species within *Pasteurellaceae*, but are not clinically affected. However, wild bighorn sheep infected by these bacteria often develop acute pneumonia and die; those that survive often transmit bacterial infection to lambs that subsequently succumb to pneumonia (Besser et al. 2008, 2012; Cassirer and Sinclair 2007; Wehausen et al. 2011; Wild Sheep Working Group 2012). Currently, there is no effective treatment or preventive vaccination for pneumonia in wild bighorn sheep. Pneumonia outbreaks have killed bighorn sheep in other western states and in some Washington herds. Most recently, infected big horns were found in late 2009 and early 2010 in the Umtanum herd in the Yakima River Valley, in 2012 in the Asotin herd, and in early 2013 pneumonia decimated the Tieton bighorn herd west of Naches.

Objective 61:
Reduce to the degree feasible the probability of contact between bighorn sheep and domestic sheep and goats in all bighorn herds as well as in areas identified for repatriation of bighorn sheep.

Strategies:

a. On federal and state managed public lands, work with public land agency counterparts to produce the best-scientifically possible analyses of risks of contact between wild bighorns and domestic sheep/goats (O’Brien et al. 2014).
b. On federal and state managed public lands, work with public land agencies to develop management plans that minimize the risk of contact between wild bighorns and domestic sheep/goats.
c. On WDFW managed public lands, prohibit grazing of domestic sheep or goats in areas occupied by bighorn sheep or plans for repatriation.
d. On private lands where potential for contact with bighorns exists and where neither purchase nor conservation easements are possible, work toward minimizing probability of contact with domestic sheep/goats, by:
   1. Educating flock owners about the risks of disease transmission and how to contact Department personnel in a timely manner.
   2. Working with flock owners to provide effective physical barriers.
   3. Working with flock owners to develop disease-free domestic herds.
   4. Where feasible and other approaches have failed and extirpation of local bighorn herd is likely, consider buy-outs of domestic herds.

Recreation Management

Issue Statement

The demand for bighorn sheep hunting opportunity exceeds the allowable harvest for sustainable populations. Therefore, the Department restricts bighorn sheep harvest to a level compatible with long-term sustainability of each herd. With bighorn sheep, hunters typically select the largest, hence oldest, rams in the herd. Consequently, the Department manages sheep as a high quality hunting opportunity and takes precautionary steps to ensure that ample numbers of mature rams are left in the population. The result is a relatively high harvest success (mean = 92%) and post-season ram: ewe ratios that are favorable for growing bighorn sheep populations. At the same time, a few hunters are willing to increase their chances to procure a permit by participating in auctions and/or raffles, the proceeds of which are expended entirely on bighorn sheep management and conservation. Providing all of these opportunities on an equitable and sustainable manner is a challenge.

Objective 62:

Provide recreational hunting season opportunities for individual bighorn sheep herds using harvest strategies that maintain demographic stability, typical breeding behavior, and minimize the probability of undesirable evolutionary consequences.

Strategies:

a. Conduct bighorn sheep hunts by permit only and allow harvest of any ram.

Table 2. Permit levels for all bighorn sheep herds.

<table>
<thead>
<tr>
<th>Permit level is…</th>
<th>…when the herd has…</th>
<th>Population</th>
<th>Ram:ewe</th>
<th>Number rams with…</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Size a</td>
<td>ratio</td>
<td>&gt;½ curl b</td>
</tr>
<tr>
<td>20% of the mature rams d</td>
<td>≥50</td>
<td>&gt;50:100</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>15% of the mature rams d</td>
<td>≥50</td>
<td>25-50:100</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>10% of the mature rams d</td>
<td>≥50</td>
<td>&lt;25:100</td>
<td>8</td>
<td>2</td>
</tr>
</tbody>
</table>

a Total population size, excluding lambs. Population must be stable or increasing.
b Used as a measure of >3-year-old rams.
c Used as a measure of >6-year-old rams.
d Rams >½ curl.

b. As a guideline, set ram permit levels as indicated in Table 2 above:
For example, if a herd was estimated at > 50 animals, the ram:ewe ratio was between 25-50 per 100 ewes, and the number of the number of rams with ½ curl was > 8 and at least 2 of those 8 rams were > ¾ curl, ram permit level would be set at 15% of the estimated number of ½ curl or greater rams. Generally, no ram permits would be issued for populations with fewer than 50 animals, and/or with fewer than 8 ½ curl or greater rams.

c. Adjust permit levels for herds bordering other states and provinces to account for management activities of these other areas.

d. Consider reducing permit levels or terminating all permits (depending on population size and rate of decline) for herds declining due to disease or high parasite loads.

e. Consider providing ram permits in excess of Table 2, on a case-by-case basis, when evidence suggests that a high ratio of rams to ewes increases the risk of ram forays outside of normally used areas, and thus of contact with domestic sheep or goats.

f. Use trap and relocation as the primary method of reducing overpopulated herds, nuisance activity, or agricultural damage. Consider ewe harvest as a secondary method, with the following conditions:
   1. Ewe permits should not exceed 10-20% of the adult ewe population.
   2. A harvested ewe would not count toward the one sheep a hunter can harvest in a lifetime.

**Objective 63:**

Provide opportunity for auction tags and raffle tags in a manner that enhances predictability for both bighorn herd managers and the hunting public, while maintaining or increasing the desirability of these unique opportunities.

**Strategies:**

a. By 2016, develop and implement allocation formula for existing auction and raffle permits that provides for increased opportunity to take trophy-sized rams from bighorn herds that have not historically been available, while also minimizing the risk of excessive harvest.

b. The Swakane herd will be managed as the state’s sole “trophy quality” herd. Draw permit levels will be calculated based on Table 2, as with other herds. However, auction and/or raffle permits will be limited to 1-year. Other herds may sustain > 1 auction/raffle/year, but a point system will be developed to ensure long-term sustainability of old-aged rams.

**Enforcement**

**Issue Statement**

Because there are only about 1,300 bighorn sheep in Washington, illegal harvest or harassment has the potential to impact populations. Unfortunately, the rarity and majestic nature of mature rams (i.e., their horns) along with limited hunting opportunity makes them likely targets for illegal take.

**Objective 64:**

Account for all known bighorn sheep mortalities. Clarify rules and regulations to provide the Department and the public with clarity regarding the possessing of bighorn skulls, heads, and horns.
**Strategies:**

a. Permanently mark the horns of all dead bighorn sheep rams that are recovered from the field.
b. Continue existing mandatory reporting for all bighorn sheep hunters.
c. Work with Washington Department of Transportation (WDOT) to increase awareness among motorists of the potential for encountering bighorn sheep along highways in specifically-identified areas.

**Predation**

**Background**

Black bears, cougars, coyotes, bobcats, and wolves all prey on bighorn sheep at times. Predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3.

If the WDFW determines that wolf predation is a primary limiting factor for an “at-risk” ungulate population, and the wolf population in that wolf recovery region has at least 4 successful breeding pairs, the WDFW can consider reducing wolf abundance in localized areas occupied by the ungulate population before state delisting of wolves occurs.

At-risk ungulate populations are any that are federal or state listed as threatened or endangered (e.g., Selkirk Mountain woodland caribou, Columbian white-tailed deer). An at-risk population would also include any ungulate population which falls 25% below its population objective for two consecutive years or if the harvest decreases by 25% below the 10-year average harvest for two consecutive years.

For ungulate populations lacking numeric estimates and/or without management objectives, the WDFW will rely on other information to assess a decline, such as harvest trends, hunter effort trends, sex and age ratios of the population, and others (WDFW 2011).

**Objective 65:**

Identify herds that are below population objectives where predation effects might be a limiting factor by 2015.

**Strategies:**

a. Develop a prioritized list of herds where predators might be limiting factors.
b. Identify the biological parameters that implicate predators as the factor.
c. Population status, harvest history, etc.
d. Invoke the predator-prey guidelines.

**Research**

**Issue Statement**

Bighorn sheep are vulnerable to parasites and diseases that significantly impact population levels. In addition, small population sizes create situations where predators and inbreeding can cause impediments to population growth.
**Objective 66:**
Continue active participation in research oriented toward understanding and ultimately managing limiting factors produced by disease, predation, and genetic factors.

**Strategies:**


b. Work collaboratively with Idaho Department of Fish and Game, Oregon Department of Fish and Wildlife, Washington State University, or other research universities on disease research specifically addressing disease related issues between domestic and bighorn sheep.

c. Collect data for each herd opportunistically for assessing herd health.

d. Monitor situations where predation may be depressing bighorn populations below management goals, and if feasible and consistent with other WDFW objectives and policies, respond appropriately.

**VI. LITERATURE CITED**


MOUNTAIN GOAT (*Oreamnos americanus*)

Mountain goat populations in Washington have declined considerably from their historic abundance. Historically, goat populations may have been as high as 10,000 animals. As of 2008, mountain goats in Washington were estimated to number approximately 2,800 (with uncertainty ranging from ~2,401 to ~3,200; Rice, 2012; although surveys during 2012-2014 suggest a modest upturn in population levels statewide. Hunting opportunity has decreased accordingly, and current permit levels are conservative and represent ≤4% of the known population in herds that are large enough to sustain harvest. Despite reductions in hunting opportunity, many local goat populations remain low. However, a few populations are doing well. Goat populations in the Darrington area west of Glacier Peak, along the northern shore of Lake Chelan, surrounding Mount Baker, and in the Alpine Lakes Wilderness Areas appear to have increased in recent years. Other populations, for example in the upper elevation regions west of Methow, may have declined.

II. RECREATIONAL OPPORTUNITY

Mountain goats have been hunted in Washington State since 1897, when hunters could harvest two goats annually (Johnson 1983). Following several years of excessive hunting, seasons were restricted in 1917 and all hunting closed by 1925. Later, goat populations recovered and hunting resumed in 1948. Since 1948, mountain goat hunting opportunity has been limited by permit. However, managers continued to issue more permits than most goat populations could sustain. There is little doubt that excessive legal harvest played a large role in the decline of mountain goats in Washington, as occurred in other jurisdictions.

The number of mountain goats legally harvested in Washington decreased dramatically during the period 1960-2005 (Rice and Gay 2010). Hunting opportunity has also declined; from 218 permits in 1991 to 18 permits in 2008 and to 14 permits in 2013. In recent years, the number of permit applications per hunt area has varied from just under 1,000 to over 5,000, but because most applications include the maximum of 4 hunt choices, the average number of applications/mountain goat permit in 2013 was ~ 724. The hunting season for mountain goat is generally for two months (September 1 to October 31), and overall harvest success during 6 most recent years (2008-2013) was 81%.

Currently, mountain goat hunting is a once-in-a-lifetime opportunity. Hunters may harvest any adult goat with horns ≥4 inches. Hunters are urged not to harvest a nanny. During the 2013 season, only a fraction of the mountain goat range was open to hunting, with 14 permits in 10 goat units.
III. DATA COLLECTION

Limited funding continues to affect the Department’s ability to conduct thorough and consistent surveys in all areas with mountain goats. Most surveys are conducted using a helicopter (a few populations allow for counts from the ground) and generally occur in July or August (Gonzales-Voyer et al. 2001). During the past few years, annual surveys have been conducted in areas supporting mountain goat hunts, but this has occurred at the expense of a better understanding of population dynamics elsewhere. The Department will continue to monitor hunted mountain goat populations to provide for hunting opportunity while guarding against possible over-harvest. During this planning period, increased attention will be given to better understand the status of mountain goats in areas where they were not hunted during 2009-2015. This may provide additional hunter opportunity, and may also help direct efforts to recover populations that continue to struggle. Results from the Department’s long-term study of mountain goats are now all published (see literature cited below), and where applicable, these findings have been incorporated into management planning.

IV. MOUNTAIN GOAT MANAGEMENT GOALS

The statewide goals for mountain goats are:

1. Perpetuate and manage mountain goats and their habitats to ensure healthy, productive populations and long-term genetic connectivity.
2. Manage mountain goats for a variety of recreational, educational, and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Enhance statewide mountain goat populations and manage goats for a sustained yield.
4. Where conflicts with recreationists have been documented and ongoing, minimize habituation and conditioning of mountain goats to humans, thus reducing the threat to both humans and mountain goats.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Population Management

Issue Statement

Mountain goat populations typically occur as meta-populations scattered across the landscape on “habitat islands” where topographic and vegetative characteristics are suitable for goats. The sizes and distribution of these islands of suitable habitats have recently been documented in Washington (Wells 2006, Shirk et al. 2010, Parks 2013). Understanding the spatial relationship between these habitats and mountain goat use from a meta-population perspective is critical for sustainable management of mountain goats.

Objective 67:

Revise existing goat management units to better reflect movement patterns, human access, and aerial survey units, while providing for close control of harvest and hunting recreational opportunity.
Strategies:

a. Examine existing information on mountain goat distribution and road access.
b. Review options with district biologists, Game Management Advisory Council, and request input from the public.
c. Publish revised maps and incorporate into WACs.

Issue Statement

Until recently, diseases have rarely been an important consideration in mountain goat management and conservation. As with any other species, mountain goats have their share of endemic diseases, some of which can kill individual animals, but none has been identified as a threat to populations. However, a dramatic decline among introduced mountain goats in the Ruby Mountains of Nevada due to pneumonia has elevated concern that goats elsewhere may contract or disseminate some of the same bacteria affecting bighorn sheep populations. The Nevada mountain goats are hypothesized to have been infected from sympatric bighorn sheep; subsequently, mountain goats moving into the Yellowstone National Park region have also been documented as carrying these bacteria. The potential for individually affected mountain goats to infect others, or possibly to serve as a vector of transmission to bighorn sheep is of concern, particularly as we consider reintroducing goats to currently unoccupied (or ‘under-occupied’) habitats.

Objective 68:

Continue opportunistic surveillance of mountain goats for bacterial pathogens that could cause disease and mortality in goats and/or in bighorn sheep should contact occur.

Strategies:

a. Contact holders of mountain goat hunting permits before the hunting season and ask for their assistance in obtaining veterinary samples.
b. Work with citizen groups to provide incentives to hunters in obtaining and providing veterinary samples.
c. Submit samples to the Washington Animal Disease Diagnostic Laboratory at Washington State University.

Issue Statement

Mountain goat populations are sensitive to over-exploitation because of their low population growth rate and relatively low densities (Kuck 1977, Hamel et al. 2006, Festa-Bianchet and Côté 2008, Festa-Bianchet and Smith 2001). As such, assessing the status of each mountain goat population frequently is necessary to ensure sustainability. However, monitoring goats using helicopters is both expensive and stressful to the animals (Côté et al. 2013).

Objective 69:

Monitor abundance of mountain goats within management units supporting recreational harvest bi-annually (or annually where justified) with sufficient precision that i) declines driven by external factors or by overharvest can be identified within a 4-year period, and ii) increases sufficient to justify an increase in harvest opportunity can be identified within a 4-year period.

Strategies:

a. Continue to improve and standardize mountain goat surveys (Rice et al. 2009).
b. Prioritize areas for survey where mountain goat populations are currently insufficiently quantified.
c. Where anecdotal evidence suggests recent increases or decreases in mountain goat populations not subject to regular aerial surveys, initiate, encourage existing, and/or cooperate with other government or non-government entities in ground-based surveys to provide data on geographic distribution and/or qualitative abundance estimates.

**Issue Statement**

Mountain goat populations have declined dramatically in some portions of the North Cascades. Research findings suggest historical hunting levels may have been too high and unsustainable for goats. As such, many of the areas that were historically hunted have been closed to hunting for several years. Although research on other potential causes of declines would be beneficial, there is a need to develop strategies for recovering the populations in these areas. Translocation efforts need to take place not only in the best possible habitats, but also be large enough (include sufficient number of animals) that success is likely (Harris and Steele, in press).

**Objective 70:**

Clarify the needs for recovery and/or augmentation of populations in the North Cascades by 2017. If the assessment (above) demonstrates a clear benefit to be gained from translocation, and mountain goats are available for such purposes, implement at least one translocation project (including monitoring capable of informing future projects) by 2020.

**Strategies:**

a. Finalize existing assessment and prioritization scheme of candidate translocation sites in the North Cascades.
b. Conduct site visits where feasible to confirm the site-specific attributes and appropriateness of top candidate sites.
c. Participate in the National Environmental Policy Act (NEPA) planning by the National Park Service to remove mountain goats from Olympic National Park.
d. Write an implementation plan for reintroducing mountain goats into areas identified through the planning process.

**Recreation Management**

**Issue Statement**

Mountain goat populations are sensitive to over-harvest (Hamel et al. 2006, Festa-Bianchet and Côté 2008); goats have a low reproductive potential, extended parental care, low juvenile survival, and relatively old age of sexual maturity. As a result, harvest levels for mountain goats should be restricted to levels that approximate recruitment (Rice and Gay 2010).

**Objective 71:**

Provide recreational hunting opportunities in individual mountain goat management areas at levels consistent with a stable or increasing population. In general, harvest of female goats (nannies) should be minimized to the degree possible, consistent with providing acceptable hunter opportunity.
Strategies:

a. Provide all mountain goat hunters with both an educational video and an illustrated pamphlet on identifying mountain goat gender under field conditions.

b. Continue to manage abundance and harvest on a population management area level.

c. Initially, population estimates must be >100 goats within an identified hunting area before that group of mountain goats can be subject to recreational harvest. See item d. below.

d. Re-evaluate the existing requirement that mountain goat populations exceed 100 animals before they can be considered for recreational harvest by 2017.

e. Initially, for herds meeting the minimum abundance criteria, permits shall be issued to limit the goat harvest to 4% or less of the estimated local population aged one year-old and above. See item g, below.

f. Recommend mandatory in-person registration by hunters of harvested mountain goats or other means by 2015 to allow WDFW inspection of sex and age of harvested animals (Harris et al.2012), as well as collection of biological samples for disease screening.

g. Investigate, assess, and propose a “point” system that, reflecting the differences in their demographic consequences, scores the effects of female (nanny) harvest on goat populations more strongly than of male (billy) harvest. This system will be designed to both discourage hunting of nannies, and while doing so, to provide enhanced hunter opportunity to harvest billies, while still safeguarding the demographic and genetic health of individual mountain goat populations. The total number of goat permits could be allowed to rise above 4% if sufficient documentation is made of a series of sufficiently male-dominated harvests.

h. Where mountain goats have been introduced to areas where they were not endemic, land management agencies view them differently than native species, and where goats can potentially become nuisances and safety concerns to people, reduce mountain goat density by providing hunter opportunity without the sustainability constraints imposed by the previous strategies.

Objective 72:

Provide opportunity for auction tags and raffle tags in a manner that enhances predictability for both mountain goat herd managers and the hunting public, while maintaining or increasing the desirability of these unique opportunities.

Strategies:

a. By 2016, develop and implement allocation formula for existing auction and raffle permits that provides for increased opportunity to take older age class billies from mountain goat herds that have not historically been available, while also minimizing the risk of excessive harvest.

Research

Long-term research on mountain goats in Washington, conducted during 2002.-2011, is now complete and has been published (Bues 2010; Parks 2013; Rice and Hall 2007; Rice 2008, 2010, 2014; Rice et al. 2009; Rice and Gay 2010; Shirk et al. 2010; Wells et al. 2011, 2012).
Conflicts with Recreationists

Issue Statement

Mountain goats in certain locations within Washington have lost their natural wariness around humans (i.e., become habituated to human presence). In many cases, mountain goats have become conditioned to expect a reward (usually salt, but possibly also food) from humans. Although mountain goats are unlikely to be negatively affected directly by such habituation and conditioning, the combination of these behavioral changes with their natural inclination to be aggressive with one another, possess a risk of human injury. In turn, mountain goats may have to be lethally removed in deference to human safety.

Objective 73:

Reduce the potential for mountain goat/human conflict through decreasing the incidence of habituated and/or conditioned goats, as well as the intensity of habituation/condition of individual goats that frequent heavily used recreation areas.

Strategies:

a. Work with land management partners at the federal and state level to develop and disseminate educational material to the public designed to improve compliance with recommended behaviors near mountain goats.

b. Where feasible, work with land management partners to investigate seasonal dynamics, movements, and drivers of mountain goat habituation and/or conditioning at selected high-use recreational areas.

c. Improve current systems of communication and coordination among land managers and wildlife managers to respond to reports of aggressive, inquisitive, or insistent mountain goats.

d. Integrate communication and coordination in responding to dangerous goats.

e. Where feasible and needs warrant, conduct hazing, aversive conditioning, and if necessary, lethal removal of nuisance mountain goats.

VI. LITERATURE CITED


MOOSE (Alces alces)

I. POPULATION STATUS AND TREND

The number of moose in Washington increased from about 60 in 1972, to an estimated 850-1,000 in 2002 (Poelker 1972, Base et al. 2006). It has continued to increase since that time, and WDFW projected approximately 1,500-2,000 moose in 2008. This increase is the result of both increased moose density in prime habitats and colonization of moose into new areas. Today, moose occur primarily in the northeastern counties of Ferry, Pend Oreille, Stevens, and Spokane (Figure 1). Moose are occasionally documented in Chelan, Lincoln, Whitman, Okanogan, and Whatcom Counties, and a few animals have been documented in surrounding areas and in the Blue Mountains. This increase contrasts with a number of moose populations in other states of the U.S. that have recently declined, particularly non-introduced populations along the southern fringe of their native distribution. Causes for these declines have varied (and in many cases remain imperfectly known), but likely include habitat changes (particularly loss of early seral shrub-fields), increases in the effects of parasites (possibly induced by climate change), direct effects of climate change, and increases in predation.

II. RECREATIONAL OPPORTUNITY

Moose hunting in Washington began in 1977 with three permits in the Selkirk Mountains. Since then, moose populations have increased and expanded and the number of permits has increased accordingly. In 2013, approximately 140 moose permits were issued, all within Districts 1 and 2. Since 1977, moose hunting has been limited by permit and the demand for moose hunting is high. The number of applications for moose permits far exceeds the supply. In 2013, 32,097 applicants applied for the 140 available permits.

Currently, moose hunts are by permit only, and if drawn, it is a once-in-a-lifetime opportunity (except antlerless hunts). Hunting season dates are October 1 - November 30, and hunters may use any legal equipment. Moose hunts are either “any moose” or “antlerless only”. In “any moose” hunts, the majority of the harvest is adult bulls. Hunters typically see several moose/day and harvest success has been high (over 90%) during the past decade. All moose hunters are required to report their hunting activities online, regardless of whether they harvest a moose or not.
III. DATA COLLECTION

In recent years, the Department had conducted aerial surveys of moose in selected areas annually. Surveys have typically been conducted during early winter (prior to antler drop by bulls), with the data being used to estimate calf recruitment, sex ratio, and population trend. In addition to surveys, the Department monitors trends in harvest data, including number of hunters, total harvest, days hunted/kill, harvest success, moose seen while hunting, antler spread (if harvested a bull), and age of harvested moose.

IV. MOOSE MANAGEMENT GOALS

The statewide goals for moose are:

1. Preserve, protect, perpetuate, and manage moose and their habitats to ensure healthy, productive populations.
2. Manage moose for a variety of recreational, educational, and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Manage statewide moose populations for a sustained yield.
4. Manage moose populations with a rigorous, data-based system.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Habitat Management

Issue Statement

Habitat quality influences moose reproduction, survival, and abundance. Unfortunately, habitat conditions are deteriorating in some areas important for moose, primarily due to the spread of noxious weeds, human development, forest succession, use of herbicides to reduce shrub competition with tree seedlings, and fire exclusion. Improving habitat quality for moose, where possible, is likely to improve reproduction and growth, particularly among young animals. WDFW manages little moose habitat directly. However, WDFW has a responsibility to work with landowners, and voice concerns about forest maturation and use of herbicides in shrub-fields.

Objective 74:

Ensure that moose habitat requirements are incorporated into land-use planning and practices.

Strategies:

a. Work with land-owners responsible for moose habitat to ensure that moose habitat requirements are incorporated into land-use planning and practices.

Population Management

Issue Statement

Currently, the status of moose populations is estimated through aerial surveys. Surveys have occurred annually, but have covered only selected portions of the known moose distribution (and only within Region 1). Although these surveys have most likely reflected gross population trends,
they have lacked a statistical foundation, and have had an uncertain relationship to areas not
surveyed. They have also not provided data that could be used to estimate population size with a
statistical basis. Sightability approaches, used for moose in some states and provinces (Anderson
and Lindzey 1996, Quayle et al. 2001, Guidice et al. 2012) are likely to be unreliable for moose in
northeastern Washington (Harris et al., in review. In 2013, the Department initiated a pilot-project
incorporating more intensive and rigorous sampling approaches. However, this approach is
expensive and probably not sustainable economically over the long-term.

**Objective 75:**

Produce a statistically-valid estimate of moose abundance within moose habitats in Districts 1 and
2 (Ferry, Pend Oreille, Spokane, and Stevens counties) by 2017.

**Strategies:**

a. Continue to develop, test, and employ the most effective and efficient survey techniques for
   moose.

b. Continue mark-recapture distance sampling surveys from a helicopter platform through winter
   2014-15, and through 2015-16 if funding allows.

c. Produce peer-reviewed publication on abundance estimation approach by 2017.

**Objective 76:**

Develop alternative approaches to population assessment that do not require annual helicopter
surveys for estimating moose population trends by 2021.

**Strategies:**

a. Initiate hunter-reporting based metrics of moose abundance, and assess their predictive
   efficiency of moose population trends by calibrating them to trends estimated using aerial
   surveys (e.g., Ericsson and Wallin 1999, Solberg and Saether 1999, Boyce et al. 2012).

**Objective 77:**

Obtain initial, rough estimates of abundance and population trend in District 3 (Region 1), and
District 6 and 7 (Region 2) by 2019.

**Strategies:**

a. Initiate surveys, incorporating lessons learned during 2013-16 in Districts 1 and 2, in District
   3’s (Region 1), and Districts 6 and 7 (Region 2) by 2019.

**Issue Statement**

Parasitism is a known component of moose ecology; in many cases, individual moose may
succumb but populations remain little affected. However, in recent years parasites have been
suspected as causative agents in large-scale moose declines. One ectoparasite, the winter tick
(*Dermacentor albipictus*; Samuel 2004, 2007), and one endoparasite, an arterial worm *Eleaophora
schneideri*; Henningsen et al. 2012), are known to be present in Washington. Both winter ticks and
arterial worms (Pessier et al. 1998) are known to afflict Washington moose, although their
importance to individuals and populations in Washington remains unstudied. Other diseases and
parasites may affect moose populations (Murray et al. 2006, Lancaster and Samuel 2007). If
moose population density increases or decreases, habitat characteristics change, predation
pressures fluctuate, and climate change continues. Understanding the role of parasites in moose
demographics will aid the Department’s response.
**Objective 78:**
Monitor the effects of diseases and parasites on moose populations by surveillance of samples provided by hunters as well as opportunistically obtained carcasses.

**Strategies:**

a. Continue, improve, and expand veterinary surveillance of hunter-supplied moose carcasses for parasites and diseases hypothesized to be endemic and capable of inducing mortality.

b. Work with WDFW enforcement to procure additional samples for veterinary testing when opportunities arise.

c. Work with other agencies (e.g., Department of Transportation) to procure additional samples for veterinary testing when opportunities arise.

**Objective 79:**
Monitor changes in the geographic distribution of moose throughout Washington.

**Strategies:**

a. Maintain and improve citizen-science web-based monitoring of moose observations.

**Issue Statement**
Moose occasionally come into conflict with, and pose a danger to humans, particularly at the wildland/urban interface. Dealing with such conflicts in a cost-effective and biologically sustainable manner is a challenge.

**Objective 80:**
Minimize risks to human safety and property by managing moose conflicts at the wildland-human interface.

**Strategies:**

a. Continue to translocate, and where no other options exist, humanely euthanize moose that cannot be safely hazed away from dangerous encounters with human in urban and suburban settings.

b. Evaluate history of problem moose control efforts to identify patterns and recommend strategies to minimize future conflicts by 2017.

**Research**

**Issue Statement**
Although moose have increased in both density and geographic distribution within Washington during the past few decades, we expect to see a tempering, and perhaps reversal of this dynamic over the next few years as moose colonize suitable habitat and reach carrying capacity. Adding to stresses we would expect to individual moose are continued forest succession with the attendant reduction of shrubby browse that form the staple of most moose diets (Vartanian 2011), warming temperatures (Lenarz et al. 2010, Brown 2011; see also Lowe et al. 2010, Murray et al. 2012), and predation from wolves (Kunkel et al. 1999, Hayes et al. 2000), which will add to existing levels of predation from bears (Ballardet et al. 1990) and cougars (Ross and Jalkotzy 1996, Bartnick et al. 2013). Harvest management in the future will require better information than currently exists on how moose interact with the non-human environment (Nilsen et al. 2005).
Objective 81:
Complete a study of moose demography in identified study areas within Districts 1 and 2, with the objectives of better understanding determinants of moose population dynamics with respect to bottom-up (habitat) and top-down (predation) factors.

Strategies:

a. Assess calf recruitment and survival as functions of biotic and abiotic drivers.
b. Evaluate the relative importance of predation, habitat changes, moose population density, and climate-related factors in influencing vital rates.
c. Produce peer-reviewed publications with academic partner (University of Montana) by 2018.

Recreation Management

Issue Statement
The demand for moose hunting opportunity exceeds the allowable harvest for sustainable moose populations. As such, the Department restricts moose harvest to a level compatible with long-term sustainability, and offers permits only through drawings. This strategy allows the Department to manage moose harvest as a high quality hunting opportunity, with moderate densities of moose and opportunity to harvest mature bulls. Periodically adjusting antlerless permit numbers also allows the Department to reduce moose density where conflicts with humans are unacceptable, and to encourage moose population growth if non-harvest factors induce declines. This strategy has produced relatively high harvest success, as well as post-season bull:cow ratios that are conducive to natural dynamics of reproduction. An increase in the number of moose permits would help to satisfy some of the pent-up demand among some hunting constituencies, but might come at the expense of hunting success rate and/or bull trophy quality.

Objective 82:
Develop moose harvest strategies that take advantage of new objective and accountable modeling approaches, and that use emerging data on local demography and population trend.

Strategies:

a. Re-visit and revise current harvest strategies (see Table 1, below, used since 2003).
b. Evaluate the risks and benefits of currently-used “any moose” permits compared with “antlered moose” permits.
c. Evaluate the applicability of integrated modeling approaches (either maximum likelihood or Bayesian approaches), given newly emerging data on population abundance, trend, survival, and recruitment.
d. Continue to offer maximum hunter opportunity, consistent with the goals of maintaining a sustainable yield, as well as the ecological role of moose within their native ecosystems.
e. Maintain “permit only” moose hunting, but assess whether increasing the number of permits can be accomplished while addressing other objectives.
Table 1. Moose harvest guidelines used in previous two Game Management Plans. These guidelines will be assumed to apply until data-based models are developed, assessed, and applied.

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Harvest</th>
<th>Liberalize</th>
<th>Acceptable</th>
<th>Restrict</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average bull:100 cow ratio</td>
<td>&gt;75 bulls</td>
<td>60-75 bulls</td>
<td>&lt;60 bulls</td>
<td></td>
</tr>
<tr>
<td>Average calf:100 cow ratio</td>
<td>&gt;45 calves</td>
<td>30-45 calves</td>
<td>&lt;30 calves</td>
<td></td>
</tr>
<tr>
<td>Median age of harvested bulls</td>
<td>&gt;5.5 years</td>
<td>4.5-5.5 years</td>
<td>&lt;4.5 years</td>
<td></td>
</tr>
</tbody>
</table>

a. Averaged over a 3-year period
b. Modified from Courtois and Lamontagne 1997

Predation

Background

Black bears, cougars, and wolves all prey on moose especially calves. Predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3.

If the WDFW determines that wolf predation is a primary limiting factor for an “at-risk” ungulate population, and the wolf population in that wolf recovery region has at least 4 successful breeding pairs, the WDFW can consider reducing wolf abundance in localized areas occupied by the ungulate population before state delisting of wolves occurs.

At-risk ungulate populations are any that are federal or state listed as threatened or endangered (e.g., Selkirk Mountain woodland caribou, Columbian white-tailed deer). An at-risk population would also include any ungulate population which falls 25% below its population objective for two consecutive years or if the harvest decreases by 25% below the 10-year average harvest for two consecutive years.

For ungulate populations lacking numeric estimates and/or without management objectives, the WDFW will rely on other information to assess a decline, such as harvest trends, hunter effort trends, sex and age ratios of the population, and others (WDFW 2011).

Objective 83:
Identify herds that are below population objectives where predation effects might be a limiting factor by 2015.

Strategies:

a. Develop a prioritized list of local populations where predators might be limiting factors.

b. Identify the biological parameters that implicate predators as the factor.

c. Population status, harvest history, etc.

d. Invoke the predator-prey guidelines.

VI. LITERATURE CITED


PRONGHORN ANTELOPE (*Antilocapra americana*)

I. POPULATION STATUS AND TREND

Pronghorn antelope are native to the Columbia Basin of eastern Washington, but were extirpated sometime prior to the mid-nineteenth century (Lyman 2007). Based on archeological data, Lyman (2007) concluded that pronghorns were never numerous in Washington, but that herds may have drifted in and out depending on large-scale climatic fluctuations or migratory patterns. Washington does not constitute part of the core geographic distribution of pronghorn, but does form part of their historic range. Reasons for their earlier extirpation are not entirely clear.

From 1938 to 1968, WDFW conducted 6 releases at 4 sites in eastern Washington, but all attempts failed to establish a sustainable population. The small number of adult animals released, questionable habitat quality at release sites, and minimal monitoring likely hindered those early attempts. The Department remains interested in exploring the potential for re-establishing pronghorn in Washington. A habitat assessment suggested that suitable pronghorn habitat does exist in eastern Washington (Tsukamoto et al. 2006). However, most land suitable for pronghorns is either located primarily on private lands or government-owned land on which wildlife conservation is not a high priority, is fragmented by lands unsuitable for pronghorns, or both.

In January 2011, the Yakama Nation released 99 pronghorns on the Yakama Reservation; these animals have since expanded their range to areas outside the reservation. Reproduction among these animals has been documented, and preliminary indications are that the reintroduction has been successful. As of early 2014, at least one small group of pronghorn from this reintroduction effort appeared to have established themselves on private land south of the Yakama Reservation. Independently, a very small band of pronghorns has been documented recently in Asotin and Garfield counties; these are hypothesized to have originated from the nearest population in northeastern Oregon.

II. RECREATIONAL OPPORTUNITY

Pronghorns are currently classified in the state of Washington as a game animal. As such, they may be taken only in the context of an authorized season. There are currently no hunting seasons established by the Fish and Wildlife Commission for pronghorns. At present, pronghorns cannot be legally hunted on lands under jurisdiction of the state of Washington. Opportunity for viewing pronghorns in Washington is currently limited because of their scarcity and presence primarily on private lands.

III. DATA COLLECTION

Because there are currently so few pronghorns, no formal protocols exist to monitor or survey pronghorns.
IV. MANAGEMENT GOALS

The statewide goals for pronghorns are:

1. As time and funding permits, monitor existing fragmentary pronghorn populations to anticipate the point at which more active management may be necessary.
2. As time and funding permits, work with private land-owners to ensure that conflicts with agriculture are minimal.
3. As time and funding permits, work with interested private parties to investigate the biological, social, and economic feasibility of landowner-driven pronghorn reintroductions.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Habitat Management

Issue Statement
Currently, pronghorns in Washington are primarily found on private land (in contrast to pronghorn distribution in most other states, where approximately half are found on public lands, Yoakum 2004). Although forage competition between pronghorns and cattle tends to be minor, overlap among food items does occur in specific circumstances.

Objective 84:
Communicate with owners of private lands on which small groups of pronghorns have been documented, to understand the degree to which pronghorns present a conflict to agricultural interests.

Strategies:
- a. Maintain documentation of specific land-owners with frequent pronghorn interactions.
- b. Investigate complaints to forage competition.
- c. Develop a mechanism for assessing and mitigating damage.

Population Management

Issue Statement
Small, scattered, and possibly non-viable groups of pronghorns have recently moved onto lands under Departmental jurisdiction, typically on private lands. To maintain a positive attitude among land-owners toward pronghorns, it is important that agricultural damage be minimized. At the same time, should these populations increase to the point that they may become established and sustainable, monitoring and understanding their dynamics will become increasingly important.

Objective 85:
Keep current on the status of small, fragmented populations of pronghorns in Washington by keeping a database of reports obtained from the public and agency sources.

Strategies:
- a. Maintain and update Departmental databases.
b. If populations increase, and/or move to areas with higher potential for conflict, develop mechanism for funding and implementing direct monitoring system (e.g., radio-telemetry, targeted surveys).

**Issue Statement**

Pronghorn recovery in Washington would be hastened by a successful reintroduction onto lands that are both biologically and socially suitable. However, reintroduction is expensive and will only succeed where supported by local communities.

**Objective 86:**

As time and funding permits, work with private parties prepared to take the lead in reintroducing pronghorns to investigate the biological, social, and economic feasibility of specific proposals.

**Strategies:**

a. Coordinate necessary biological feasibility studies.
b. Coordinate necessary (SEPA or NEPA) public processes.
c. If both biological feasibility and public processes indicate that pronghorn reintroduction is suitable and funding sources are identified, develop site-specific plans.

**VI. LITERATURE CITED**


BLACK BEAR (*Ursus americanus*)

I. POPULATION STATUS AND TREND

Washington State has an abundant and healthy black bear population, however currently there is no formal estimate of black bear population size in Washington. For management purposes, the state is divided into nine black bear management units (BBMUs) (Fig. 1). Harvest levels vary between BBMU depending on hunter effort and local population size and habitat conditions. To maintain stable bear populations, modifications to harvest levels are made on a three-year rotation. The total harvest, the percentage of females in the total harvest, and median ages of harvested males and females are used by WDFW as general indicators of exploitation (Beecham and Rohlman 1994).

II. RECREATIONAL OPPORTUNITY

The majority of bear hunting opportunity is in the fall, but a limited permit-only spring hunt is available. Spring hunts are designed to address emerging management needs, such as bear damage to trees in commercial timberlands, bear-human conflict, or to more evenly distribute harvest compared to fall seasons. Since 2006, the average harvest during fall and spring (excludes bears harvested under depredation permits) seasons were 1,549 and 21 bears, respectively (Table 1).

III. DATA COLLECTION

Assessing the status of a bear population is extremely difficult given their secretive nature. Nonetheless, WDFW has conducted some important black bear research. From 1963 to 1969, WDFW studied black bear damage in coniferous forests and gathered basic demographic information that was used to establish management guidelines (Poelker and Hartwell 1973); this led to the black bear becoming protected as a game species in 1969. Lindzey et al. (1986) monitored black bears on Long Island in southwestern Washington for eleven years beginning in 1972 and estimated population size in response to habitat changes that occurred after intensive timber harvest. The next study occurred from 1994-1999, when WDFW studied survival, habitat use, home range size, and cause specific mortality in three ecoregions in Washington (Koehler et al. 2001; Koehler and Pierce 2003; Koehler and Pierce 2005). In the late 1990s, WDFW also conducted bait station surveys to evaluate the technique as a population index of bear abundance (Rice et al. 2001). However, an analysis of statistical power indicated that at the level of survey intensity, WDFW would not be able to detect a change in bear abundance. As part of a baseline survey prior to the Elwha dam removal on the Olympic peninsula, Sager-Fradkin et al. (2008) studied bears from 2002-2006 in the Elwha Valley to estimate home range size and habitat use.
Finally, WDFW conducted some preliminary research on survival and population size in Capitol Forest from 2005-2011 (Beausoleil et al. 2012).

**Table1: Statewide black bear harvest, hunter effort, and median age information, 2003-12, Washington Department of Fish and Wildlife.**

<table>
<thead>
<tr>
<th>Year</th>
<th>Male</th>
<th>Female</th>
<th>Total Harvest</th>
<th>% of Hunters</th>
<th># Success</th>
<th>% Hunter Days</th>
<th># Days per kill</th>
<th>Median Age</th>
<th>% Females</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003</td>
<td>989</td>
<td>583</td>
<td>1,556</td>
<td>22,510</td>
<td>7%</td>
<td>192,544</td>
<td>123</td>
<td>3.5</td>
<td>4.5</td>
</tr>
<tr>
<td>2004</td>
<td>1,093</td>
<td>561</td>
<td>1,654</td>
<td>21,573</td>
<td>8%</td>
<td>186,626</td>
<td>113</td>
<td>3.5</td>
<td>5.5</td>
</tr>
<tr>
<td>2005</td>
<td>940</td>
<td>333</td>
<td>1,333</td>
<td>20,724</td>
<td>6%</td>
<td>172,527</td>
<td>129</td>
<td>3.0</td>
<td>5.0</td>
</tr>
<tr>
<td>2006</td>
<td>1,061</td>
<td>581</td>
<td>1,642</td>
<td>21,801</td>
<td>8%</td>
<td>168,237</td>
<td>103</td>
<td>3.0</td>
<td>4.0</td>
</tr>
<tr>
<td>2007</td>
<td>1,096</td>
<td>489</td>
<td>1,585</td>
<td>23,667</td>
<td>7%</td>
<td>168,237</td>
<td>106</td>
<td>3.0</td>
<td>5.0</td>
</tr>
<tr>
<td>2008</td>
<td>1,450</td>
<td>758</td>
<td>2,208</td>
<td>26,347</td>
<td>8%</td>
<td>215,032</td>
<td>102</td>
<td>3.0</td>
<td>5.0</td>
</tr>
<tr>
<td>2009</td>
<td>931</td>
<td>465</td>
<td>1,396</td>
<td>23,767</td>
<td>6%</td>
<td>192,347</td>
<td>147</td>
<td>3.0</td>
<td>6.0</td>
</tr>
<tr>
<td>2010</td>
<td>1,254</td>
<td>718</td>
<td>1,972</td>
<td>24,118</td>
<td>8%</td>
<td>185,389</td>
<td>98</td>
<td>2.9</td>
<td>4.7</td>
</tr>
<tr>
<td>2011</td>
<td>N/A</td>
<td>N/A</td>
<td>1,503</td>
<td>21,852</td>
<td>7%</td>
<td>166,814</td>
<td>111</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>2012</td>
<td>1,054</td>
<td>499</td>
<td>1,633</td>
<td>21,656</td>
<td>7%</td>
<td>161,459</td>
<td>104</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

In 2013, WDFW launched a study, in collaboration with WSU, to assess population size on 2 study areas (in both eastern and western WA) using 2 techniques simultaneously (capture/collar and DNA) to obtain information on the parameters needed to model and estimate the statewide black bear population.

**IV. HUMAN-BEAR CONFLICT**

Human-bear conflict occurs statewide given the distribution of bears in Washington, their adaptability to suburban environments, and the prevalence of attractants. Approximately 525 human-bear interactions are documented annually (Washington Dept. of Fish and Wildlife 2012). There is a tendency to equate levels of human-bear interactions with bear abundance. However, bear conflict activity is not a good indicator of population status, as it more likely reflects the variability of environmental conditions. For example, in 2010 human-bear complaints were at an all-time high, the same year Washington experienced a late spring with poor forage conditions for black bear, followed by a poor fall huckleberry crop.

**V. MANAGEMENT**

Washington has a unique and challenging situation when it comes to management of our black bear population. Washington is the smallest of the 11 western states, yet has the second highest human population; a population that continues to grow at record levels. Given that approximately 75% of the black bear habitat is in federal or private industrial ownership, a large portion of core black bear habitat is relatively secure. This means that the long-term outlook for black bears is generally good.

**VI. BLACK BEAR MANAGEMENT GOALS**

The statewide goals for black bear are:

1. Preserve, protect, perpetuate, and manage black bear and their habitats to ensure healthy, productive populations.
2. Minimize human-bear conflicts while at the same time maintaining a sustainable and viable bear population.
3. Manage black bear for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
4. Manage statewide black bear populations for a sustained yield.
5. Improve our understanding of predator-prey relationships.

VII. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Population Management

Issue Statement
Managers often use sex and age structure data of harvested bears as an index to population growth (Pelton 2000). However, examining just sex and age structure may provide misleading interpretations (Caughley 1974, Bunnell and Tait 1981, Garshelis 1991, Clark 1999). That is, the age structure of a declining bear population can be the same as the age structure in an increasing population. In addition to this shortcoming, there is often a time lag between when a population begins to decline and when that decline is evident in sex and age structure data (Harris 1984). In some cases, by the time a decline is detected, bear numbers may have been reduced to a point where it could take as long as 15-years to recover the population. However, detecting a decline early can enable managers to make a quicker recovery or retain stability.

Sensitivity analyses of bear populations indicate that adult female and cub survival are the most influential parameters to population growth rates (Clark 1999). As such, managers should focus survey efforts on improving the estimates of these parameters, as well as changes in population size and evaluation of harvest data (Clark 1999).

Objective 87:
Monitor population demographics and determine population densities in at least two ecoregions of Washington.

Strategies:
a. Use current and past black bear research conducted in WA to estimate black bear abundance.
b. Estimate population growth using data from long-term monitoring projects, research projects, and modeling.
c. Use sex and age ratios of harvested bears as a secondary indicator of population change.
d. Evaluate the current voluntary hunter submission of bear teeth and kill information and ways to improve reporting percentages (e.g., incentives, mandatory compliance).

Harvest Guidelines

Issue Statement
Hunting is the largest source of mortality for bear populations where hunting is allowed (Bunnell and Tait 1985, Pelton 2000). Coupled with the relatively low reproductive potential of bears, this makes bear populations especially sensitive to over-exploitation. For that reason, managers use a variety of biological and population trend data to assess the impacts of hunting on bear
populations. In Washington, managers have used sex and age data from harvested bears as an indicator of exploitation levels (Washington Dept. of Fish and Wildlife 1997). The premise of this method is based on the vulnerability of different sex and age classes of black bears (Beecham and Rohlman 1994). If the ages of harvested bears decline and percentage of females in the harvested population increases, then the exploitation level of the bear population is likely increasing. A drawback of this method is that sex and age data alone are not necessarily accurate measures of population status. A supplemental measure of population status is needed to better manage bear populations in Washington.

**Objective 88:**

Provide recreational hunting opportunities while at the same time maintaining a sustainable bear population in each BBMU.

**Strategies:**

a. Provide black bear hunting opportunities in each BBMU, and as opportunities occur focus harvest in areas where public safety, property damage, and pet and livestock depredation are evident.

b. Evaluate the current BBMUs as appropriate data analysis units with regards to percent female harvest and age with emerging management priorities.

c. Evaluate the current voluntary reporting system with emerging management priorities.

d. Develop harvest criteria that incorporate survey and monitoring data.

e. Until more robust harvest criteria are developed, consider liberalizing or restricting bear hunting opportunity in each BBMU as indicated below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Liberalize</th>
<th>Acceptable</th>
<th>Restrict</th>
</tr>
</thead>
<tbody>
<tr>
<td>% Females in harvest</td>
<td>&lt; 35%</td>
<td>35-39%</td>
<td>&gt; 39%</td>
</tr>
<tr>
<td>Median age of harvested females</td>
<td>&gt; 6 years</td>
<td>5-6 years</td>
<td>&lt; 5 years</td>
</tr>
<tr>
<td>Median age of harvested males</td>
<td>&gt; 4 years</td>
<td>2-4 years</td>
<td>&lt; 2 years</td>
</tr>
</tbody>
</table>

*Note: Thresholds outlined in strategy “e” above are currently implemented.*

**Issue Statements**

Impacts to black bear populations and other native wildlife. The harvest guidelines above favor a stable and healthy bear population and are consistent with long-term sustainability. The corresponding bear population should remain at or near current levels and it is unlikely it will result in greater impacts to other wildlife species (i.e., deer and elk) or habitat communities. However, if black bears are determined to be the likely cause of prey population declines or suppression, then consideration of predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3.

Black bear harvest impacts on native species. The public has voiced concern about potential impacts of black bear hunting on grizzly bears. With the prohibition on the use of dogs and bait for recreational hunting of bears, potential impacts to grizzly bears were greatly reduced. Nonetheless, the Department developed an online tutorial to educate black bear hunters on how to identify and distinguish a black bear from a grizzly bear.
Public Safety

Issue Statement

A primary objective of WDFW is to minimize conflict with people and wildlife, including black bears. While eliminating bear conflict with people is impossible, the Department does implement activities to reduce human-bear interactions.

Objective 89:

Minimize negative human-bear interactions so that the “number of negative interactions per capita” is constant or declining over the term of this plan.

Strategies:

a. Implement statewide and/or regional black bear education and outreach programs.

b. Distribute updated educational materials to key entities and locations.

c. Evaluate the efficacy of capture-relocation and hazing of bears involved in conflict for mitigating conflict.

d. Utilize agency kill authority and depredation permits for problem bear incidents.

e. Promote rules, activities, and programs (e.g., fines, bear proof containers) that reduce the likelihood of bears encountering accessible garbage and other attractants.

Black Bear Tree Depredation on Commercial Timberlands

Issue Statement

During the spring, when black bears are emerging from dens, high nutritional value food resources are limited. Bears will often seek sapwood as a preferred food resource because of its high sugar content. Trees with high growth rates, typically found on commercial timberlands, contain the highest sugar content and therefore are the most vulnerable to depredation. Damage to commercial timberlands can, at times, exceed one-third of the trees in a given stand; resulting in economic losses for landowners (Washington Department of Fish and Wildlife 2008).

See Wildlife Conflict chapter for objective and strategies for improving WDFW’s black bear tree damage program.

VIII. LITERATURE CITED


COUGAR (*Puma concolor*)

I. POPULATION STATUS AND TREND

Cougar occur throughout most of the forested regions of Washington State, encompassing approximately 88,000 km$^2$ or 49% of the state (Figure 1). For management purposes, the state is divided into forty-nine population management units (PMUs) (Figure 1, Table 1).

Cougars in Washington can breed at any time of year, although birth pulses have been observed in June through August and the average litter size is 2-3 (Cooley et al. 2009b). Kittens are spotted at birth, but these spots begin to fade at about 12 to 14 weeks and continue to fade as the kitten gets older before disappearing completely in about 18 months. Kittens remain with their mother on average for about 16 months. Because of this parental care, individual female cougars breed every other year. Cougars become sexually mature at about 24 months of age. However, sexually mature cougars seldom breed until they have established a home range.

Except for females with kittens, cougars are solitary the majority of their life, making it difficult to accurately estimate statewide cougar populations. However, based on densities from six long-term research studies in Washington over a 13-year period, the Department has estimated the adult (>24 months of age) cougar population size at 1,800 animals statewide. The total population size, including adults, subadults, (i.e., independent, dispersing animals), and kittens is more difficult to estimate, but is likely around 3,600.

In recent years the importance of cougar behavior (e.g., territoriality and social structure) has been recognized and incorporated into management (Beausoleil et al. 2013, Wielgus et al. 2013, Maletzke 2010). Territory size in Washington averages from 348 km$^2$ for males and 200 km$^2$ for females (Kertson et al. 2013, Maletzke et al. 2014). Territories of male cougars are strongly defended against other males and often overlap the ranges of multiple females. Due to this social behavior, the territories of adult males are often arranged on the landscape like pieces of a puzzle, with relative low overlap. Adult female home ranges display an average overlap of 10–30% (Maletzke et al. 2014). Through this behavioral-based organization, cougar population size is limited by the available habitat. With a greater understanding of this type of social organization, managers now incorporate and consider the impacts of different levels of cougar harvest on population growth as well as social organization.

II. RECREATIONAL OPPORTUNITY

Cougar have been classified as a protected game animal since 1966 (Figure 2) and cougar harvest methods have changed over that time. Prior to 1996, cougar hunting with hounds comprised the
majority of sport hunting. Since 1996, the use of dogs was banned for sport hunting by a voter initiative, except during a limited pilot project granted by the State Legislature between 2004-2010. Since 2010, dogs have not been used to aid in sport hunting, except during periodic management removals to address emerging areas of reoccurring cougar conflict with livestock and pets.

III. DATA COLLECTION

Historically, cougar harvest data were used to evaluate the impact of harvest on long-term sustainability. However, trend analyses from harvest data are only useful when the parameters being monitored are proven indicators of population status, and when the collection methods are constant over time (Caughley 1977). Neither of these two requirements has been satisfied for cougars in Washington using this technique. Since 2000, six cougar research projects have been conducted collaboratively over a 13-year period between WDFW, Washington State University, and University of Washington. The scientific findings from those projects have resulted in numerous publications in peer-reviewed science journals and have been incorporated into how the Department currently manages cougar (Lambert et al 2006, Robinson et al. 2008, Cooley et al. 2009a, Cooley et al. 2009b, White et al. 2010, Kertson et al. 2011, Beausoleil et al. 2013, Kertson et al. 2013, Peebles et al. 2013, Wielgus et al. 2013, Maletzke et al. 2014).

IV. COUGAR MANAGEMENT GOALS

The statewide goals for cougar are:
1. Preserve, protect, perpetuate, and manage cougar and their habitats to ensure healthy, productive populations.
3. Manage cougar for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
4. Manage statewide cougar populations for a sustained yield.
5. Improve our understanding of predator-prey relationships.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Population Management Areas

Issue Statement

Cougar distribution across the landscape varies seasonally; that is, cougar territories are fairly uniformly distributed across most suitable habitats on an annual basis, but in winter cougar use is typically more concentrated around wintering deer and elk populations along valley bottoms. Cougar distribution is also affected by factors such as prey availability and human development. Combining these geographic layers, managers are able to establish cougar population management units (PMUs).

Objective 90:

Evaluate and update cougar PMUs by 2015.

Strategies:

a. Evaluate cougar PMUs based on habitat use, prey availability, and human activities.
b. Compare cougar PMUs to information on genetic population structure.
c. Identify PMUs with emerging management priorities (e.g., cougar-livestock conflict, cougar-ungulate interactions).

Population Objectives

Issue Statement

Wildlife managers are frequently asked to balance the desire for abundant wildlife populations and other equally important objectives. Given the variety of interests in cougars, cougars are managed in some areas of Washington to minimize cougar-human conflicts, while at the same time maintaining long-term sustainable populations. Previously, harvest levels were increased in areas with high human-cougar conflict in an effort to reduce these conflicts. However, recent analysis comparing number of complaints and previous year’s harvest levels suggests that increased harvest up to 24% of the estimated population had no effect on reducing the overall number of cougar-human conflicts (Peebles et al. 2013).

Objective 91:

Manage for a stable cougar population in each PMU (see exceptions).

Strategies:

a. Implement a harvest guideline that corresponds to a stable cougar population at the PMU level.
b. Implement a harvest guideline for a maximum harvest while at the same time providing an overall stable growth rate plus an age structure with adequate adult males for social stability.
c. Modify harvest strategies and objectives consistent with management objectives and new scientific information.
d. Implement education and outreach on living with carnivores.
Impacts

Prey impacts on cougar. It is unlikely that cougar populations will be negatively impacted by management strategies for deer, elk, and other prey species. The current population levels for deer and elk populations are compatible with the cougar population objectives for each PMU.

Cougar impacts on prey. The cougar population objectives have the potential to impact some prey species. Because actual cougar mortality rates vary, local cougar populations may also fluctuate, which could impact predation rates (increase or decrease). However, if there is a change in the predation rate, it’s uncertain whether the increase would be additive (additional prey killed by cougars causing total prey mortality to increase) or compensatory (as predation by cougars increases, another prey mortality source decreases, so total mortality remains constant), or whether the net result would be large enough to detect. While there is evidence that cougar populations can impact a prey population’s growth rate, this is typically associated with a small, isolated prey population, or a prey population that suffers from other environmental stressors.

Some hunters voice concerns about the impacts of cougar predation on deer and elk herds. The primary prey species for cougars are deer and elk, and in some cases cougar populations can influence the growth rates of deer and elk populations. Reducing cougar abundance temporarily in a specific area is a management action that has been used to address deer or elk populations. Recognizing the role of cougars in the ecosystem and public attitudes, WDFW manages for stable cougar populations in most management units. However, if cougars are determined to be the likely cause of prey population declines or suppression, then consideration of predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3.

Population Status

Issue Statement

Since 2000, six cougar research projects have been conducted collaboratively with WDFW, Washington State University, and University of Washington. The scientific findings from those projects have resulted in numerous publications in peer-reviewed science journals and have been incorporated into how the Department currently manages cougar. A key contribution of those findings was better understanding on the impacts of harvest on population growth as well as on the social structure and territoriality of cougars. This research culminated in a recommended maximum harvest rate (12-16%) for cougars (excluding dependent young) that maintains long-term sustainable populations.

Objective 92:

Evaluate the current harvest strategy by 2017 to determine if the harvest guideline, season structure, and lethal actions associated with conflicts achieve stable populations based on estimated growth rates and maintain adult male social structure.

Strategies:

a. Estimate the impacts of harvest on cougar populations through research and modeling.

b. Evaluate the demographics and spatial organization of cougars living near human populations.
Harvest Guidelines

Issue Statement

Cougars are managed for long-term sustainability, while at the same time maximizing recreational opportunities, and minimizing conflict with people. In terms of hunting opportunity, cougars are managed at the maximum harvest level without substantial risk of causing a measurable population decline or break down in adult male territoriality (see exceptions). To achieve this, cougar are managed geographically in PMUs with fall seasons, where specific PMUs close to hunting once 12-16% harvest levels are reached, which is the maximum harvest to achieve the population objective.

Objective 93:

Provide recreational harvest opportunity at a 12-16% annual harvest rate of the cougar population, excluding kittens in each PMU (see exceptions).

Strategies:

a. Establish recreational hunting seasons that target the harvest guideline for each PMU.

b. Evaluate the cougar harvest structure and harvest guidelines every three-years, corresponding to the three year hunting season package.

<table>
<thead>
<tr>
<th>PMU (Hunt Area)</th>
<th>Estimated population size (excluding kittens)</th>
<th>Harvest Guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td>GMU 101</td>
<td>57</td>
<td>7-9</td>
</tr>
<tr>
<td>GMU 105</td>
<td>15</td>
<td>2</td>
</tr>
<tr>
<td>GMU 108, 111</td>
<td>38</td>
<td>5-6</td>
</tr>
<tr>
<td>GMU 113</td>
<td>37</td>
<td>4-6</td>
</tr>
<tr>
<td>GMU 117</td>
<td>48</td>
<td>6-8</td>
</tr>
<tr>
<td>GMU 121</td>
<td>38</td>
<td>5-6</td>
</tr>
<tr>
<td>GMUs 124, 127, 130</td>
<td>57</td>
<td>7-9</td>
</tr>
<tr>
<td>GMUs 133, 136, 139, 142, 248, 254, 260, 262, 266, 269, 272, 278, 284, 290, 330, 334, 371, 372, 373, 379, 381</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>GMUs 145, 166, 175, 178</td>
<td>27</td>
<td>3-4</td>
</tr>
<tr>
<td>GMU's 149, 154, 157, 162, 163</td>
<td>35</td>
<td>4-6</td>
</tr>
<tr>
<td>GMUs 169, 172, 181, 186</td>
<td>24</td>
<td>3-4</td>
</tr>
<tr>
<td>GMU 203</td>
<td>35</td>
<td>4-6</td>
</tr>
<tr>
<td>GMU 204</td>
<td>50</td>
<td>6-8</td>
</tr>
<tr>
<td>GMUs 209, 215</td>
<td>29</td>
<td>4-5</td>
</tr>
<tr>
<td>GMUs 218, 231</td>
<td>35</td>
<td>4-6</td>
</tr>
<tr>
<td>GMUs 224</td>
<td>16</td>
<td>2-3</td>
</tr>
<tr>
<td>GMUs 233, 239</td>
<td>26</td>
<td>3-4</td>
</tr>
<tr>
<td>GMUs 242, 243</td>
<td>35</td>
<td>4-6</td>
</tr>
<tr>
<td>GMUs 244, 246, 247</td>
<td>39</td>
<td>5-6</td>
</tr>
<tr>
<td>GMUs 245, 250</td>
<td>40</td>
<td>5-6</td>
</tr>
<tr>
<td>GMUs 249, 251</td>
<td>40</td>
<td>5-6</td>
</tr>
</tbody>
</table>
Table 1. Population and harvest summaries by current PMUs during 2012-2013 and 2013-2014 seasons, Washington. (Continued)

<table>
<thead>
<tr>
<th>PMU (Hunt Area)</th>
<th>Estimated population size (excluding kittens)</th>
<th>Harvest Guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td>GMUs 328, 329, 335</td>
<td>50</td>
<td>6-8</td>
</tr>
<tr>
<td>GMUs 336, 340, 342, 346</td>
<td>43</td>
<td>5-7</td>
</tr>
<tr>
<td>GMUs 352, 356, 360, 364, 368</td>
<td>44</td>
<td>5-7</td>
</tr>
<tr>
<td>GMUs 382, 388</td>
<td>24</td>
<td>3-4</td>
</tr>
<tr>
<td>GMU 407</td>
<td>43</td>
<td>none</td>
</tr>
<tr>
<td>GMUs 418, 426, 437</td>
<td>91</td>
<td>11-15</td>
</tr>
<tr>
<td>GMUs 448, 450</td>
<td>78</td>
<td>9-13</td>
</tr>
<tr>
<td>GMU 454</td>
<td>14</td>
<td>none</td>
</tr>
<tr>
<td>GMU 460</td>
<td>41</td>
<td>5-7</td>
</tr>
<tr>
<td>GMUs 466, 485, 490</td>
<td>20</td>
<td>2-3</td>
</tr>
<tr>
<td>GMUs 501, 504, 506, 530</td>
<td>61</td>
<td>7-10</td>
</tr>
<tr>
<td>GMUs 503, 505, 520, 550</td>
<td>49</td>
<td>6-8</td>
</tr>
<tr>
<td>GMUs 510, 513</td>
<td>24</td>
<td>3-4</td>
</tr>
<tr>
<td>GMU 516</td>
<td>29</td>
<td>3-5</td>
</tr>
<tr>
<td>GMUs 522, 524, 554, 556</td>
<td>24</td>
<td>3-4</td>
</tr>
<tr>
<td>GMU 560</td>
<td>38</td>
<td>5-6</td>
</tr>
<tr>
<td>GMU 564, 568</td>
<td>24</td>
<td>3-4</td>
</tr>
<tr>
<td>GMU 572</td>
<td>24</td>
<td>3-4</td>
</tr>
<tr>
<td>GMUs 574, 578</td>
<td>29</td>
<td>3-5</td>
</tr>
<tr>
<td>GMUs 601, 602, 603, 612</td>
<td>42</td>
<td>5-7</td>
</tr>
<tr>
<td>GMUs 607, 615</td>
<td>29</td>
<td>4-5</td>
</tr>
<tr>
<td>GMUs 618, 636, 638</td>
<td>33</td>
<td>4-5</td>
</tr>
<tr>
<td>GMUs 621, 624, 627, 633</td>
<td>62</td>
<td>none</td>
</tr>
<tr>
<td>GMUs 642, 648, 651</td>
<td>51</td>
<td>6-8</td>
</tr>
<tr>
<td>GMUs 652, 666</td>
<td>23</td>
<td>none</td>
</tr>
<tr>
<td>GMUs 653, 654</td>
<td>36</td>
<td>4-6</td>
</tr>
<tr>
<td>GMUs 658, 660, 663, 672, 673, 681, 684, 699</td>
<td>76</td>
<td>9-12</td>
</tr>
<tr>
<td>GMU 667</td>
<td>26</td>
<td>3-4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,849</strong></td>
<td><strong>205-277</strong></td>
</tr>
</tbody>
</table>

**Issue Statement**

To properly manage cougar populations for sustainability, prevent harvest in excess of guidelines, and minimize cougar-human conflict, it’s imperative to know how many animals are lethally removed each year, the kill location, and biological data related to the animal (e.g., age, sex, weight).

**Objective 94:**

Account for all human related cougar mortalities every year.

**Strategies:**

a. Continue with mandatory carcass check that has been conducted for decades of all harvested cougar and provide a summary in the harvest report each year.

b. Continue to mark all harvested cougar with a unique pelt identification tag.

c. Continue to collect biological information from all harvested cougar.

d. Establish mandatory online reporting of hunter effort consistent with other big game species.
Public Safety

Issue Statement

A primary objective of WDFW is to protect people from dangerous wildlife, including cougars. While guaranteeing that cougars will never negatively impact people is impossible, the Department does implement activities that attempt to minimize human-cougar interactions in areas with a demonstrated history of conflict (Conover 2001).

Objective 95:

Minimize negative human-cougar interactions so that the “number of interactions per capita” is constant or declining from 2007 levels.

Strategies:

a. Distribute educational materials to key entities and locations.

b. Conduct targeted cougar removals in GMUs with human-cougar interactions.

c. Implement actions identified in agency policy for problem cougar incidents.

d. Law Enforcement will maintain dangerous wildlife reporting per RCW 77.12.885.

Research

Issue Statement

Cougars and people live in close proximity to each other in several areas of the state, which can result in conflict. Understanding cougar dynamics in these environments is critical, as the potential for conflict will likely increase as human populations continue to increase and expand into rural environments (Spencer et al. 2001, Kertson et al. 2011, Kertson et al. 2013).

Objective 96:

By 2020, develop a report that describes the demographic and behavioral characteristics of cougars in suburban environments that compares and contrasts those involved in conflict to those not involved in conflict.

Strategies:

a. Develop publications documenting the results of completed research.

b. Utilize research findings to modify policy and management as appropriate.

c. Update educational materials to incorporate research findings.

d. Investigate the role of corridor design for facilitating or discouraging cougar movements.

e. Determine the relationship between the level of human-cougar conflict in a stable versus unsustainable cougar population.

f. Evaluate the propensity of specific sex and age class of cougar to be involved in human-cougar conflict.

VI. LITERATURE CITED


I. POPULATION STATUS AND TREND

Washington provides wintering habitat for approximately 750,000 ducks, 130,000 geese, and 11,500 swans annually (see Figure 1). In addition, the state provides habitat for approximately 150,000 breeding ducks and 50,000 breeding geese each spring and summer. The Pacific Flyway waterfowl population contains almost six million ducks, geese, and swans, and many of these birds pass through the state during fall and spring.

Duck management programs are complex, due to the wide variety of species that occur here. Ducks are classified in the subfamily *Anatinae*, and the 27 species occurring in Washington belong to 4 tribes and 12 genera. The most common duck species in the winter, in the harvest, and during breeding season is the mallard.

Management of Washington’s geese and swans is also complex. Geese and swans are classified in the subfamily *Anserinae*, and Washington’s 8 species belong to 2 tribes and 4 genera. Canada geese found in Washington include 7 subspecies. The most common goose during the breeding season and in the harvest is the western Canada goose. The most common swan using Washington wintering habitats is the tundra swan.

II: RECREATIONAL OPPORTUNITY

Waterfowl are hunted from the early September goose season through special damage hunts in March. Seasons are based on frameworks established by U.S. Fish and Wildlife Service (USFWS), in conjunction with the Pacific Flyway Council (composed of wildlife agencies from the 11 western states). Approximately 40,000 hunters purchase migratory bird permits each year, and annually harvest over 400,000 ducks and 65,000 geese in Washington, providing over 300,000 days of recreation annually. Washington ranks second among the 11 Pacific Flyway states and usually ranks in the top ten states in the U.S. based on waterfowl harvested and number of hunters.
III. DATA COLLECTION

The Department conducts a variety of activities to estimate the size of the waterfowl population, production, migration patterns, and harvest. Breeding surveys are completed in April and May to measure status of the breeding population; waterfowl are marked during molting periods in the summer to document movements; duck production surveys are conducted in July to measure recruitment; migration counts are completed from October-December to track seasonal trends; and winter index counts are completed in January to document population status. Duck and goose hunter numbers and harvest are estimated using a mail questionnaire, special card survey, and mandatory harvest reports for some species (see Figure 2).

IV. MANAGEMENT

Statewide management of Washington waterfowl is linked to numerous long-term interagency and international management programs. Although the USFWS has nationwide management authority for migratory birds, effective management of these resources depends on established cooperative state programs developed through the Pacific Flyway Council and North American Waterfowl Management Plan (NAWMP) Joint Ventures. Goals and objectives described in this plan follow interagency and other cooperative planning efforts. Strategies identified in this plan will guide work plan activities and priorities, and must be accomplished to meet the goals and objectives.

V. WATERFOWL MANAGEMENT GOALS

The statewide goals for waterfowl are:

1. Manage statewide populations of waterfowl for a sustained yield consistent with Pacific Flyway management goals.
2. Manage waterfowl for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Preserve, protect, perpetuate, and manage waterfowl and their habitats to ensure healthy, productive populations.
VI. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Habitat Management

Issue Statement
Wetlands and other waterfowl habitats are being lost throughout Washington due to development, natural succession, invasive plant species, and conversion to other uses.

Objective 97:
Provide funding through state migratory bird stamp/print revenues and outside grants to conserve/enhance 1,000 acres of new habitat annually for all migratory birds.

Strategies:

a. Determine habitat conservation and enhancement needs considering habitat trends, Joint Venture plans, Pacific Flyway plans, literature, focused research projects, and regional expertise.
b. Solicit project proposals from department staff and external organizations.
c. Utilize an evaluation team from a statewide cross-section of department experts to rank projects.
d. Present and solicit input on project proposals from the Waterfowl Advisory Group (WAG).
e. Provide emphasis on projects to increase waterfowl recruitment in wintering habitat and access in western Washington.
f. When allocating migratory bird stamp funds, consider fund allocation goals presented to the Legislature when the program was established: habitat acquisition - 48%; enhancement of wildlife areas - 25%; project administration - 18%; and food plots on private lands - 9%.
g. Develop a stamp/print program expenditure plan before the start of each new biennium.
h. Monitor effectiveness of projects through focused evaluation of projects before and after implementation.
i. Participate in and support organizations designed to deliver habitat improvements via partnerships (e.g., Pacific Coast Joint Venture, Intermountain West Joint Venture, Ducks Unlimited).
j. Seek outside funding sources to leverage state migratory bird stamp revenues, through habitat improvement grants (e.g., National Coastal Wetlands Conservation Grants, North American Wetlands Conservation Act, RCO Washington Wildlife and Recreation Program).

Population Management

Issue Statement
Documentation of population size, movements, and mortality factors is difficult due to the highly migratory nature of waterfowl species.

Objective 98:
Manage waterfowl populations consistent with population objectives outlined in Table 1, developed considering NAWMP, Pacific Flyway Council, and Joint Venture plans.
Table 1. Waterfowl population objectives (3-year averages, unless noted).

<table>
<thead>
<tr>
<th>Species / subsp. / pop.</th>
<th>Area</th>
<th>Current Index (2014)</th>
<th>Population Objective</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mallard</td>
<td>N. America</td>
<td>10.9 million (annual)</td>
<td>7.7 million (annual)</td>
<td>breeding index</td>
</tr>
<tr>
<td>Pintail</td>
<td>N. America</td>
<td>3.2 million (annual)</td>
<td>5.7 million (annual)</td>
<td>breeding index</td>
</tr>
<tr>
<td>Western Canada goose</td>
<td>W. Wash.</td>
<td>8,140 geese</td>
<td>N/A</td>
<td>goose index</td>
</tr>
<tr>
<td>Western Canada goose</td>
<td>E. Wash.</td>
<td>2,177</td>
<td>2,000</td>
<td>nest index</td>
</tr>
<tr>
<td>Cackling goose</td>
<td>Flyway</td>
<td>265,281</td>
<td>250,000</td>
<td>breeding index</td>
</tr>
<tr>
<td>Dusky Canada goose</td>
<td>Flyway</td>
<td>13,678</td>
<td>10,000-20,000</td>
<td>breeding index</td>
</tr>
<tr>
<td>Wrangel Island snow goose</td>
<td>Skagit/Fraser</td>
<td>69,009</td>
<td>50,000-70,000</td>
<td>winter index</td>
</tr>
<tr>
<td>Wrangel Island snow goose</td>
<td>Flyway</td>
<td>145,833</td>
<td>120,000</td>
<td>spring index</td>
</tr>
<tr>
<td>Black brant</td>
<td>Flyway</td>
<td>160,948</td>
<td>162,000</td>
<td>winter index</td>
</tr>
<tr>
<td>Black brant</td>
<td>Wash. Bays</td>
<td>17,147</td>
<td>25,000</td>
<td>winter index</td>
</tr>
<tr>
<td>White-fronted goose</td>
<td>Flyway</td>
<td>616,124</td>
<td>300,000</td>
<td>breeding index</td>
</tr>
<tr>
<td>Tundra swan</td>
<td>Flyway</td>
<td>86,911</td>
<td>60,000</td>
<td>winter index</td>
</tr>
<tr>
<td>Trumpeter swan</td>
<td>Flyway</td>
<td>26,790 (2010)</td>
<td>25,000</td>
<td>breeding index</td>
</tr>
</tbody>
</table>

**Strategies:**

a. Monitor annual status and trends of waterfowl populations through coordinated surveys with other agencies, including USFWS, flyway states, and Puget Sound Assessment and Monitoring Program (PSAMP) including:
   1. Midwinter Waterfowl Survey
   2. Canada goose nest surveys
   3. Duck breeding population surveys
   4. Periodic fall waterfowl surveys
   5. Age-ratio surveys
b. Work with other agencies to improve estimates of waterfowl in other areas of the flyway important to Washington.
c. Provide ongoing training for new observers in waterfowl population estimation techniques.
d. Provide regular training and necessary resources for aerial survey crews to improve safety.
e. Evaluate and revise surveys to optimize accuracy and precision, including review of current literature and peer review.
f. Determine detection rates for species composition and abundance parameters related to aerial surveys, for refinement of population estimates.

**Objective 99:**

Document distribution, movements, and survival in accordance with flyway management goals by achieving annual banding objectives.

**Strategies:**

a. Band a minimum of 750 mallards each year to provide survival estimates for inclusion in western mallard management model.
b. Participate in goose marking and observation programs to estimate distribution, survival, abundance, and derivation of harvest.
c. Conduct focused banding emphasis on select species (e.g., western Canada geese-ongoing, lesser Canada geese–2014-16, scoters–2014-16).
**Objective 100:**
Monitor mortality due to disease and contaminants each year and take corrective action as indicated.

**Strategies:**

a. Identify sources of disease and contaminants associated with mortality events (e.g., lead shot mortalities of swans in north Puget Sound).

b. In cooperation with other management agencies, (e.g., National Wildlife Health Research Center, USFWS) take corrective action to minimize exposure to disease and contaminant sources.

**Recreation Management**

**Issue Statement**

Federal harvest management strategies are not specific to Washington duck populations, although states are given more flexibility in developing goose harvest management strategies.

**Objective 101:**
Obtain accurate and precise estimates of waterfowl harvest, number of hunters, and effort, accurate to ±10% at the 90% CI.

**Strategies:**

a. Participate in federal Harvest Information Program (HIP) for migratory birds.

b. Provide supplemental estimates to determine regional differences in harvest:
   1. Small game hunter questionnaire
   2. Daily waterfowl card survey
   3. Mandatory harvest reports for waterfowl species of management concern: (brant, snow goose, SW Canada goose, and seaduck)
   4. Brant color composition

**Objective 102:**
Continue current policies to maximize duck hunting recreation consistent with USFWS Adaptive Harvest Management (AHM) regulation packages, considering duck availability during fall and winter.

**Strategies:**

a. Establish regulations to maximize effective season days and bag limits, locating most season days later in the framework period.

b. When federal and flyway harvest strategies prescribe shortened seasons for canvasback, pintail, or scaup, schedule season days as follows:
   1. Scaup: All season days as late as possible
   2. Canvasback and Pintail: Seven (7) days starting with the general duck season opener, remainder as late as possible
Table 2. AHM Regulation Packages and Washington Season Timing.

<table>
<thead>
<tr>
<th>Regulation package</th>
<th>EASTERN WASHINGTON</th>
<th>WESTERN WASHINGTON</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Days</td>
<td>Limit total/mall /♀ mall</td>
</tr>
<tr>
<td>Moderate</td>
<td>93</td>
<td>7/5/2</td>
</tr>
<tr>
<td>Restrictive</td>
<td>67</td>
<td>4/3/1</td>
</tr>
</tbody>
</table>

* USFWS rules on duck season timing:
  - Washington zones (2) – E. Washington and W. Washington
  - Season dates must be the same within each zone
  - Seasons may only be split into 2 segments
  - Youth days in addition to above days, except for liberal package


c. Continue to assist in refining USFWS duck harvest management programs to reflect regional population differences (e.g., western mallards).

d. Maintain state harvest restrictions, in addition to federal frameworks, on waterfowl species of management concern in Washington (e.g., sea ducks, snow geese, brant), depending on harvest rates and population status.

**Objective 103:**

Maximize goose-hunting recreation consistent with Pacific Flyway Council plans, considering goose availability during fall and winter.

**Strategies:**

a. Continue to establish regulations to follow flyway and state harvest thresholds (see Table 1 for current population indexes).

b. Utilize recreational harvest as the primary method to address depredating/nuisance goose populations above management objectives (e.g., implement Pacific Flyway SW Wash./NW Oregon Goose Depredation Control Plan).

Table 3. Flyway and State Harvest Thresholds (3-yr. averages unless noted).

<table>
<thead>
<tr>
<th>Species</th>
<th>Area</th>
<th>Flyway Harvest Thresholds</th>
<th>Additional WDFW Harvest Thresholds</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Western Canada goose</td>
<td>E. Wash.</td>
<td>Restriction level: 1,300</td>
<td>&lt;1,300: reduce days/limit</td>
<td>nest index</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Liberalization level: 2,000</td>
<td>&lt;2,000: eliminate Sept. season</td>
<td></td>
</tr>
</tbody>
</table>
Table 3. Flyway and State Harvest Thresholds (3-yr. averages unless noted) (Continued)

<table>
<thead>
<tr>
<th>Species</th>
<th>Area</th>
<th>Flyway Harvest Thresholds</th>
<th>Additional WDFW Harvest Thresholds</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dusky Canada goose</td>
<td>Flyway</td>
<td>Closure level: 5,000&lt;br&gt;Restrict level 1: 5,000-10,000&lt;br&gt;Restrict level 2: 10,000-20,000&lt;br&gt;Liberalization level: 20,000</td>
<td>None</td>
<td>breed. pop. index</td>
</tr>
<tr>
<td>Cackling Canada goose</td>
<td>Flyway</td>
<td>Closure level: 80,000&lt;br&gt;Reopening level: 110,000</td>
<td>None</td>
<td>projected fall index</td>
</tr>
<tr>
<td>Wrangel Island snow goose</td>
<td>Flyway</td>
<td>Closure level: 60,000&lt;br&gt;Restriction level: 120,000&lt;br&gt;Liberalization level: 160,000</td>
<td>None</td>
<td>spring pop. index</td>
</tr>
<tr>
<td></td>
<td>Skagit-Fraser</td>
<td>Closure level: 30,000&lt;br&gt;Restriction level: 50,000&lt;br&gt;Liberalization level: 70,000</td>
<td>S-F &lt;50K or Flyway &lt;120K: season ends 1st wk. Jan.&lt;br&gt;S-F&gt;70K: season extends past late Jan. and/or increased bag limit&lt;br&gt;</td>
<td>winter index</td>
</tr>
<tr>
<td>Brant</td>
<td>Flyway</td>
<td>Closure level: &lt;100,000&lt;br&gt;Very Restrictive: 100-120,000&lt;br&gt;Restrictive: 120-145,000&lt;br&gt;Moderate: &gt;145,000</td>
<td>None</td>
<td>winter index</td>
</tr>
<tr>
<td></td>
<td>Skagit</td>
<td>None</td>
<td>Closure level: 6,000 (annual)</td>
<td>winter index</td>
</tr>
<tr>
<td></td>
<td>Others</td>
<td>None</td>
<td>Closure level: 1,000</td>
<td>winter index</td>
</tr>
<tr>
<td>White-fronted goose</td>
<td>Flyway</td>
<td>Closure level: 80,000&lt;br&gt;Reopening level: 110,000</td>
<td>None</td>
<td>projected fall index</td>
</tr>
<tr>
<td>Scoter</td>
<td>W. Wash</td>
<td>None</td>
<td>Closure level: 45,000&lt;br&gt;Restrict level: 45,000-67,500&lt;br&gt;Mod level: 67,500-135,000&lt;br&gt;Liberal level: &gt;135,000</td>
<td>winter index</td>
</tr>
</tbody>
</table>

**Objective 104:**

Maintain hunter numbers between 35,000-45,000 and recreational use days between 300,000-500,000, consistent with population objectives.

**Strategies:**

a. Periodically survey hunter opinion to determine and recommend optimal season structures within biological constraints to reduce the percentage of hunters who are very dissatisfied with waterfowl hunting to less than 15%.

b. Work with USFWS to simplify hunting regulations and minimize annual hunting regulation changes.

c. To reduce confusion, minimize closed periods within seasons, maximize overlap between duck and goose seasons, and reduce the number of zones with different season structures.

d. Provide special opportunity for youth by providing special recreational opportunities separate from regular seasons (e.g., youth hunts two weeks before regular season opener).
e. Modify regulations to reduce crowding and increase hunt quality on wildlife areas (e.g., shell limits, regulated access, reserved hunts, established blind sites, limited open days), without reducing total use days.

f. Work with local governments to maintain opportunity in traditional hunting areas, minimizing or finding alternatives to no shooting zones.

g. Maintain diversity of recreational hunting and viewing opportunities.

**Information and Education Goal**

**Issue Statement**

Members of the general public and recreational users are sometimes uninformed about management issues and waterfowl hunting opportunities.

**Objective 105:**

Generate at least five information and education products each year to improve transfer of information to public.

**Strategies:**

a. Increase public awareness of management issues and waterfowl hunting opportunities through brochures, news releases, district hunting season prospects, internet (e.g., GoHunt), and pamphlets.

b. Update web site information regarding migratory bird stamp projects and provide web page links to other organizations (every two years).

c. Continue to discuss waterfowl population management at Waterfowl Advisory Group meetings, public meetings, and select sports group forums.

**VII. LITERATURE CITED**


Pacific Coast and Intermountain West Joint Venture Management Plans, USFWS, Portland, OR.

MOURNING DOVE, BAND-TAILED PIGEON, COOT, AND SNIPE (OTHER MIGRATORY GAME BIRDS)

I. POPULATION STATUS AND TREND

Washington provides habitat for a variety of migratory game birds other than waterfowl. This includes mourning doves, band-tailed pigeons, coots, and snipe. Mourning doves and band-tailed pigeons are monitored by cooperative breeding surveys in Washington, which provide indices but not estimates of actual abundance (see Figure 1). Coots and snipe population trends are monitored by U.S. Fish and Wildlife Service (USFWS) standardized surveys on breeding areas.

Figure 1. WA band-tailed pigeon survey information.

II. RECREATION OPPORTUNITY

Mourning doves, hunted during a September season, provide late summer recreational opportunity for bird hunters. Seasons are based on frameworks established by USFWS, in conjunction with the Pacific Flyway Council (composed of wildlife agencies from the 11 western states). Approximately 4,000 hunters harvest 50,000 doves annually in Washington.

III. DATA COLLECTION

The Department maintains several surveys to estimate the size of dove and band-tailed pigeon populations. The federal Harvest Information Program (HIP) survey and flyway banding programs are currently used to monitor trends in dove populations, and band-tailed pigeon mineral sites surveys are conducted in July. Winter index counts for coots are completed with waterfowl surveys in January, in cooperation with USFWS. Harvest of these species is monitored by a variety of state and USFWS questionnaire surveys.
IV. MOURNING DOVE, BAND-TAILED PIGEON; COOT, AND SNIPE MANAGEMENT GOALS

This section describes the statewide management direction for mourning doves, band-tailed pigeons, coot, and snipe. Management of these species in Washington is accomplished through the Waterfowl Section of WDFW. Although the U.S. Fish and Wildlife Service (USFWS) has nationwide management authority for migratory birds, effective management of these resources depends on established cooperative programs developed through the Pacific Flyway Council. Goals and objectives described in this plan follow interagency and other cooperative planning efforts. Strategies identified in this plan will guide work plan activities and priorities, and must be accomplished to meet the goals and objectives.

The statewide goals for mourning doves, band-tailed pigeons, coots, and snipe are:

1. Manage statewide populations of mourning doves, band-tailed pigeons, coots, and snipe for a sustained yield consistent with Pacific Flyway management goals.
2. Manage mourning doves, band-tailed pigeons, coots, and snipe for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Preserve, protect, perpetuate, and manage mourning doves, band-tailed pigeons, coots, and snipe and their habitats to ensure healthy, productive populations.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Habitat Management

Issue Statement
Habitats for mourning doves, band-tailed pigeons, coots, and snipe are being lost throughout Washington due to development and conversion to other uses.

Objective 106:
Quantify habitat loss by developing habitat maps and management guidelines. These maps and guidelines should be posted on the agency web site by 2016.

Strategies:

a. Provide resource information to other agencies and organizations to influence land use decisions (e.g., WDFW Priority Habitats and Species [PHS] management guidelines for band-tailed pigeons).
b. In cooperation with other agencies, track critical habitat status and trends (e.g., mineral sites, freshwater wetlands).

Objective 107:
Provide funding through state migratory bird stamp/print revenues to conserve/enhance 50 acres of habitat annually for doves, pigeons, coots, and snipe.

Strategies:

a. Determine habitat conservation and enhancement needs considering habitat trends, Joint Venture plans, literature, and regional expertise.
b. Solicit stamp/print project proposals from regional staff and external organizations.

c. Utilize an evaluation team from a statewide cross-section of department experts to rank projects.

d. Develop a stamp/print program expenditure plan before the start of each new biennium.

e. Monitor effectiveness of projects through focused evaluation projects before and after implementation.

**Population Management**

**Issue Statement**

Documentation of population size, movements, and mortality factors is difficult due to the highly migratory nature of dove, band-tailed pigeon, coot, and snipe species.

**Objective 108:**

Conduct annual surveys and participate in studies to monitor whether Pacific Flyway Council population objectives are being met for mourning doves and band-tailed pigeons.

**Strategies:**

a. Participate in the Pacific Flyway dove-banding project by marking a minimum of 700 doves each year to provide survival and population estimates.

b. Monitor annual status and trends of band-tailed pigeons through coordinated breeding ground surveys with other agencies, including USFWS and flyway states.

c. Monitor annual status and trends of coots through the midwinter inventory, coordinated with other agencies including USFWS and flyway states.

d. Provide training aids for new survey observers and banders.

**Recreation Management**

**Issue Statement**

Management of limited populations requires refined harvest estimates.

**Objective 109:**

Obtain accurate and precise estimates of statewide harvest, number of hunters, and effort, accurate to ±10% at the 90% CI.

**Strategies:**

a. Participate in federal Harvest Information Program (HIP) for migratory birds, including new focus on providing estimates for lightly harvested species (e.g., snipe).

b. Provide supplemental measures to refine harvest estimates (e.g., small game harvest questionnaire, band-tailed pigeon harvest report).

**VI. LITERATURE CITED**

Pacific Flyway Council, Management Plans for Band-tailed Pigeons and Mourning Doves, USFWS, Portland, OR.
WILD TURKEY (Meleagris gallopavo)

I. POPULATION STATUS AND TRENDS

Efforts to introduce wild turkey, which are not native to Washington, occurred as early as 1913. However, these early release efforts (1913–1959) did not result in established populations. In 1960, 12 wild-trapped Merriam’s turkeys from New Mexico were released in Klickitat County. This release resulted in establishment of Washington’s largest, most stable turkey population from 1960 through 1990. In addition, 15 Merriam’s turkeys were released in 1961 in the Rice area of Stevens County and a population became established. From the mid-1960s through the early 1970s, turkeys were released in several Washington counties, including Okanogan, Chelan, Whitman, Pend Oreille, Kittitas, Ferry, Spokane, Clallam, Thurston, San Juan, and Lewis. Many of these releases did not result in established populations.

From 1984 through 2003, major transplant projects were undertaken to establish wild turkey populations in eastern and southwestern Washington. Wild turkeys trapped in Texas, South Dakota, Missouri, and Pennsylvania were brought into the state and released in suitable habitats in eastern and southwestern Washington. By the early 1990s, wild turkey populations in eastern Washington had increased to the point that WDFW began to transplant Washington birds into other suitable habitats within several eastern Washington counties. Western Washington wild turkey populations also received additional augmentation in the 1990s when several hundred wild-trapped birds from Iowa were released in Thurston, Lewis, Cowlitz, and Grays Harbor counties.

According to harvest trend information, most turkey populations in Washington are increasing with Stevens County having the highest population density. Other northeastern and southeastern Washington counties also have substantial turkey populations. Populations in central Washington counties also appear to have expanded but not as rapidly as in other parts of eastern Washington. Wild turkey populations in western Washington have not experienced the same level of expansion as eastern Washington; however, there are areas in Thurston, Cowlitz, Mason, and Grays Harbor counties that support huntable populations of the eastern sub-species of wild turkey.

II. RECREATIONAL OPPORTUNITY

Hunting seasons for wild turkeys have expanded from a 2-day fall season in 1965 to the current season structure that includes: a 47-day spring season statewide, 21-day early fall and 26-day late fall either sex general seasons in WDFW Region 1, and fall permit-only seasons in north central Washington and the Columbia River Gorge area. The addition of seasons occurred over time in response to expanding populations that could support additional harvest and address conflicts with agricultural and other landowners.

Before turkey augmentation activity in the late 1980s, hunter numbers fell to a low of 428 (1987) and turkey harvests averaged 65 birds per year (1983-1987). Statewide spring harvest, which is the best long-term indicator of population, has been on an increasing trend since 1996 (Figure 1) but did drop in 2012. These estimates suggest that the extremely fast growth in Washington’s turkey population ended around 2002. Hunter interest peaked between 2002 and 2009 with an average of
over 15,000 hunters, but hunter numbers have since declined to 11,700 hunters during spring seasons.

In 2006, the State Legislature changed the small game hunting laws to require turkey hunters to purchase their first turkey tag, which previously had been included with the purchase of a small game license from 1999 through 2005. The legislation changed the price of all turkey tags to $14 and dedicated 1/3 of the revenue to turkey management, 1/3 to upland bird management, and 1/3 to the Wildlife Fund in general. This revenue has helped the Department provide more focus on turkey and upland game bird management.

A Wild Turkey Management Plan that was developed through the Washington State Environmental Policy Act (SEPA) process, which included a 30-day public review and comment period, was completed in 2005. The Upland Game Advisory Committee and the Fish and Wildlife Commission reviewed the plan before adoption by the Director of the Department of Fish and Wildlife. Detailed historical and biological information and data are included in the plan, along with specific goals, objectives, and strategies for wild turkey management in Washington. The plan has not been updated but is still viewed as giving current direction to management of turkeys in the state.

III. DATA COLLECTION

The primary data collected to monitor wild turkey populations has been estimated harvest and hunter effort. Some limited radio tracking was done in Pend Oreille, Yakima, Chelan, and western Washington counties to help evaluate survival and production of recently released birds. WDFW staff began implementing a monitoring protocol in northeast Washington that uses wintertime
driving route turkey counts as a harvest independent indicator of population status and trend. Winter surveys of turkeys also occur in parts of central Washington through counts at winter concentration areas. Future efforts to collect these types of monitoring data are described in the population management section below.

IV. MANAGEMENT GOALS

The statewide goals for wild turkeys are:

1. Preserve, protect, perpetuate, and manage wild turkeys and their habitats to ensure healthy, productive populations.
2. Manage wild turkeys for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, wildlife viewing cultural and ceremonial uses by Native Americans, and photography.
3. Manage statewide wild turkey populations for a sustained harvest.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Population Management

Issue Statement

Turkey populations in some areas of eastern Washington have expanded substantially. WDFW continues to receive damage complaints from residents in some of these areas. A response matrix to use in landowner/turkey conflict situations was included in the Wild Turkey Management Plan that was completed in 2005.

Objective 110:

Monitor conflicts each year and implement effective conflict management strategies to help resolve issues as they arise. Report activities in the annual Game Status and Trend Report.

Strategies:

a. Include documentation of turkey conflicts and actions taken in a reporting system to be developed to monitor statewide wildlife conflicts and related activities.
b. Provide public education materials that address feeding and other practices that can lead to conflict situations with wild turkeys.
c. Encourage planting alternate food sources to keep nuisance or damage-causing turkeys away from habitual problem areas.
d. Utilize general season harvest as the preferred method of addressing chronic conflict areas.
e. Work with landowners who experience damage caused by turkeys to allow public hunting access.

Issue Statement

Turkey seasons have expanded recently and more intensive monitoring may help determine the need to make future season modifications and identify other population management needs.
**Objective 111:**

Where fall seasons are in place, and other areas where an emphasis is needed, expand monitoring of turkey populations utilizing the protocol developed in NE Washington population management unit (PMU) or other appropriate methods, to track changes in populations over time.

**Strategies:**

a. Evaluate other turkey PMUs and implement monitoring where needed.
b. Track changes over time in relationship with season and other changes to identify needs for adaptive management.
c. Consider implementation of spring surveys where recruitment appears to be a concern and if warranted investigate causes that may be limiting production.
d. Consider citizen based monitoring as an option that may contribute to knowledge of the status of populations.
e. By 2017, establish population, harvest, or recreational objectives for each turkey PMU or smaller geographic units to guide season setting recommendations.
f. Where populations decline below desired objectives, recommend season adjustments to the Fish and Wildlife Commission.

**Issue Statement**

Turkeys occupy almost all suitable habitats in Washington. In the Turkey Management Plan, one area in Skagit and Whatcom counties was identified as a potential introduction area. After an evaluation and public input, it was determined to not move forward with an introduction. No other new introductions of turkeys are envisioned although augmentation of existing populations may be appropriate in some local areas. The goal of a wild turkey release is to establish a self-sustaining, huntable population in habitats and locations that do not result in significant conflict problems.

**Objective 112:**

By 2017, develop a list of release sites within established turkey range that may benefit turkey populations and minimize human conflicts. Release turkeys at these locations when relocation is necessary to abate damage or other conflict.

**Strategies:**

a. As relocation needs arise, to address wildlife conflict issues, identify release sites that may have the greatest benefit in terms of augmenting populations that are below desired levels.
b. Maintain the integrity of subspecies distribution by limiting releases to areas where a given subspecies already occurs.

**Issue Statement**

The 2005-2010 Wild Turkey Management Plan (WTMP) has not been updated. As described in the WTMP, many areas of the state have strong, self-sustaining populations. However, in some areas of the state, particularly southwest Washington, turkey introductions have not resulted in robust populations. Factors limiting turkey population growth in these areas have not been identified and evaluated. Wildlife conflict and other issues exist in other parts of the state where turkey populations are more robust.
**Objective 113:**

Monitor turkey population trends in each Wild Turkey Population Management Unit (PMU) annually. Identify limiting factors and modify management strategies as needed to address population, harvest, or recreational objectives to increase populations.

**Strategies:**

a. Use harvest and other monitoring data to track population trends in each PMU.

b. Identify and evaluate potential factors affecting population levels in PMUs with low or negative population growth.

c. Evaluate whether an updated statewide WTMP is needed to address future management needs. Update the plan or develop an alternative strategy to prioritize and communicate management objectives.

**Recreation Management**

**Issue Statement**

Turkey populations in some portions of Washington have increased and expanded hunting opportunities were recently added. WDFW commonly receives comments in favor of allowing hunting methods that are currently prohibited in the state such as the use of dogs or rifles to harvest turkeys.

**Objective 114:**

Monitor spring turkey harvest where fall seasons occur to determine if fall harvest is affecting spring hunter success, and evaluate potential changes to allowed hunting methods.

**Strategies:**

a. Attempt to determine if either sex fall hunting affects male turkey harvest during the following spring hunt.

b. Monitor hunter participation, success rates, and opinions.

c. Identify and evaluate potential fall season modifications each year and recommend changes when necessary to meet population or recreation needs.

d. Evaluate public opinion and any potential management benefits of expanding the methods that can be used to hunt turkey and make recommendations for changes to the Fish and Wildlife Commission as appropriate.

**Issue Statement**

Turkey hunters and district biologists report that turkey-hunting opportunities in some areas of eastern Washington are limited due to large acreage owned by private landowners. Private land access was also identified as an important issue in hunter opinion surveys conducted by WDFW.

**Objective 115:**

Over the next five years, increase the number of acres of private land available in WDFW’s access programs for public turkey hunting by 10% from 2013 levels within priority turkey range.
Strategies:

a. Encourage landowners experiencing damage from turkeys to consider allowing open or controlled hunting access as a primary option to mitigate conflicts.
b. Place a particular emphasis from WDFW’s private lands access program within turkey PMU 10 and 15.
c. Partner with local chapters of the National Wild Turkey Federation and other sportsman’s groups to find landowners who would allow public hunting.
d. Offer enhanced incentives to landowners in high priority areas especially where public lands are limited.

Habitat Management

Issue Statement

Opportunities to enhance wild turkey habitat exist on private and public lands throughout areas supporting turkey populations. Improving habitat conditions for turkeys can also have additional values to other wildlife species that utilize the same resources. Habitat enhancements can also mitigate conflicts with turkey populations on private lands.

Objective 116:

Conduct 10 habitat improvement projects in key wild turkey management areas to accomplish multiple goals including addressing conflict issues, improving public recreational opportunities, and improving habitat conditions for multiple species by 2021.

Strategies:

a. Identify and prioritize key areas and strategies for habitat improvement.
b. Work with the National Wild Turkey Federation and others to combine funding and resources to achieve maximum benefits.
c. Facilitate habitat enhancement projects on private and public properties within identified high priority areas (e.g., oak habitat enhancement in Klickitat County, aspen regeneration in northeast Washington, cottonwood regeneration and riparian enhancement across the turkey range).
d. Develop habitat enhancement projects to help address issues related to winter conflict complaints with a particular emphasis in Region 1.
e. Prioritize enhancement projects on areas open to public hunting and in areas that benefit species of concern or benefit a wide variety of wildlife species.

Research

Issue Statement

Research on wild turkeys in the western United States is not common. If research were to be done in western habitats, managers would have better information to use when managing the species. Hunters and some biologists express concerns that the expansion of the turkey range may have potential effects on native wildlife populations, but linkages are difficult to document.

Objective 117:

Support at least one research project that increases knowledge of wild turkeys in western habitats.
**Strategies:**

a. Cooperate with public and private entities (e.g., National Wild Turkey Federation) to develop research projects in Washington.

b. Develop and/or participate in inter-specific competition research projects funded through the National Wild Turkey Federation and other public or private entities.

c. Consider a project that seeks to identify limiting factors for the eastern subspecies in western Washington and actions that may address those needs.
I. POPULATION STATUS AND TREND

Historically, mountain quail have existed in western Washington and along the southern border of the state in eastern Washington. Populations in western Washington are thought to have been introduced and introductions may have once expanded their range in eastern Washington as well. However, mountain quail populations in Washington have been low for some time. While there are a few areas in western Washington that hold birds, eastern Washington populations have all but disappeared. The last known mountain quail populations in eastern Washington were in southeastern Asotin County. Although several releases of translocated birds have occurred in this vicinity and nearby areas in Idaho and Oregon, the current status of this population is largely unknown but is assumed to be at a low density as sightings are rarely reported.

II. RECREATIONAL OPPORTUNITY

The current mountain quail hunting season extends from the last weekend in September or the first weekend in October through November 30 in western Washington; however, there have been no hunting seasons for mountain quail in eastern Washington since 1997. The 2012 quail harvest in western Washington was less than 400 birds with mountain quail representing an unknown portion of that harvest. Mountain quail do not represent a major recreational opportunity in the state of Washington for hunters although they do represent a unique opportunity for hunters wanting to harvest multiple species and birders who travel to add this bird to their checklists.

III. DATA COLLECTION

Currently, only incidental data on statewide mountain quail populations in Washington is being collected. These observations, which include periodic monitoring of online birding reports, indicate that mountain quail continue to be limited in distribution and abundance. For this reason, the species has been identified as a “species of greatest conservation need” within its native range by WDFW. The Department, in cooperation with the University of Idaho, and State of Oregon has translocated mountain quail on several occasions to the Blue Mountains area as part of a population re-establishment project. Most of these releases have included monitoring of a subset of the released birds. Data collected through these efforts included survival, nest success, and habitat use.

IV. MOUNTAIN QUAIL MANAGEMENT GOALS

The statewide goals for mountain quail are:

1. Preserve, protect, perpetuate, and manage mountain quail and their habitats to ensure healthy, productive populations.
2. Manage mountain quail for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, wildlife viewing, cultural and ceremonial uses by Native Americans, and photography.
3. Manage western Washington mountain quail populations for a sustained harvest.
V. MANAGEMENT ISSUES, OBJECTIVES, AND STRATEGIES

Habitat Management

Issue Statement
Mountain quail reintroduced into the Blue Mountains region have not flourished, possibly indicating a habitat deficiency. Degradation of riparian and brush habitats due to hydroelectric development, past grazing practices, and fire exclusion is believed to be the primary factor leading to the decline of mountain quail (Brennan, 1990), but direct links have not been confirmed. Others have speculated that introduced species may be a contributing factor but this has not been investigated. Further work is needed to develop prescriptions to guide habitat management and enhancement for this species. Mountain quail released into southeastern Washington in 2005 and 2006 were monitored through a cooperative effort with the University of Idaho, resulting in a student producing a master’s thesis that included habitat use information, which will be helpful in defining future habitat management efforts.

Objective 118:
Utilize existing information to help determine distribution of suitable mountain quail habitat and the need for enhancement within the bird’s native range in Washington by 2016.

Strategies:
- Develop a map showing potential mountain quail habitat.
- Conduct an evaluation of eastern Washington mountain quail habitat conditions and suitability based on results of monitoring released quail and historical information.
- Develop prescriptions for enhancement projects based on the evaluation that consider the potential effects of climate change.

Objective 119:
Much of the habitat believed to be within the historic range of mountain quail is on public lands. Work with WDFW, USFS, and other public land managers to assure the habitat needs of mountain quail are considered in planning and management decisions and opportunities for enhancements are not foregone.

Strategies:
- Include provisions for mountain quail in appropriate WDFW wildlife area plans.
- Participate in US Forest Service and other federal land management planning and work with local managers to assure that mountain quail are considered.
- Identify and implement at least two habitat enhancement projects for mountain quail by 2021.

Population Management

Issue Statement
Mountain quail occupy little of their historic range in eastern Washington. On several occasions, wild-trapped mountain quail from southwestern Oregon have been released in southeastern Washington. These projects were part of an effort to re-establish mountain quail populations in part of their historic range. Because this species is believed to be present and low densities in relatively remote locations, determining a population trend is very difficult.
Objective 120:
Evaluate results from re-introduction efforts in Asotin County by 2016 and the need to modify release strategies. Consider additional reestablishment projects in historic range in eastern Washington if suitable habitat is determined to be present.

Strategies:

a. Evaluate past reintroduction attempts to determine if they have, or are contributing to, development of a self-sustaining population.
b. Coordinate with, and consider information and results of reintroduction efforts in other states in evaluating methods and the need for adaptive strategies.
c. If the probability of success is determined to be sufficient, continue to coordinate with Oregon and Idaho on additional transplant efforts.
d. Secure additional funding to support research or additional reintroduction efforts.
e. Implement short term monitoring of any released birds and attempt to monitor long term population trends.

VI. LITERATURE CITED

FOREST GROUSE: Dusky Blue Grouse (*Dendragapus obscurus*), Sooty Blue Grouse (*Dendragapus fuliginosus*), Ruffed Grouse (*Bonasa umbellus*), and Spruce Grouse (*Falcipennis canadensis*)

I. POPULATION STATUS AND TREND

Forest grouse in Washington include dusky blue grouse (*Dendragapus obscurus*), sooty blue grouse (*Dendragapus fuliginosus*) and ruffed grouse (*Bonasa umbellus*), which occur throughout the forested lands in Washington, and spruce grouse (*Falcipennis canadensis*) that are closely tied to higher elevation spruce/fir habitats. Statewide biological surveys designed to estimate forest grouse populations have not been conducted in Washington for many years. Population monitoring has been based on the long-term harvest trend (Figure 1). Harvest estimates are based on a mailed hunter survey following each season. This trend shows an apparent long-term decline in statewide forest grouse populations. Both harvest and hunter numbers were relatively stable from 1998 to 2010 but have both dropped during each of the last two seasons. It is difficult to draw concrete conclusions because harvest estimation methods have changed over time and other factors such as hunter effort and access to forest lands may be biasing results.

A wing collection study in 1997 revealed that hunters did not accurately report the species of grouse harvested. Because hunters have not been able to accurately report the species harvested, evaluating harvest, and population trends for individual species is very difficult. Although it is apparent that there has been a decline, current grouse populations are thought to be relatively healthy. However, loss and fragmentation of habitat due to urban expansion and changes in plant communities resulting from new forest management techniques, wildfires and other factors may impact population status over time.

![Figure 1: Estimated statewide forest grouse harvest and hunter participation 1962 to 2012.](image)
II. RECREATIONAL OPPORTUNITY

The current Sept. 1 to Dec. 31 forest grouse hunting season has been in place since 1987. This is similar to seasons in eastern Oregon (Sept. 1 – Dec. 31) and most of Idaho (Aug. 30 – Dec. 31). Northern Idaho and western Oregon have longer seasons which extend to January 31. The daily bag limit of three of any species (mixed or straight bag), that had been in place since 1952, was changed to four birds per day in 2009. This change was made primarily to increase interest in grouse hunting but has been a topic of controversy with some hunters and biologists.

Estimated hunter numbers slowly declined from the late 1980s through 1997, then fell sharply in 1998 and 1999 (Figure 1). The decline seen in 1999 may be a result of sampling difficulties that made data collection inconsistent with previous and subsequent years. Hunter numbers rebounded in 2000 and were fairly consistent through 2009 when a drop that also may be related to changes in survey methods occurred. Both grouse harvest and hunter numbers reached all-time lows in 2012.

III. DATA COLLECTION

Statewide population surveys for forest grouse have not been conducted for some time. However, forest grouse wings have been collected since 1998 by placing barrels in strategic locations in north-central Washington where hunters voluntarily deposit one wing from each grouse killed. Wings were classified as to species, sex, and age and the results potentially give some insight to changes in age structure and harvest, which varied among three grouse species. The changes observed may be related to habitat alteration by a major forest fire in the region but a direct linkage cannot be made.

Statewide wing collections from 1993-95 provided several pieces of important information, such as, more than 70% of forest grouse harvest occurs in September and early October, before modern firearm deer seasons. Therefore, current seasons that extend through December probably have very little impact on grouse populations. In addition, there is a tendency for hunters to misidentify grouse species, which has resulted in forest grouse species being combined for current harvest survey purposes.

The most extensive data set held for forest grouse is harvest estimation, which has been collected since 1963. Hunter harvest data initially was collected by surveying approximately 10% of hunting license buyers, but the survey is now sent to 25,000 individuals each year and includes buyers of both big game and small game licenses as grouse can be harvested with either license. These data are reported in the annual WDFW Game Harvest Reports and summarized in annual Game Status and Trend Report.

IV. FOREST GROUSE MANAGEMENT GOALS

The statewide goals for forest grouse are:

1. Preserve, protect, perpetuate, and manage forest grouse and their habitats to ensure healthy, productive populations.
2. Manage forest grouse for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, wildlife viewing, cultural, and ceremonial uses by tribes, and photography.
3. Manage statewide forest grouse populations for a sustained harvest.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Population Management

Issue Statement

Currently, forest grouse harvest is used as an indicator of population trend and is monitored at the WDFW regional level. However, this monitoring method has not allowed WDFW to determine the cause of harvest declines, which could be due to declines in either grouse populations, or hunter participation, or a combination of both. Additionally, the regional level of data collection has not been adequate to evaluate harvest or population changes at smaller scales.

Objective 121:

Using existing harvest data, build a dataset to evaluate harvest changes at the county level by 2016 and evaluate factors that may have contributed to changes in harvest by 2021. Consider including broader scale wing collections to evaluate individual species status and age structure in the evaluation.

Strategies:

a. Compile county level harvest data and attempt to identify factors that may be associated with changes in local harvest. Annually monitor for shifts in harvest that may be associated with human or naturally caused factors such as landscape level habitat alteration or access limitations such as road closures.

b. Investigate the potential to report grouse harvest on the WDFW website or through the Department’s mandatory reporting system to increase precision and implement if appropriate.

c. Evaluate past research, existing data and information, and compile a report outlining potential causes of forest grouse harvest declines and the need for additional research and monitoring.

d. If called for in the report above, implement new monitoring strategies to track harvest by individual species or to address other data needs.

e. Implement targeted monitoring or a research study that attempts to determine if forest grouse population density and age structure for each grouse species in appropriate habitats has declined from historic levels and how hunter harvest, habitat changes and other factors may be affecting populations.

f. Develop citizen based monitoring approaches as an option to track changes in grouse populations.

Recreation Management

Issue Statement

Forest grouse harvest and hunter participation have declined. Hunters and some biologists have expressed concerns related to season timing, harvest methods, habitat changes, and declining opportunity.
Objective 122:

Investigate potential causes of declining participation by 2017 and if not related primarily to confirmed declines in grouse populations, take appropriate measures to increase interest and opportunity. Recommend changes to harvest strategies if needed to address population declines.

Strategies:

a. Work with private and public landowners to maintain and expand hunting opportunity especially in areas where road access has been restricted.

b. Make information available to hunters regarding Washington’s variety of grouse hunting opportunities and the identifying characteristics of each species.

c. If hunting is found to be a contributing factor to declines in forest grouse under objective 119, make recommendations for season or bag limit changes to the Fish and Wildlife Commission to address population needs.

Objective 123:

Conduct a survey by 2017 to evaluate hunter opinions related to allowed forest grouse harvest methods and seasons from a social perspective and their effect on populations. Based on the results, and grouse population management needs, consider making recommendations to modify regulations.

Strategies:

a. Conduct a survey to evaluate hunter opinions on season structure and weapons used to harvest forest grouse and summarize the results.

b. Make recommendations to the Fish and Wildlife Commission to address specific issues that result from the survey and evaluation.
UPLAND GAME BIRDS: Pheasant (*Phasianus colchicus*), California Quail (*Callipepla californica*), Chukar (*Alectoris chukar*) and Gray (Hungarian) Partridge (*Perdix perdix*)

I. POPULATION STATUS AND TREND

According to harvest estimates, used as an index of population, upland bird populations in Washington have been declining since the early 1980s. Although both are well below historical highs, recent exceptions include quail where harvest increased from 1995-2003 and gray partridge which has been increasing since 2008. Harvest estimation techniques were consistent between 1984 and 2000, so estimates made during that time should be comparable. Since harvest estimation methods changed, to increase precision, downward trends have continued. Some concern does exist with the use of harvest as a population indicator as it can also be influenced by other factors such as reduced hunting access and a variety of economic and social factors.

Long-term pheasant harvest (Figure 1) tracks the changes in population levels which are believed to be due primarily to changes in the amount of quality habitat available in Eastern Washington and long-term/short-term climatic changes. In addition, crowing count surveys and brood index surveys conducted between 1984 and 1998 also indicated a decrease in pheasant populations in many areas of eastern Washington (Cliff Rice, pers. comm.). Reports from hunters and biologists support the theory that pheasant populations have decreased over time. Western Washington does not support self-sustaining populations of pheasants primarily due to the wetter climate. Hunting on the west side of the state is dependent upon releases of pheasants in the fall.

![Figure 1: Washington State Pheasant Harvest 1946-2012.](image-url)
Upland game bird fall population densities and related harvest are often dependent on spring weather conditions and available cover since chicks have a difficult time thermo-regulating in cold, wet weather conditions. In addition, chicks need high protein diets based on insects which also are highly dependent upon weather and plant stand composition. Although variable from year to year, harvest estimates for gray partridge and chukar have not dropped as dramatically in the last ten years. Currently, gray partridge and quail harvest is about equal to 1995 levels but chukar harvest is at an all-time low (Figure 2). In general, department biologist opinions of upland game bird populations correlate with the harvest estimates seen in Figures 1 and 2, but some have suggested that chukar may be an underutilized resource from a recreational harvest perspective in some portions of the state. Breeding Bird Survey (Sauer et al., 2014) summary results suggest a stable or recent slightly increasing trend for chukar in Washington but this result is based upon a small sample size.

![Figure 2: Quail, Chukar and Gray Partridge Harvest 1984-2012.](image)

Current upland bird management efforts focus largely on pheasant in an identified focus area that includes portions of Whitman, Walla Walla, Columbia, and Garfield Counties. This area was chosen due to high populations of pheasants that had previously occupied the area, adequate rainfall to conduct enhancements without the need to irrigate, and anticipated cost effectiveness. Specific enhancement efforts target establishment of forbs and diversification of permanent herbaceous cover to increase insect availability during the brood rearing period which is believed to be the key factor limiting reproduction and population size. These efforts expanded in scope significantly in 2013 on private lands and agreements with landowners include hunting access as well.

**II. RECREATIONAL OPPORTUNITY**

Eastern Washington pheasant season timing has varied over time but has been relatively consistent over the past 10 years. For many years, the season started in early to mid-October and lasted through December 31, providing hunters 11 or 12 weeks of hunting, depending on the year. In 2004, the pheasant opener was moved to the weekend after general deer season, one week later
than previous years. With that move, the season ended up shortened in 2004. In 2005, the season was extended into January to maintain the number of hunting days.

In 2012, an estimated 14,950 people hunted pheasant in eastern Washington. The 2012 Western Washington Pheasant Licenses sales totaled 4,461. It is unknown how many hunters hunt on both sides of the state. Both of these participation levels have declined significantly over the past decade. The largest decline in western Washington was associated with the new license, but hunter numbers have increased slowly since that change went into effect. This is in contrast with the estimated high of 142,000 in the early 1950s and a more recent high of 109,000 in 1979 (Figure 3). A spike in hunter participation in 1997 may have been due to the initiation of rooster pheasants releases in the fall through the Eastern Washington Pheasant Enhancement Program.

![Figure 3: Estimated Pheasant hunter Participation in Washington 1949-2012.](image)

Hunting seasons for other upland game birds have also varied in length over the years. During the 1960s and 1970s, the chukar season was split into early and general seasons, depending on geographic area. In 1997, the early-general season was eliminated in favor of a standardized season running from early October to mid-January, which is the current regulation. The bag limit for chukar was reduced after the population crash in the early 1980s, from 10 birds per day to six. Currently, the daily bag limits for chukar and gray partridge are six of each species, and quail has a bag limit of 10. In 2012, an estimated 10,097 people hunted quail, 3,004 hunted chukar, and 2,343 hunted gray partridge.

III. DATA COLLECTION

Three types of pheasant surveys were conducted up until the mid to late 1990s in most areas of the state; 1) sex ratio counts in February and March; 2) crow counts (a male pheasant population index) in late April and early May; and 3) production counts in late July and August. In addition, aerial population surveys for chukar were completed through the late 1990s. All of these surveys
were discontinued which was primarily due to the limited time and funding for district biologists considering all game species priorities.

A post-season mail survey of hunters is conducted to estimate harvest and hunter effort. Recent improvements are believed to have increased the precision of the estimates. The improvements centered on how hunters who receive the survey are selected based on their responses to a preseason survey at the time they purchase their license.

Pheasant call count and brood surveys were reinitiated in 2010 in the pheasant focus area as a mechanism to monitor changes in this area where enhancement efforts are focused. Data analysis, as of the third year of crowing surveys, had not detected either an upward or downward trend. Brood surveys were discontinued after the first year due to limited staff availability to complete survey routes.

IV. UPLAND GAME BIRD MANAGEMENT GOALS

The statewide goals for upland game birds are:

1. Preserve, protect, perpetuate, and manage upland game birds and their habitats to ensure healthy, productive populations.
2. Manage upland game birds for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, wildlife viewing cultural and ceremonial uses by Native Americans, and photography.
3. Manage statewide upland game bird populations for a sustained harvest.

V. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Habitat Management

Issue Statement

Pheasant habitat in eastern Washington continues to be lost, altered, or degraded over time. This is considered a major factor in the decline in pheasant populations (Flaherty 1979). In order to maximize the benefits and likelihood of success in enhancing populations, a pheasant focus area has been identified in southeastern Washington. The premise behind this approach is that individual projects spread across a wide landscape are less likely to have a meaningful impact on increasing the population than efforts focused in a smaller area. Three major factors influenced identification of this area: 1) cost of improving habitat is relatively low when compared to irrigated agriculture areas; 2) annual rainfall in the area is conducive to producing quality habitat without irrigation; and 3) availability of federal Farm Bill programs (e.g., Conservation Reserve Program). The pheasant focus area lies in the Snake River basin, one of the three major pheasant producing areas in the state where there is little public land managed for conservation or wildlife. Conversely, the Yakima and Columbia basins both have significant land dedicated to fish and wildlife habitat where upland birds should do well. By working with private landowners in the pheasant focus area, WDFW can help assure that the area remains a major contributor to pheasant production and recreational harvest.
**Objective 124:**

Continue to focus enhancement efforts in the pheasant focus area. Work with and/or provide incentives to private landowners to enhance a minimum of 5,000 acres of habitat especially for nesting and brood rearing. Maintain existing agreements that foster quality habitat.

**Strategies:**

a. Work with public and private landowners and funding agencies (e.g., United States Department of Agriculture (USDA)) to increase quality pheasant habitat acreage through programs like the Conservation Reserve Program (CRP). Specific emphasis will be put on “mid-contract management” to maintain diverse plant stands in conservation cover.

b. Improve pheasant habitat quality by funding habitat improvement projects through the Eastern Washington Pheasant Enhancement Program (EWPEP) and the Partnerships for Pheasants program. Seek grants when available to increase enhancements.

c. Integrate pheasant habitat improvements and priorities with projects designed to improve native species needs (e.g., sharp-tailed grouse and salmon).

d. Partner with non-governmental organizations (e.g., Pheasants Forever) to enhance habitat and produce and distribute habitat enhancement informational material to landowners.

**Objective 125:**

Maintain or improve conditions for all upland game birds within their primary ranges.

**Strategies:**

a. Participate in public land management planning processes to assure that upland bird habitat conditions are considered in decisions.

b. Continue to assist landowners in implementation of Conservation Reserve and other farm bill programs to enhance habitat conditions.

c. Partner with non-governmental organizations (e.g., Pheasants Forever) to enhance habitat and produce and distribute habitat enhancement informational material to landowners.

**Population Management**

**Issue Statement**

Harvest trends indicate that upland bird populations continue to decline.

**Objective 126:**

Monitor pheasant population status and trend to be able to detect a 20% change over three years within the pheasant focus area and any other key areas identified for habitat improvement. Document results in the annual Game Status & Trend Report.

**Strategies:**

a. Continue to conduct annual pheasant crow count surveys in the pheasant focus area as the primary mechanism to monitor for population trends.

b. Consider use of methods to monitor pheasant brood size as a measure of the effectiveness of current enhancement strategies and a predictor of fall harvest opportunities.

c. Evaluate or apply other survey types that may assist in developing a better understanding of population changes and influencing factors.
Recreation Management

Issue Statement

Hunters and district biologists report that upland game bird hunting opportunities in some areas of eastern Washington are limited due to large acreage owned by private landowners who limit access to the public. Private land access has also been identified as an important issue in hunter opinion surveys conducted by WDFW. From 2010 to 2012 Snake River Basin (pheasant focus area) hunter numbers averaged 5,500 per year. Some field reports and Breeding Bird Survey summaries suggest that chukar hunter participation rates may have declined more rapidly than bird populations in some areas leading some to believe that chukar represent an underutilized resource.

Objective 127:

Increase pheasant hunter numbers in the pheasant focus area to 9,000 by 2021.

Strategies:

a. As funding allows, offer incentives to private landowners to encourage participation in WDFW hunter access programs on sites with quality pheasant habitat.

b. Continue to improve and expand information available to hunters on where public hunting access is available through the agency website, written materials, and other sources and applications.

c. Include the use of the reservation program and other measures to provide quality-hunting areas on a portion of the lands enrolled.

d. Conduct at least one random survey to assess eastern Washington pheasant hunter satisfaction and opinions as was done in 2003 and 2007.

Objective 128:

By 2021, investigate whether chukar population declines or other factors are the primary cause of chukar harvest and chukar hunter participation.

Strategies:

a. Conduct hunter surveys and other investigations or inventories to determine if declining hunter access or unavailability of information are primary causes of the reduction in chukar hunter numbers.

b. Based on survey results, implement targeted hunter access outreach to landowners or marketing to hunters to encourage participation.

Issue Statement

Some upland bird hunters are dissatisfied with the current season structure which may not be the most conducive to encourage participation and recruit new hunters.

Objective 129:

Evaluate potential changes to the current season structure that may expand interest and participation in upland bird hunting by 2017. Make recommendations to the Fish and Wildlife Commission if changes are found to be beneficial.
**Strategies:**
a. Seek hunter opinions and preferences through surveys and the Upland Game Advisory Committee.
b. Evaluate earlier or split seasons as options to increase interest and participation.

**Issue Statement**
Estimated harvest figures indicate that there has been a decline in upland bird harvest for all species over the past 10 years. Harvest estimates are used as an indicator of overall harvest and population status, as well as hunter effort, and are the best long-term data set held by WDFW.

**Objective 130:**
Estimate and monitor upland game bird harvest through a random survey on a yearly basis and assess other ongoing surveys as indicators of population trends by 2018. Consider changes to harvest monitoring strategies that may improve precision and reduce costs.

**Strategies:**
a. Continue to collect harvest information on a yearly basis, such that it is comparable to previous seasons.
b. Through a process that includes public involvement, assess the potential benefit and costs of implementing a mandatory reporting requirement for all upland bird hunters to improve harvest estimation.
c. Evaluate Christmas Bird Count, National Breeding Bird Survey, or other citizen based approaches to monitor upland bird population trends.

**Issue Statement**
Lead is a well-documented environmental toxin and lead shot use has been prohibited for all waterfowl, coot, and snipe hunting in Washington since a nationwide phase-in was implemented in 1986-1991. WDFW has expanded nontoxic shot requirements to pheasant release sites and other specific areas, based on a high potential for ingestion of lead by wildlife.

**Objective 131:**
As new information and nontoxic alternatives become available, make nontoxic shot use recommendations to the Fish and Wildlife Commission through the season setting processes.

**Strategies:**
a. Research, develop, and present recommendations to the Fish and Wildlife Commission regarding bird hunting with nontoxic shot.
b. Develop and implement a public outreach and communication plan regarding nontoxic shot use regulations.
c. Consider programs that promote voluntary use of nontoxic shot by hunters in lieu of lead.

**Issue Statement**
Some upland game birds exist in areas where sharp-tailed grouse and sage grouse can be found. Concerns over misidentification of game birds have been expressed, and it is important that hunters know the differences between upland game birds and non-game upland wildlife.
**Objective 132:**
Post WDFW managed properties and distribute educational materials to hunters that describe the differences between upland game species and non-hunted upland birds each year.

**Strategies:**

a. Improve the quality and availability of information describing the differences between pheasants and sharp-tailed grouse and sage grouse currently included in the annual Migratory Waterfowl and Upland Game Seasons Pamphlet.

b. Continue to post signs notifying hunters of sage or sharp-tailed grouse being present in areas where upland game bird hunting occurs.

**Research**

**Issue Statement**
Implementation of habitat enhancement in the pheasant focus area is designed to improve pheasant numbers, hunter harvest, and hunter participation. Different habitat enhancement techniques can have variable effectiveness on improving pheasant numbers and it is important to understand and utilize the most effective techniques. In addition, past efforts in working with landowners have shown that a variety of programs are necessary to meet individual needs and provide quality-habitat and hunting opportunity.

**Objective 133:**
Conduct research and include results in annual reports that describe efforts to evaluate habitat enhancement effects on pheasant population levels.

**Strategies:**

a. Complete the ongoing investigation designed to determine the best vegetation enhancement approaches to improving brood habitat for pheasants in the pheasant focus area.

b. Provide annual progress reports in the Game Status and Trend Report.

c. Update pheasant habitat management publications, USDA techniques publications, and informational brochures based on the results.

d. Continually assess the need for further investigations or targeted monitoring to assess habitat enhancements or upland bird responses to landscape changes.

**Eastern Washington Pheasant Enhancement Program (EWPEP)**

**Issue Statement**
The EWPEP was originally developed “to improve the harvest of pheasants by releasing pen-reared rooster pheasants…and by providing grants for habitat enhancement…” Initially, the majority of funding was allocated to the purchase of birds for release during the hunting seasons but harvest in eastern Washington continued to decline. Based on this observation and a State Auditor’s Office sanctioned performance audit, the program was changed to gradually shift funding from bird purchases to reach a point where the majority of the fund income would be used to enhance habitat which is believed to be a more effective approach.
Objective 134:

Continue to release rooster pheasants in eastern Washington at a level that devotes most of the fund income to habitat enhancements to produce wild pheasants.

Strategies:

a. Monitor annual program income and expenditures to determine appropriate levels.
b. Evaluate release program operations, public use of the program, and potential efficiency measures to maximize the value of the release program to hunters.
c. Focus habitat enhancements in identified key management areas (pheasant focus area).
d. Provide dedicated pheasant management and habitat improvement staff within the pheasant focus area.

Western Washington Pheasant Program

Issue Statement

In 1997, WDFW closed the Whidbey Island game farm to increase the efficiency of the program. Following that decision, the program went from being 61% self-funded to 78% with the remainder being paid for by general hunting license revenue. In 2009, the program was facing elimination due to impending budget reductions. To avoid the program’s elimination, the State Legislature created the Western Washington Pheasant License with a higher cost which was designed to make the program self-supporting. Initially, even though “buyer resistance” resulted in lower hunter numbers, the program income was more in line with expenses. Since that time, due to unanticipated operating cost increases associated primarily with bird feed, the funding balance remains negative with about 70% of operating costs covered by license revenue. It is important that this program become 100% self-funded since it is a recreational program serving a specific group of hunters and it is appropriate to ensure the program does not have a financial impact on general hunting license revenues. One positive sign is that since the new license went into effect hunter numbers have increased but at a slow rate. In response to the shortfalls, the number of birds produced for the program and staffing levels were reduced as cost saving measures. Even with the reduction in birds produced, the program is currently releasing more birds per hunter than before the new license went into effect. Another key issue for the program has been the loss of several popular release sites which have been difficult to replace.

Objective 135:

Monitor license revenue generated and consider efficiencies and other changes necessary to make the program self-supporting.

Strategies:

a. Evaluate expenditures and look for efficiencies to reduce operating costs at the game farm.
b. Consider measures to reduce the costs of transporting birds to release sites.
c. If needed, adjust the number of birds produced to reach expenditure goals.
d. Conduct or encourage targeted marketing to attract hunters back to the program and recruit new hunters resulting in increased revenue.
e. Consider changes to the license fees or structure that may recruit hunters or increase net revenue.
**Objective 136:**

Secure at least four replacement and new release sites by 2021 and attempt to strategically locate them to increase interest and participation in the program.

**Strategies:**

a. Secure suitable release sites near Longview, Montesano/Aberdeen, Mount Vernon, and near a population center on the northern Olympic Peninsula.

b. Support acquisition projects that could provide recreational release site hunting for upland birds.

c. Enter into release site agreements with other landowners.

d. Improve the quality of existing release sites to avoid the need for future replacement.

**VI. LITERATURE CITED**


SMALL GAME, FURBEARERS, AND UNCLASSIFIED SPECIES

I. CLASSIFICATION

In Washington, there are approximately 31 mid-to-small sized mammals or mammal groups that can be hunted or trapped (Table 1). Of these, 5 species are classified as game species (including 3 cross-classified as furbearers) that can be hunted (RCW 77.12.020; WAC 232-12-007). Eleven of the 31 species or groups are classified as furbearers (indicating that their hide has a commercial value in the fur industry). These 11 species can be trapped but not hunted unless seasons have been established (i.e., 3 species cross-classified as game species). The remaining species or species groups are “unclassified,” and can be trapped or hunted year-around.

Table 1. Mid-to-small sized mammals that can be hunted or trapped in Washington.

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<th>Species</th>
<th>Genus species</th>
<th>Classification</th>
<th>Trapped</th>
<th>Hunted</th>
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<td>Sylvilagus spp.</td>
<td>Game animal</td>
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<td>Snowshoe hare</td>
<td>Lepus americanus</td>
<td>Game animal</td>
<td>X</td>
<td></td>
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<td>Bobcat</td>
<td>Lynx rufus</td>
<td>Game animal &amp; furbearer</td>
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<td>Game animal &amp; furbearer</td>
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<td>Martes americana</td>
<td>Furbearer</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Mink</td>
<td>Mustela vison</td>
<td>Furbearer</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Mountain beaver</td>
<td>Aplodontia rufa</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Muskrat</td>
<td>Ondatra zibethicus</td>
<td>Furbearer</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>River otter</td>
<td>Lutra canadensis</td>
<td>Furbearer</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Coyote</td>
<td>Canis latrans</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>European rabbit</td>
<td>Oryctolagus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Gophers</td>
<td>Thomomys spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Gray and fox squirrels a</td>
<td>Sciurus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Ground squirrels b</td>
<td>Urocitellus, Otospermophilus Callospermophilus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Mice</td>
<td>Mus, Onychomys, Reithrodontomys, Peromyscus, Perognathus, Zapus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Moles</td>
<td>Scapanus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Nutria</td>
<td>Myocastor coyus</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Virginia opossum</td>
<td>Didelphis virginiana</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Porcupine</td>
<td>Erethizon dorsatum</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Rats</td>
<td>Dipodomys, Neotoma, Rattus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Shrews</td>
<td>Sorex, Neurotrichus spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Spotted skunk</td>
<td>Spilogale gracilis</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Striped skunk</td>
<td>Mephitis mephitis</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Voles</td>
<td>Clethrionomys, Lemmiscus, Microtus, Phenacomys spp.</td>
<td>Unclassified</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

151
Table 1. Mid-to-small sized mammals that can be hunted or trapped in Washington. (Continued)

<table>
<thead>
<tr>
<th>Yellow-bellied marmot</th>
<th>Marmota flaviventris</th>
<th>Unclassified</th>
<th>X</th>
<th>X</th>
</tr>
</thead>
</table>

a Except western gray squirrels (S. griseus) are protected and cannot be hunted or trapped.
b Except golden-mantled ground squirrels (S. saturatus and S. lateralis) and Washington ground squirrels (S. washingtoni) are protected and cannot be hunted or trapped.
c Except mazama pocket gophers (T. mazama) are protected and cannot be hunted or trapped.

II. POPULATION STATUS AND TREND

The abundance of individual small game animals, furbearers, and unclassified wildlife is largely unknown. However, because these animals typically have high population growth rates and often experience compensatory mortality, the risk of over-exploitation is low. Biological data on individual species populations are limited and concern with regard to harvest effects on some populations exists. With changes that occurred to Washington’s trapping regulations in 2000 that made harvest of some furbearers impractical or difficult, harvest numbers which were the primary indicator of population trends became less useful.

While statewide population of the animals listed in Table 1 are not believed to be at risk, declines or extirpations may have occurred in some geographic areas. Examples include martens in the Coast Range and Olympics and river otters in parts of eastern Washington. Further monitoring or data collection may be needed to better assess the status of some species.

III. RECREATIONAL OPPORTUNITY

A combination of hunting and trapping seasons are provided for small game and furbearing animals, respectively. Hunting seasons for small game animals typically extend from September to early spring of the following year. In 2012, approximately 7,070 snowshoe hares and cottontail rabbits were harvested by hunters. Hunter harvest of bobcat has not been estimated recently. However, bobcat was added to the statewide small game survey in 2013 and a reorganization of the CITES tagging program should provide better insight to bobcat harvest by hunters.

The trapping season for furbearers occurs during the winter months. There are currently about 400 fur trappers licensed in the state each year. In 2009, the total harvest of furbearers totaled 3,180 with beaver comprising most of the harvest. These figures represent a substantial decrease from the 1999 level of 12,116 animals taken when body gripping traps were still in general use. More recent harvest figures have not been fully summarized although staff has been working to correct this issue.

Unclassified wildlife can be hunted or trapped year-around (with appropriate license), and no bag limits are set. Harvest pressure is low for the majority of these animals, as there is little to no documented harvest for 12 of the 16 species or groups. Those that are harvested or trapped are often associated with human-wildlife conflict and lethal take is a mitigating tool for property damage or nuisance activities. Coyotes may be the most hunted unclassified species and much of this harvest is with the intention of harvesting fur. Coyotes were also added to the small game survey in 2013 in an effort to obtain a better idea of harvest levels.
IV. DATA COLLECTION

There are no formal population surveys for small game mammals, furbearers, or unclassified wildlife. Trends in total harvest and catch-per-unit-effort, which are collected annually using a hunter questionnaire or mandatory “Trapper’s Report of Catch” form are used as a general indicator of population status and trend for some species. Factors such as fur prices and changes in allowed trapping methods, such as occurred in 2000, should be considered when comparing harvest from different years.

A system is under development to collect data related to wildlife conflict with humans. Once in place, this information will be useful in expanding knowledge of some species of furbearer and unclassified species abundance and range. Over time, it may also be used to help assess trends in wildlife populations and identify species distributions at the local scale.

V. ALL GAME, FURBEARERS, AND UNCLASSIFIED WILDLIFE MANAGEMENT GOALS

1. Preserve, protect, perpetuate, and manage species and their habitats to ensure healthy, productive populations.
2. Manage wildlife species for a variety of recreational, educational and aesthetic purposes including hunting, trapping, scientific study, cultural and ceremonial uses by Native Americans, wildlife viewing, and photography.
3. Manage statewide populations for a sustained yield.

VI. ISSUE STATEMENTS, OBJECTIVES, AND STRATEGIES

Population Management

Issue Statement

There is little documentation on the current distribution and relative densities of individual small game and furbearer species in Washington. In some instances, more detailed information is needed to assess population status on a local or regional basis.

Objective 137:

Revise the distribution maps for select small game and furbearer species by 2017.

Strategies:

a. Revise the distribution maps from harvest and trapping data, citizen observations, and regional biologist interpretations.
b. Verify distribution as necessary from survey and ground truthing activities.
c. Evaluate the relative abundance and distribution of River Otter in eastern Washington to evaluate whether current harvest closures and limits are still necessary.
d. Consider restrictions on harvest in areas where declines in a species have been documented.
e. If harvest or other information indicates a substantial decline in furbearing species, initiate or propose studies to determine causes of decline.
**Issue Statement**

In 2011, the State Legislature created a program that directs WDFW to permit the relocation of beaver to areas in eastern Washington with the goal of deriving ecosystem benefits such as water storage, suspended sediment reduction, and improved fish habitat. The Department may condition or decline to permit releases in areas where there may be threats to property, habitat conditions are not suitable, or other issues may exist. Once reduced to very low population levels, beaver have reestablished across much of their former range where suitable habitat is present. Habitat changes in some areas may be limiting the reestablishment of beaver populations. Proponents of beaver relocation have suggested that beaver trapping for fur harvest could compromise their goals but this has not been verified.

**Objective 138:**

Current criteria for evaluating beaver release locations are mostly subjective. The documentation of beaver presence/absence prior to release and post release monitoring varies widely among projects. Develop stronger science based criteria for assessment of release sites and begin utilizing citizen observations of beaver activity to assess where projects are appropriate by 2016.

**Strategies:**

a. Review pertinent literature and develop enhanced guidelines relating to habitat for release evaluation.

b. Encourage monitoring of released animals and their effect on ecosystems.

c. Include beaver in a program-wide citizen wildlife reporting system.

d. Monitor beaver harvest at a more local scale where beaver introductions are occurring.

e. Provide information to trappers about reestablishment efforts and areas.

f. Encourage habitat enhancement as a primary mechanism to attract beaver back into historically occupied habitat.

**Recreation Management**

**Issue Statement**

Currently, there is no harvest reporting mechanism for unclassified wildlife, except those that are reported as non-target or nuisance captures on trapper’s report of catch forms. An online system for reporting trapping harvest was developed but due to programming issues no longer functions. Moreover, the trapper report of catch forms have been problematic in terms of ease of reporting and data entry. Information for persons interested in trapping in Washington is currently difficult to obtain. Concerns have arisen that misidentification by hunters could result in harvest of protected species, particularly wolves being mistaken for coyotes.

**Objective 139:**

Develop an improved web based reporting system for harvest of furbearers and unclassified wildlife and improve the availability and applicability of information available to trappers and persons interested in becoming trappers by 2016. Improve and provide identification information to avoid accidental harvest of protected species.

**Strategies:**

a. Develop a new interim solution, but pursue a long-term option of including trapper reporting in the WDFW license system by 2018.
b. Attempt to spatially enable the reporting system to expand the ability to evaluate species range and presence at a local scale.

c. Provide a mechanism for reporting capture of non-target species.

d. Evaluate mechanisms to document and monitor harvest of bobcat, coyote, and several other unclassified species by hunters and depredation control activities.

e. Develop new webpages related to trapping laws, methods, and techniques by 2016.

f. By 2016, improve materials to aid and educate hunters on how to distinguish coyotes from wolves and provide on the agency website, in hunting pamphlets, and in written materials distributed to hunters.

Conflict Management

Issue Statement

A 2014 survey found that more than a quarter of Washingtonians (29%) had experienced problems with wild animals or birds during the previous 2-year period. Raccoons were among the top two species cited as causing problems (deer was the top species cited). A small but substantial percentage of residents (10%) also indicated that coyotes cause problems (Responsive Management 2014). This means that an estimated 1.5 million Washington residents experience negative interactions with wildlife every two years (Responsive Management 2014; U.S. Census Bureau 2014).

Objective 140:

Improve information and strategies to reduce wildlife conflict related to small game, furbearers, and unclassified wildlife by 2017, and reduce the need for lethal removal of native species and leave animals in place when possible.

Strategies:

a. Increase legal harvest (trapping and hunting) in areas prone to furbearer and unclassified wildlife complaints by providing complaint information to hunters and trappers, and work with landowners to allow hunting or trapping. Use harvest during the trapping season as the preferred method of removing animals where conflicts exist.

b. Develop training materials describing long-term avoidance measures dealing with issues related to beaver dams and foraging activity for distribution to road management agencies, forest owners and other landowners. Train WDFW staff who work with landowners in these situations on the application of these measures to facilitate appropriate recommendations to landowners.

c. Work with other WDFW programs and other agencies to facilitate timely or streamlined processes to permit installation of in-water devices, where they are not likely to compromise other species needs such as fish passage to avoid the need to remove beaver to mitigate conflict situations.

VII. LITERATURE CITED


DISTRIBUTION LIST
This document was sent to all counties, tribes, and other interested parties in Washington State.
POLICY - 5302 FEEDING WILDLIFE DURING THE WINTER

This policy applies to all WDFW employees except if policies and procedures are in conflict with or are modified by a bargaining unit agreement, the agreement language shall prevail.

Definitions:

Artificial feeding: The distribution of harvested feed for wildlife through either supplemental feeding or emergency feeding.

Emergency feeding: The occasional feeding of wildlife, which the Department implements due to extreme winter conditions or a disaster such as fire or drought.

Supplemental feeding: The Department’s regular winter-feeding operations to provide feed to wildlife where adequate winter habitat is not available and feeding is necessary to support the population level as identified in a management plan, or for specific control of deer or elk damage.

1. WDFW May Provide Supplemental or Emergency Feeding for Wildlife Under the Following Conditions

A. To prevent and/or reduce deer or elk damage to private property (agricultural or horticultural crops).
B. To support a Department management plan.
C. To respond to an emergency as determined by the Director or the Director’s designee.
D. To allow for the regeneration of winter habitat that has been severely damaged or destroyed by disaster, such as fire or drought.
E. For Department approved wildlife research or wildlife capture.
F. In areas or times where hunting seasons have closed.
2. **The Director or Director's Designee Declares an Emergency**

Implementation of emergency feeding operations will begin after an emergency has been declared in a specific location of the state. The Director's Emergency Feeding Advisory Team will include the Assistant Directors of the Enforcement Program, Wildlife Program, and affected Regional Director(s).

3. **WDFW Will Use the Following Factors to Determine Whether an Emergency Exists in a Specific Location of the State**

   A. Weather conditions and forecast:
      Includes conditions such as abnormally cold temperatures, extreme wind chill, snow depth, icing, or crusting over a prolonged period of time. Evaluation may also include the forecasted weather to reflect early arrival and projected duration of severe winter weather.

   B. Concentration and distribution of wildlife:
      Includes assessment of wildlife patterns such as animals concentrated in unusually high numbers in a specific area or located in areas where they are generally not found.

   C. Access to natural forage:
      Assessment of availability of natural forage, including factors that may limit access (such as snow depth, icing, or crusting)

   D. Disaster:
      Includes description of disaster (such as fire or drought) and its impact on wildlife, such as winter range that has been severely damaged or destroyed. Feeding may be an option to provide adequate time for recovery of wildlife habitat and subsequently reduce wildlife mortality.

   E. Physical condition of wildlife:
      Evaluation to determine the physiological condition of animals, including experienced judgment by Department personnel based on knowledge of local wildlife. Evaluation may include bone marrow and kidney fat analysis to evaluate body fat reserves necessary for winter survival.

4. **WDFW May Discourage Private Feeding of Wildlife**

The Department discourages private feeding of wildlife where animals may become a problem or a nuisance, cause damage to property, or
present a health risk.

WDFW will provide the public with information on the appropriate way for winter-feeding of wildlife (i.e., deer, elk, upland birds, songbirds).

WDFW may provide feed in those situations where private actions will complement agency staff supplemental or emergency feeding.

5. **WDFW Will Accept Donations to Help Pay for Emergency Winter Feeding**
### Appendix B - Public Comments and Agency Responses

(Comment Period June 9 – July 19, 2014)

Note: The comments listed in this Appendix refer to the Objectives as they were written in the Draft Supplemental Environmental Impact Statement. Some of the Objectives have been re-written due to changes made to the plan as a result of these comments. In addition, several comments that were substantially the same were combined and the number in parentheses represents the number of similar comments.

<table>
<thead>
<tr>
<th>Objective 1: Game Division Section Managers, Regional Wildlife Program Managers, District Wildlife Biologists, and field biologists should each attend at least one professional seminar/workshop each year.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Hello, I’m commenting on Chapter 2, General Game Management Issues, Scientific/Professional Management of hunted wildlife, Objective 1 and strategies, pg 18 – 19.</td>
</tr>
<tr>
<td>Objective 1: Game Division Section Managers, Regional Wildlife Program Managers, District Wildlife Biologists, and field biologists should each attend at least one professional seminar/workshop each year.</td>
</tr>
<tr>
<td>Strategies: a. Agency staff will maintain regular contact with peer scientists and wildlife managers by attending</td>
</tr>
<tr>
<td>Wildlife Society, Western Association of Fish and Wildlife Agencies, and Technical Group meetings including the annual Game Division workshop or other professional workshops.</td>
</tr>
<tr>
<td>b. Significant impacts and the scientific basis for recommended actions will be “peer reviewed” by</td>
</tr>
<tr>
<td>scientists outside WDFW when determined necessary by WDFW biologists and managers.</td>
</tr>
<tr>
<td>I have two thoughts:</td>
</tr>
<tr>
<td>1. Suggest that strategy “a” would be more valuable if worded as follows &quot;Agency staff will maintain</td>
</tr>
<tr>
<td>regular contact with peer scientists and wildlife managers through a variety of forms of communication and</td>
</tr>
<tr>
<td>including attendance at professional workshops and internal agency workshops where the issues and</td>
</tr>
<tr>
<td>presentations are directly related to Game Division Programs&quot;. This gives agency managers flexibility in</td>
</tr>
<tr>
<td>determining whether, or not, the agenda of a workshop is sufficient for staff attendance especially if</td>
</tr>
<tr>
<td>the information can be obtained in some other manner. It also provides the manager with a way to focus</td>
</tr>
<tr>
<td>scarce public funds to get the best outcome.</td>
</tr>
<tr>
<td>2. Strategy &quot;b&quot; relies on &quot;peer review&quot; yet I wonder if &quot;peer review&quot; really means that the</td>
</tr>
<tr>
<td>recommended action is acceptable vs valid and how is that determined? Big difference. Does &quot;peer</td>
</tr>
<tr>
<td>review&quot; ensure the identification of high quality work? Are the tribal scientists, biologists, and managers</td>
</tr>
<tr>
<td>considered &quot;peers&quot;? I suggest that &quot;peer review&quot; be viewed through a very critical lens before employing it</td>
</tr>
<tr>
<td>and focus instead of close collaboration and cooperation with the tribes and others directly involved in</td>
</tr>
<tr>
<td>the research and management decisions. Thanks for the opportunity to comment.</td>
</tr>
<tr>
<td>(2 comments) Absolutely - need to keep updated on best possible sciences available.</td>
</tr>
<tr>
<td>(53 comments) Agree or yes.</td>
</tr>
<tr>
<td>as continuing education reasonably requires.</td>
</tr>
<tr>
<td>As long as they are going to learn something and not just go to.</td>
</tr>
<tr>
<td>(2 comments) As a minimum. To keep up on current science and research it is imperative they</td>
</tr>
<tr>
<td>attend these workshops for professional development.</td>
</tr>
<tr>
<td>At least one of these meetings should be out of state regardless of budget constraints.</td>
</tr>
<tr>
<td>Interaction with other state wildlife professionals is essential for the exchange of information.</td>
</tr>
<tr>
<td>Several of the workshops listed are out of state and allow interactions with managers and</td>
</tr>
<tr>
<td>scientists from across the western U.S. and even Internationally.</td>
</tr>
<tr>
<td>Cut their numbers by half unless they can come up with a plan that makes it possible for hunters</td>
</tr>
<tr>
<td>to achieve a 50% success rate.</td>
</tr>
<tr>
<td>Face to Face planning and instruction is always the best way to communicate and has the least</td>
</tr>
<tr>
<td>chance of misunderstanding.</td>
</tr>
<tr>
<td>Good, needed professional development.</td>
</tr>
<tr>
<td>I agree in part. The ENTIRE 9-member commission should be required to attend as well. IT should</td>
</tr>
<tr>
<td>be a condition of their appointment and if they don't comply they should be removed automatically.</td>
</tr>
<tr>
<td>Regional Program Managers, district and field biologists should attend at least two per year.</td>
</tr>
<tr>
<td>I agree that it would be helpful so long as it is directly related to their job title.</td>
</tr>
<tr>
<td>I believe there is a need to work on the department unless he or she is a hunter. The department seems</td>
</tr>
<tr>
<td>to forget that it is the sportmen that pay their wages with license fees etc.</td>
</tr>
<tr>
<td>I believe that our WDFW has many managers that sit in Olympia or elsewhere and talk things to</td>
</tr>
<tr>
<td>death. We need less managers and more people who are out in the field with boots on the ground actually</td>
</tr>
<tr>
<td>working to manage wildlife and working with sportmen instead of managing for more money for the</td>
</tr>
<tr>
<td>WDFW they should be managing the wildlife. It seems that WDFW only manages people any more, and not the animals that is their primary objective.</td>
</tr>
<tr>
<td>I can only assume that both Game Division Section Managers and Regional Wildlife Program</td>
</tr>
<tr>
<td>Managers have more responsibility than a field biologist. Perhaps the professional requirements</td>
</tr>
<tr>
<td>should coincide with the position.</td>
</tr>
<tr>
<td>If the purpose is to further their education, fine... If it is an excuse for travel - there are better uses</td>
</tr>
<tr>
<td>for limited PUBLIC money.</td>
</tr>
</tbody>
</table>
If they deem it necessary. A bit of these seminars are a total waste, and leave it up to professionals. Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

If your spending money and then not meeting to share information maybe we need to slash some department. Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

"It should be may attend" Makes sense. From my experience in other public agencies, training is among the early expenditures to be reduced or cancelled when funding is low. Thank you for your support of this objective and strategy.

More than one. There appears to be much more support for this objective than opposition. Thank you for your support of this objective and strategy.

Not necessarily. Often these are pretty useless. Don't spend money on this unless the results are actionable. Better off putting managers in the field during seasons with officers for on-the-ground experience. Thank you for your support of this objective and strategy.

Not really necessary if there is nothing in their field. Forces WDFW to "find" workshops for everyone. Costs not equal to benefit. Only key conferences/workshops are necessary. Better to just have town halls and meet hunters. Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

One a year seems low for workshops and seminars that's how we learn. The current language is should attend, that is similar to may. Thank you for your support of this objective and strategy.

Only directly relating to game management. Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

Only if workable solutions emerge from such meetings. Mandatory seminars/workshops are worthless unless usable results occur that will equal or exceed such seminars' costs. Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

Quarterly would be better. The current language does say "at least". Thank you for your support of this objective and strategy.

Should attend at least three. For new staff or in fields that are rapidly changing, this might be advisable, but the at least one language would cover those situations. Thank you for your support of this objective and strategy.

"What is the purpose of seminars? Are they required. " These are all good questions and ones that all good supervisors would ask of their subordinates applying to attend a workshop. In WDFW there are multiple approvals required to ensure that the workshop is appropriate and worth the investment.

Should be more than that as that is what the job is about. For new staff or in fields that are rapidly changing, this might be advisable, but the at least one language would cover those situations. Thank you for your support of this objective and strategy.

Should be one paid per year like most professions. You are free to pay for your own. Thank you for your support of this objective and strategy.

"Professional". Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

To help have town halls and meet hunters. Several comments support the objective and strategy with the condition that the seminar or workshop should be relevant to the job. So we added language to that effect in the objective.

"Should read shall attend" Thank you for your comment.

Significant impacts and the scientific basis for recommended actions should be "peer reviewed" by scientists outside WDFW. This doesn't seem much different than what is in the draft plan.

The workshop should include working with a private property owner and better understanding the effects that damage done by wildlife does on his livelihood. Actually some of the workshops have included this theme.

"Their continued education and training is paramount to keeping with the ever changing conditions of this state and its wildlife." Thank you for your support of this objective and strategy.

This is excellent, and should be required professional development for any such personnel. Thank you for your comment and support for this objective.

"What are parameters for deciding what constitutes a workshop that's relevant? What will they do after attending the seminar/workshop? How will they share what they've learned with peers? Define "professional"." These are all good questions and ones that all good supervisors would ask of their subordinates applying to attend a workshop. In WDFW there are multiple approvals required to ensure that the workshop is appropriate and worth the investment.

"Whatever is necessary for our managers to be at the cutting edge of current understandings on the management of our wildlife." Thank you for your support of this objective and strategy.

Wildlife managers at every level within the agency should attend a minimum of one professional seminar, workshop, or professional society conference annually. Staying current on technical and policy issues is crucial. Thank you for your support of this objective and strategy.

Yes and the Game Commissioners should have to attend as well. Thank you for your support of this objective and strategy.

"Yes, continuing education should be a requirement." Thank you for your support of this objective and strategy.

"Yes, definitively." Thank you for your support of this objective and strategy.

"(2 comments) Yes they should." Thank you for your support of this objective and strategy.

Yes, but it need not be far away places, you can put on in-house seminars by bringing in experts in the their field and getting new science to individuals by staying home. There appears to be much more support for this objective than opposition.

"Yes, continuing education is beneficial to all involved." Thank you for your support of this objective and strategy.

"Some comments Yes, it is important that all professionals take advantage of continuing education to stay abreast of new developments and techniques in their fields. actually they should go hunting with their constituents." Thank you for your support of this objective and strategy.

"P 18 "Science is the core of wildlife management, the basis for achieving the agency’s mandate, and the foundation of this plan." This is not a definable statement when we see the Dept making plans on the DEIS." This Game Management Plan does not suggest a hunting season, only to begin developing a plan to address wolf management once they are no longer listed.

Objective 2: Provide three opportunities for stakeholders to participate in development of three-year regulation packages, collection of biological information, and in planning efforts for game species.

PUBLIC COMMENT

While we followed the rules for public comment periods for an SEIS, we understand that 30 days may not be enough time to digest every aspect of this plan. Although we received comments from over 1600 individuals. The Game Management Advisory Council did help develop new initiatives and discuss the major new issues. Many items in the GMP had only minor changes from the previous plan. We will take the time necessary to address the comments received and work to make edits that are necessary before asking the commission to adopt the plan.

WDFW RESPONSE

We are managing wildlife for the citizens of Washington, they are the public trust and they have a variety of values and views on wildlife management.

In recent years under the guidance of the Game Management Plan, we have done a better job of outreach. We maintain email lists, use the Internet and electronic forms of taking comments, advisory groups, along with the traditional outreach means of news releases and public meetings. That’s why we received comments from over 1600 individuals.
Public meetings, including the Olympic Peninsula. 2. Webinars. 3. Group participation that include hunters, game managers, and wildlife groups.

Actual land owners and private property owners should have a priority position at the table over non property owners when it comes to decisions that will affect the use of private property by the states wildlife (especially when it comes to damage control) any person and entity that does not share in the cost of the damage done by wildlife (or feel the effects of such damage) shall not be considered a stakeholder for consideration. (to put it another way those with the most direct effect of damage caused by wildlife should have the most say as a stake holders then those that have little or no damage affecting them.)

Private land supports wildlife by providing important habitat. Landowners certainly have much at stake with wildlife on their property and their views weigh heavily in Department decisions. The Commission guidelines on page 3 point to this consideration.

At a minimum - prefer more opportunities

At least 3. More if time and budget allow

Best consensus science is the proper way to manage species. We agree, and peer reviews usually help decision makers understand the science necessary to help them with their decisions.

Citizen advisory councils (HE OMCAC) have lost their value and in most cases no longer represent the average hunter. It has become a lobbyists group for special interest. More weight should be put on public meetings and web surveys.

Definitely, there is no reason that

Depends on what is considered a stakeholder

We have modified the objective to add "interested public." Two or more.

Good idea.

Having more meeting dates and locations near where damage and conflicts occur at a time when land owners and working people can attend would be helpful. Instead of requiring a landowner or working hunters to travel to Ellensburg or Spokane to discuss seasons, damage and wildlife issues in Western Washington, have more local meetings.

I think it is important to define "game species" as excluding all predators, whether they be raptors, cougars, or wolves.

If this means license holder's by all means. If Not then this question is not clear

Animal health surveys, hunting, and public meetings. (2 comments)

Stakeholders must include the public at large. Add 1% they improve a hunter of fishermans chances based on harvest records reported to WDFW.

Provide at least one in each administrative region, not just 3 statewide. Question not worded very well.

Public meetings, citizen science projects, youth research involvement

Seems a reasonable among of time.

I've lived in Clarkston Washington for 5 years now and have hunted every year. There are a few things we need to change. First off a lot of us sportsmen and women down here in SE WA think Muzzle loader season should be after rifle season give them a November hunt, if you guys keep muzzle loader season before rifle season then we should have two weeks to hunt in oct for rifle.

Yes. Particularly affected landowners and livestock owners.

We agree. Thank you for your comment and support for this objective and strategies.
The term stakeholder is not identified in this document. If stakeholder implies hunters management. Accept the role of hunters (either Tribal or State) in society and the benefits they provide for parameters should be stricken, it only opens the door for special interests who don't recognize or limitations in habitat, but predator objectives are not prey based. For example, the cougar management strategy in this document has been developed to maximize potential cougar numbers on the landscape but little effort is made to consider a balance between cougar numbers, available prey, and human needs from hunting. Currently, the WDFW's cougar management plan is dramatically flawed. It appears that this same approach is being applied to wolves.

2) Management of predators to benefit prey populations will be considered when there is evidence that predation is a significant factor inhibiting the ability of a prey population to attain population management objectives. For example, when a prey population is below population objective and other actions to increase prey numbers such as hunting reductions, habitat enhancements, or other actions to achieve ungulate population objectives have already been implemented, and predation continues to be a limiting factor. In these cases, predator-management actions would be directed at individuals or populations depending on scientific evidence and would include assessments of population levels, habitat factors, disease, etc (page 20).

This entire guiding principle is unrealistic and counterproductive to hunters and prey species. By providing a significant number of hoops to jump through prior to any action addressing predator management. The GMP cites major voids in data regarding population size for Black-tailed and White-tailed deer, moose, and some elk herds. Without any baseline information on population size there is no mechanism to even identify if a particular population is below management objectives. It is interesting that hunting reductions are the first course of action which seems to assume that overhunting would be the primary agent of population decline. Habitat manipulations are not populated to increase population numbers. The WDFW has no authority to mandate manipulation of habitat on private property, federal lands have management goals that are not consistent with maximizing ungulate populations, and the scale of habitat manipulation required to be meaningful would need to be extremely large in scale and of high quality. This guiding principle as written guarantees that predator population size manipulations would not occur. We believe the WDFW needs to adhere to its Legislative mandates.

We recommend re-writing this section to read as follows “Management of predators to conserve the wildlife in a manner that does not impair the resource while maximizing the public recreation-providing hunting opportunities for all citizens”

3) Affected co-managers and stakeholders should be consulted prior to taking significant actions (page 20).

The term stakeholder is not identified in this document. If stakeholder implies hunters who are the basis for all game management and the majority of funding in Washington, then fine. It if implies “special interests” who don't accept the role of hunting in society and who represent a small minority opinion then it just sets the stage for more inaction in terms of addressing predator/prey interactions.

4) Conservation, economic, recreational, and societal values will be considered (page 20).

We are concerned that some individuals may interpret “societal values” differently than wildlife managers, thus making it extremely difficult for the WDFW to manage wildlife. We believe that the vocal 7% of the population opposed to hunting as highlighted thus the 2014 WDFW opinion survey should not drive management decisions. Again please refer to the WDFW Legislative mandates.

6) Decisions will be based on scientific principles and evaluated by WDFW and an external scientific review panel of experts in predator-prey ecology in terms of risk to all affected wildlife species and habitat (page 20).

The term “risk” is not defined. Does the WDFW have external scientific review panels for elk, deer and big horn sheep? The WDFW already have skilled and highly educated biologists who can make decisions in the best interest of Washington and the hunters/consumers that represent. The potential for bias to influence decisions is high if a panel member has only studied predators and not prey, have assessed interactions in landscapes, predator numbers, and ungulate populations that differ from Washington, this sets the stage to be particularly problematic.

The science developed to date on cougars has been conducted by pro-predator biologists and the outcome has been to protect cougars at a very high population level. This same science is being developed to protect wolves to the detriment of hunters, livestock producers and rural residents.

We try to make it clear that even with deer and elk, social tolerance is often a major factor in our population objective along with any habitat constraints. If we see something that leads us to believe there is an imbalance, we would address it through these predator/prey strategies. Otherwise by managing for stability, we assume that prey numbers are adequate to support the predator population.

Again, when working through the strategies under this objective, we would use available data to determine if we suspect a situation where a predator is limiting a prey species. Hunting reductions are initiated first, because most studies show that for the main mortality source for deer and elk is hunting.

The strategies do not require habitat manipulation prior to recommending management action to remove predators. In Principle 2, it says that evidence of predation being a significant factor includes when other actions have already been implemented such as habitat enhancements.

In terms of consulting with Co-managers and stakeholders; Co-managers means Tribes, Federal Agencies, etc., and stakeholders generally means someone with a vested interest in a matter. In this case it could include citizens with a variety of perspectives that we would consult with, not just hunters.

Thank you for your expression of confidence in Department staff. Having experts outside of the Department creates a good check and balance on decisions. As stated, this peer review would be used to assess risks to wildlife species and habitats from the proposed action.

We will take another look at the language for this objective.

**Objective 3:** Implement the following guidelines for predator-prey management.

**PUBLIC COMMENT**

**GUIDING PRINCIPLES** (page 20)

- WDFW will consider predator-prey management actions using the following guiding principles:
  1. Predator and prey populations are managed to ensure the long-term perpetuation of each species while attaining individual species population objectives (page 20).
  2. Habitat manipulation may be misleading. It was merely intended to show that it is critical to understand and address social parameters is an important aspect of wildlife management.

**WDWF RESPONSE**

We try to make it clear that even with deer and elk, social tolerance is often a major factor in our population objective along with any habitat constraints. If we see something that leads us to believe there is an imbalance, we would address it through these predator/prey strategies. Otherwise by managing for stability, we assume that prey numbers are adequate to support the predator population.

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Thank you for your expression of confidence in Department staff. Having experts outside of the Department creates a good check and balance on decisions. As stated, this peer review would be used to assess risks to wildlife species and habitats from the proposed action.

We will take another look at the language for this objective.
Need to take all predators into account and stop dragging feet of biologists in determining what predator is causing damage to prey species. Washington has fairly liberal hunting seasons on predators, because we are not impacting them at a population level. If we were to take action designed to reduce a predator population, it would take considerable time, effort, and resources. In order to justify that effort and expense, we should understand the likelihood of success and focus on the right cause and the right predator if they are the cause.

No, by the time you go thru all those hoops it causes more population decline. Decisions and actions need to be faster. How much benefit to the economy have the predator’s been? See previous responses regarding taking action without understanding the relative potential for success. Wildlife benefits and value are measured in multiple ways including ecological rather than just economic.

None of the above. Stop wolves way before any cuts in hunting access is needed. We the hunters pay more for the increase in deer and elk numbers. Same as WDFW just folding on recent Shellfish lawsuit filed by conservation organization. You wasted millions of sportsmans dollars throwing away the smiles. This objective and strategies are about black bears, cougars, and coyotes. Wolves continue to be managed under the Wolf Conservation and Management Plan.

Personally I think prey species perpetuation should take priority over predator species so, in #2 above I don't necessarily favor hunting reductions as an automatic action. Same with livestock or animals commercially raised such as cattle ranching. By definition it seems that if the prey numbers are falling below objective the inverse is true and predators must be above. If above the stated objective then the number is faulty and needs to be reevaluated and adjusted to provide equilibrium between the two. We understand your preference for one species over another, but our job is to manage for healthy populations of all wildlife. We think this objective is a responsible way to address the concerns you expressed.

Predator will not long be a “limiting factor” in prey populations, as WDFW should well know. Reduced prey populations will over the longer term limit predator populations (this is Wildlife Biology 101), and “management” of predator populations is unnecessary. Predator-prey relationships are much more complex than you have suggested. It is seldom that a predator only eats one particular prey item.

Predator population objectives should be set based on a scientific evaluation of natural levels and not based on hunting goals. Native predators and prey should be self-regulating in most of the ecosystem. Your comment suggests that predators are always a significant limiting factor for prey populations. Research has shown that predation rarely inhibits prey population trends.

Predator management should be a far consideration when prey numbers drop, along with habitat improvement. Reducing hunter opportunity before predator management is counter-productive to goals seeking to retain hunter participation. Having predator management show up last in your list of actions replaces hunters as a management tool with predators as a management tool. Really, really bad mindset. Determining “natural” levels is difficult because our environment is so dominated by our human population. Regardless of whether you consider humans to be part of what is natural, social values are an important consideration for setting objectives including where deer and elk populations are suppressed due to property damage issues.

Prioritize the economic value of eco-tourism in enhancing the opportunities for non-consumptive enjoyment of viewing our predator species - including bears, wolves, and coyotes. Eco-tourism is important, but hard to evaluate. Washington has a tremendous variety of wildlife and opportunities for tourists. Hunting opportunities enhance the variety of options available for tourists. In addition, hunting does not generally negatively affect other tourism opportunities.

Assumption

c. Implementation can apply across a continuum of predator management strategies ranging from removal of individual or small numbers of animals to population level management across a broad spectrum of geographic scales (from site management to a larger landscape or region). Individual and local population management actions will be addressed as a priority, with “population level” actions considered only when wide scale actions are deemed necessary to sustain prey populations.

We disagree that individual or local population management actions should be the priority as predator control on a small scale is likely not to work or provide only short-term benefits. The conversation should be about management of predator populations at a level that ensures their viability but is in balance with prey across the landscape in Washington. The focus of the predator prey interaction section states that predator population levels have returned to healthy levels across Washington. A natural balance between predator and prey results in stabilization of prey populations which may be below management objectives and serve to not meet human needs for recreational or tribal subsistence hunting. Broad scale reductions in predator numbers that ensure predator perpetuity but maximize human use would provide for an acceptable balance. However, we do recognize the value of small scale reductions in an adaptive management framework to assess responses in ungulate population trend when predatory pressure is reduced. Demonstrating positive benefits from small scale reductions can provide evidence that larger scale efforts are warranted.

Overall Comment: It appears that the approach to predator-prey management outlined in the GMP is incredibly cumbersome. Given the lack of base-line data on many ungulate populations, requirement to implement substantial habitat improvements, and other issue highlighted in our comments, it appears any meaningful actions being taken are doubtful.

REDUCTION OF PREDATORS SHOULD TAKE PLACE BEFORE REDUCTION OF HUNTING.

We need to control predator numbers they are at an all time high due to the limitations put on hunting, trapping, and hunting. The cougars, bears, and coyotes are devastation our deer and elk herds in southwest Washington and need to be controlled. We should have a spring bear hunt. Most every other state in the west has a spring bear hunt to help control bear populations. Bears are much more responsible for killing elk calves and deer fawns than people realize. To have a balanced ecosystem with regards to predator prey relationships we must control the predator populations or we will continue to have predator over populations and deer and elk herds will not be able to rebound from the hair loss disease that hit the blacktail deer so hard and the hoof rot that is currently devastating our elk herds.

The elk herds in southwest Washington are the St Helens and Willapa Hills. Both herds are very healthy and among the largest in the state. Hunter harvest success for elk and black-tailed deer is also among the highest in the state, so it is difficult to understand your statement about devastation.

If and when we do have a problem, we will use this objective to determine a course of action.

“Stakeholders” need to understand that predators are a part of the landscape. WDFW needs to follow the above science available and not be swayed by the politics of predator issues. I think we do that pretty well and it is consistent with our mandate from the Legislature. However, we are a public agency and only manage wildlife on their behalf. It is important for the agency to listen to them and address their concerns as best we can.

#2 is unacceptable. Let the wolf/couyote eat or eat? It passes no common sense test in my mind. If you mean limiting coyote (et al) hunting then I have no objection. It needs to be very clear what hunting reductions you are contemplating.

#2. Management should happen ALONGSIDE other actions NOT after. Hunting opportunity should not suffer MORE than predator group. Most studies have shown that human cause the most significant level of mortality in deer and elk. That is the reason that changing a hunting strategy, usually reducing the harvest of females, often produces the most dramatic results. If reducing the number of females taken by hunters does not change the population trend, then other factors would need to be addressed including predators.

#2. I disagree that “hunting reductions” should have “already been implemented” before “predator management actions” are taken. Ungulate populations have already been severely impacted by wolf predation, in North Eastern Washington. I believe action should be taken immediately, to limit the population of these predators.

We understand that there have been concerns expressed about the potential for wolves to impact ungulate populations. However, we have no indication that is occurring at this time. There is actually an increasing trend to harvest levels and hunter success for deer, elk, and/or moose in northeast Washington. This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

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(9 comments) Agree

I agree with all objectives. For objective 7, please make sure that predators effects, such as cougar kill of ungulates vs wolf kill of ungulates is clearly identified and quantified, and that this information is transmitted to the public. Thank you for your support of this objective and strategies.

(2 comments) I agreed with all the numbers of cougar and bear are up in many of the north eastern units and should be look at. Thank you for your support of this objective and strategies.

I believe that the taxpayers of America should be included in the form of a vote on what should be done or a vote to approve or not any proposed actions on predator management. Thank you for your support of this objective and strategies.

I have no reasonable expectation WDFW has the ability to react quickly enough to effectively manage the predator-prey issue. I'm fully convinced prey species will be effected in a negative way resulting in major effects on available harvest opportunities before the WDFW will move on the issue. Because of the nature of predator prey interactions as well as the contentiousness of the issue, it is important to propose and take actions in a very thoughtful and deliberate manner.

I would suggest being very careful on this subject. Thank you for your comment.

If predators affect populations of Big Game and it threatens the number of permits issued for Big Game, populations of predators needs to be addressed. Predator impacts on prey populations are exactly what this objective is about.

If ranchers who use public lands do not, will not, and can not be documented as NOF participating is restoration of wolf populations. AND do not control the safety of their livestock while preserving the wildlife populations...should irrevocably, and without possibility of appeal, lose their rights to use public lands in perpetuity? The use of public lands is outside of the scope of this objective.

In regards to point 6, I suggest that the wording be changed to "best available scientific principles as related to the geographical area, ecosystem, demographics, and species evolved". "Best scientific principles" are not universal to all situations! In addition, all tools should be considered in reaching the management goals. Presently your hands are tied in some respect because of the lobbying effort of some groups and by state laws. The laws should be reviewed (e.g., use of dogs while hunting cat and bear etc.) and altered if required to provide the Department as much flexibility in meeting their management goals.

I believe that predators control or human population control...take your pick. Thank you for your comment.

Let predator populations return to balance. Black bear, cougar, and coyotes are considered at some level of balance in that our management strategies are not limiting their numbers over a large geographic scale. In terms of social values, if wolves are important (which Washington residents suggested they are), then everyone should share in the "costs" of having them present on the landscape. Ranchers are like any other business; they will implement the most effective ways of getting their product to the market. Prevention of wolf attacks on their livestock is important regardless if that is through non-lethal preventative measures or lethal removal of wolves that repeatedly kill livestock. The State’s Wolf Conservation and Management Plan addresses these issues well and killing wolves is a last resort.

No its just fine the way it is. Thank you for your support of this objective and strategies.

Not sure that having all types of predators evenly distributed around the state is good. Thank you for your support of this objective and strategies.
Now that the "Cat (or dog) is out of the bag" - No action is Not management. These animals must be adequately monitored and managed.

Objective 2.2 should also include scientifically significant considerations for the predator population regarding its own benefit upon the ecosphere as a whole. This objective and strategies are about black bears, cougars, and coyotes. Wolves continue to be managed under the Wolf Conservation and Management Plan.

Comment: Okay

You're welcome for your support of this objective and strategies.

Only as a last resort should any game animal, predator or otherwise, be taken by any other method than a licensed state hunter. Landowners complaining of damage due to game species (bear, cougar, elk, deer etc) must allow licensed hunters free access during state seasons to receive a damage permit. With fees being instituted by large landowners, they may want to boost elk/deer numbers to boost market sales or prices and want to keep predator numbers low, so they could lobby for damage permits--perhaps claiming "timber" damage to reduce bear numbers and increase deer on their property.

We understand your perspective, timber damage is covered under a different set of objectives and access to hunters is a consideration.

Please stop the import and release of predators (wolves) unless you plan to also allow the increase of all prey species to repopulate or import as well. Okanogan area elk beards should be allowed to increase in population or additional animals imported to the region to reduce the potential impact on other species.

Wolves were not imported into the state, they recolonized on their own. Your recommendation for expanding elk into western Okanogan County should be in the elk section. This will be contentious because of potential impacts to the mule deer population.

Population management objectives has nothing to do with species perpetuation, and everything to do with hunting and selling tags.

We don't agree with your perspective. As described in the strategies, species perpetuation trumps all other decisions.

Predator populations should not be managed to serve political purposes and should only be managed when prey populations fall to listing levels.

There appears to be pretty good support for managing predator populations before they cause such a decline in a prey population that it needs to be listed.

Prey 'population management objectives' must not be developed in isolation from larger societal values, including the irony that we contemplate killing many of the several hundred wolves in Washington, so that we, another social predator numbering well over 6 million in Washington, can kill and eat more cedars. I hold this position as a serious deer hunter myself.

We will consider societal values as described in this and other objectives.

Priority for action to guide principles and management of predator/prey should be established to A) conservation; B) recreational; C) societal; D) economic.

Thank you for your comment.

Protecting wolves until they reach recovery, and preventing their re-extirpation is very important.

That is the reason for Principle #6.

Public may not accept necessary predator-prey management actions but its generally a good idea.

Thank you for your support.

You are right that some people who are interested in management decisions have more invested than others.

Stop predation long before hunting cuts have to be made. We the hunters have paid to bring back deer and elk. Do not allow predators, your key word for wolves to get numbers to hurt deer and elk numbers. Stop wolves now.

This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

We understand your perspective, timber damage is covered under a different set of objectives and access to hunters is a consideration.

Stakeholders that actually use the resources and contribute to the resources via organizations like DU and RMEF and hunting licenses should have a larger say than emotional Dick and Jane Doe. Public Education needs to highlight the contributions that user groups give.

We understand the importance for Principle #6.

Stop predation long before hunting cuts have to be made. We the hunters have paid to bring back deer and elk. Do not allow predators, your key word for wolves to get numbers to hurt deer and elk numbers. Stop wolves now.

This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

We may be right, but using this plan of action should help.

Sound conceptual plan. Initiation and execution of this sound plan will be challenging.

This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

We understand the importance for Principle #6.

You are right that some people who are interested in management decisions have more invested than others.

Substantive 3) co-managers such as local native tribes or Federal Agencies but not special interest groups.

We think it is important to consult with known stakeholders as well.

The department should have had prey population data in place before the wolf plan was adopted so that years would not have to be wasted on surveys to see if prey populations are having trouble. Why are hunting reductions the first choice to manage population problems, why not target predators first, or is the WDFW going to deny the idea that predators could be affecting prey populations to please the groups like Conservation Northwest and the Defenders of wildlife that are not well understood that predators killed prey and that they compete with other predators for prey. The difference from a management perspective is trying to keep things in balance from a social perspective. Deer numbers are increasing in NE Washington after killing predators during the severe winters of 2007 & 2008. Killing predators during that recovery might or might not have sped the recovery. Even in your example, where cougars have killed several wolves, the wolf population continues to grow.

Hunting opportunities for cougars and bears in NE especially have changed significantly during that time period and most recently have been even more liberal season length or permit levels.

This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

Thank you for your support of this objective and strategies.

The department has been struggling to increase for the last 10 yrs, WDFW not only needs to address B-D, F-D, H-C etc., ratios. Even if you get these 8% in line (which there not your missing the bigger picture of increasing the total population. Citizen science (People in the wilderness) have been helping the Dept for years surtout to many of the predators. Cougars-Wolves-Coyotes your game management objective states "Management of predators to benefit prey populations will be considered when there is evidence that predators is a significant factor inhibiting the ability of a prey population to attain population management objectives. Predators are a significant factor in increasing the ungulate populations. Cougars have killed 3 of 9 or 10 collared wolves in N.E. Wa. That 33% that's significant. It's time to harvest more bears & cougars.

This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

We don't agree with your perspective. As described in the strategies, species perpetuation trumps all other decisions.

The re-introduction of the Canadian Grey Wolf to our area is a huge mistake. Wolves put wildlife, pets, and the public at risk. We spent over 100 years eradicating these predators from our region because of the previous reasons.

You may be right, but using this plan of action should help.

The reintroduction of wolves based on "scientific" data was a mistake. Any plan for the future should work for minimization of their impact.

Thank you for your comment, we are managing wolves based on the Wolf Conservation and Management Plan adopted by the Commission after extensive review and comment from the public.

The reintroduction of wolves based on scientific data was a mistake. Any plan for the future should work for minimization of their impact.

Thank you for your comment, we are managing wolves based on the Wolf Conservation and Management Plan adopted by the Commission after extensive review and comment from the public.

The trophic effects of top predators should be seriously considered.

That would come under Principles 4 & 6.

There is no room for wolves in this state. Start a liberal and robust season immediately to kill them all.

Thank you for your comment, we are managing wolves based on the Wolf Conservation and Management Plan adopted by the Commission after extensive review and comment from the public.

This decisions should only be based on sound science as performed by outside researchers who do not have a stake in the process. Good, sound science.

That is the reason for Principle #6.

This is a sound procedure.

Thank you for your support of this objective and strategies.
This is a very reactionary approach. WA has the most restrictive hunting regulations of the surrounding NW states and consistently lacks resources to maintain its wildlife objectives. It is much easier to change rules/laws affecting when, where, how, to hunt as well as bag limits. Although managers can set policies for managing predators, it is a challenging proposition. Predators will not wait for stakeholder decisions as to next steps for predator management. They will do what comes naturally, and eat till exhaustion of the food source then move on to another location. Hungry predators will respect demographically established boundaries, where they are hungry farms and playgrounds may be a better prospect than traveling over the next hill: one which a city may be on the other side of. This objective is flawed from the beginning as it seeks to manage something within a very small geographic area with very few resources to do it.

This program should disclose all the costs involved in managing these species and who is presently paying the bill. That is identified under strategy c35.

This sounds like a thorny, carefully designed process with ample input available from citizens, stakeholders and conservation groups. Please continue to stick with this plan. Thank you for your support of this objective and strategies.

Trap and release surplus wolves and coyotes in King and Pierce counties. Thank you for your comment.

Use long term population trends. Before lethal predator control, make sure the prey species population decline is consistent over several years. The sure to exhaust all other causes that can be controlled, including reduction of quota or hunting altogether (temporarily). Strongly consider relocation of predators that have been deemed to be causing significant population decline.

Use the 50% success rate for hunting and fishing. If I can’t take my kids hunting and fishing and catch or harvest something in 3 years when in the past the same tactics worked then you have a problem. I’ve been all over the IS and the woods in the SW Washington almost seem devoid of large game.

We do not want wolves. PERIOD!!!!

We need to open up hunting for coyaters I don’t think we can properly manage them other wise. Wolves should be just like coyotes, if you see them shoot them (off all is legal)

We did make several edits to the language in this section to clarify that wolves are being identified in the Plan. We have made some additional edits to make this more clear.

When considering predator-prey management remember; Homo sapiens is also a predatory species. While I don't support the elimination of any species, I do believe some species of predators have been placed on a pedestal, a placement that may very well be to the detriment of the prey species and other predators. Currently we are attempting to manage some predators as if it were 150 years ago. We should manage predators in a manner consistent with having almost 7 million people living in Washington. There appears to be a movement by some to take man out of the equation for managing predators, they seem to have forgotten (or never knew) that the vast number of ungulates we have, wouldn’t be here if it weren’t for the efforts and dollars of man the predator!

When the time comes don’t forget that hunters are stakeholders. They certainly are!

These rules are all important. You really need to add a Spring Bear Season due to the Bear predate factor to elk and deer fawns as well as timber damage.

Yes, as long as “scientific principles” are not used at the expense of this basic truth: HUMANS COME FIRST, THEN ANIMALS!

Recovery objectives have not yet been met, and the Department indicates they are not expected to be met until 2021 at the earliest. No public process has yet taken place to solicit information and comments on how wolves should be designated at that time. The stated purpose of the GMP is to develop a plan for managing wolves after they have met delisting objectives. Resources invested in the Game Program transferred management authority over wolves from the Endangered Species Section, Wildlife Diversity Division, to the Game Division. It did so despite the fact that the Wolf Plan was developed under the auspices of the Endangered Species Section, the wolf currently is state-listed as an endangered species, and there is no policy requiring the transfer, nor precedent for transferring management of an endangered species to the Game Division. Washington’s wildlife is held in trust for all of Washington’s residents, not simply those who wish to hunt them. The Department’s premature and inappropriate push to designate wolves as a huntable game species and its efforts to steer wolf management in this direction long before wolf recovery goals for the state have been met are not in keeping with the wishes of the vast majority of Washington residents. Clearly, the designation of wolves as game animals is not a given. As the GMP notes at p. 23, under current Washington law, potential designations include “protected,” “game animal,” or “unclassified.” Recovery objectives have not yet been met, and the Department indicates they are not expected to be met until 2021 at the earliest. No public process has yet taken place to solicit information and comments on how wolves should be designated at that time. The stated purpose of the GMP is to address management of hunted game species. It is inappropriate to include wolves, a nongame, unclassified, endangered species, in this 2015-2021 GMP SEIS. It is also inappropriate for wolves to be managed under the Game Division, which views wolves through a game species management lens. Nothing could make this more obvious than the fact that wolves have been included in this draft SEIS for game species as well as the Department’s online survey for the 2015-2017 Hunting Regulations. Last week, upon receiving complaints about wolves being included in the Hunting Regulations survey – since wolves are not a huntable species – the Department deleted the list of species included in the survey. The Department indicated that wolves were included by mistake, but this is a mistake that does not reflect well on the WDFW but to my knowledge our efforts have never been reciprocated either by the Enforcement ownership category.

The Dept appears to narrowly define both “management” and “recreational opportunity” as killing wildlife. The DSEIS would benefit from clarity.

“Interactions per capita” is not a meaningful statistic for management. We do not want wolves PERIOD!!!!

There are over 200,000 SFWs with over 5 million forested acres that should be considered significant “stakeholders.” Some of us have appeared before the Commission and reached out to WDFW but to my knowledge our efforts have never been reciprocated either by the Enforcement agencies or the “society” folks don’t understand that “economic” is the lynch pin for all the other values. When I or my heirs finally succeed to the conversion pressures and the talks/coercive/insensitive efforts for conversion, recreational, & societal values all the private critter habitat will be gone. We have to have at least the illusion of “profit” to continue providing all the public & critter benefits.

Objective 4: Develop a plan for how wolves will be managed after recovery objectives have been achieved.

PUBLIC COMMENT

Wolves Should Not Be Managed Under the Game Program

Following adoption of the Wolf Plan in 2011, the Washington Department of Fish and Wildlife (Department) transferred management authority over wolves from the Endangered Species Section, Wildlife Diversity Division, to the Game Division. It did so despite the fact that the Wolf Plan was developed under the auspices of the Endangered Species Section, the wolf currently is state-listed as an endangered species, and there is no policy requiring the transfer, nor precedent for transferring management of an endangered species to the Game Division. Washington’s wildlife is held in trust for all of Washington’s residents, not simply those who wish to hunt them. This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

While the GMP notes at p. 23, under current Washington law, potential designations include “protected,” “game animal,” or “unclassified.” Recovery objectives have not yet been met, and the Department indicates they are not expected to be met until 2021 at the earliest. No public process has yet taken place to solicit information and comments on how wolves should be designated at that time. The stated purpose of the GMP is to develop a plan for managing wolves after they have met delisting objectives. Resources invested in the Game Program transferred management authority over wolves from the Endangered Species Section, Wildlife Diversity Division, to the Game Division. It did so despite the fact that the Wolf Plan was developed under the auspices of the Endangered Species Section, the wolf currently is state-listed as an endangered species, and there is no policy requiring the transfer, nor precedent for transferring management of an endangered species to the Game Division. Washington’s wildlife is held in trust for all of Washington’s residents, not simply those who wish to hunt them. This strategy is specific to black bear, cougar, and coyote at this point. Wolf impacts on ungulates are covered under the Wolf Conservation and Management Plan.

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As stated in this game management plan, wolves will be managed under the state’s Wolf Conservation and Management Plan (Plan) until they reach the recovery objectives identified in the Plan. We have made some additional edits to make this more clear.

The reason wolves have been identified by the public as important to management of game species is because of the concern of their potential impacts to game species, especially deer, elk, and moose.

We did make several edits to the language in this section to clarify that wolves are being addressed in the Wolf Plan. We have made some additional edits to make this more clear.

As stated in this game management plan, wolves will be managed under the state’s Wolf Conservation and Management Plan (Plan) until they reach the recovery objectives identified in the Plan. We have made some additional edits to make this more clear.

We did make several edits to the language in this section to clarify that wolves are being addressed in the Wolf Plan. We have made some additional edits to make this more clear.

While we make that statement, we also provide additional information about the relative public support for hunting of wolves and the statement made on page 70 of the Wolf Plan that the Department would most likely recommend that wolves be classified as a game species. We hope that helps with the understanding of why wolves are addressed in this Game Management Plan.

Wolves management brings with it a whole different level of public interest, scrutiny of decisions, and challenges compared to other wildlife issues. It took five years to develop the Wolf Conservation and Management Plan, it will likely take at least as long to develop a plan for managing wolves after they have met delisting objectives. Resources invested in the game program were not likely to be used to develop a plan for managing wolves after they have met delisting objectives. Resources invested in the game program would likely be used to develop a plan for managing wolves after they have met delisting objectives.

As described in both the Wolf Conservation and Management Plan and this draft Game Management Plan, de-listing and future classification of wolves by the Department will...
Department’s intentions. If any members of the public did submit comments about wolves in the 2015-2017 Hunting Regulations survey, it is incumbent upon the Department to delete any wolf related comments (or if they cannot be deleted, the Department must not use the wolf-related comments for any purpose).

A. Wolf Populations are Self-Regulating and Don’t Need to be Managed via Hunting. We support the protection of wolves in Washington because they are an unclassified species. It does them being an unclassified species.

Protected species was not a commission directive and has no place in document and neither management to balance recreational hunting needs and ungulate populations with wolf numbers. This should be the sole objective to be consistent with Commission policy. Being a protected species was not a commission directive and has no place in document and neither does them being an unclassified species.

Additionally, the language used by Commissioner (Policy Statement April 13, 2012 and letter to legislators, January 13, 2012) does not include any indication that the recovery plan was being developed for anything Jess than classifying them as game animals to facilitate state legislative, January 13, 2012) does not include any indication that the recovery plan was being developed for anything Jess than classifying them as game animals to facilitate state

3. We request that the existing draft language be replaced with the following language:

<table>
<thead>
<tr>
<th>Line</th>
<th>Original Draft</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>1. Protected: Meaning they would not be hunted but could be lethally removed under certain conditions.</td>
<td>We did make several changes to the language to clarify that a plan for managing wolves after they have met recovery objectives does not presuppose that they will be classified as a game species. We also provided information from the wolf plan and the Commission’s policy statement indicating that the Department has stated that we anticipate recommending game status for wolves.</td>
</tr>
<tr>
<td>2.</td>
<td>2. Game animal: Meaning they can only be hunted under rules created by the Commission.</td>
<td>We will consider some of your language changes in the next draft of the Game Management Plan.</td>
</tr>
<tr>
<td>3.</td>
<td>3. Un-classified: Meaning they are not protected but could be lethally removed under certain conditions.</td>
<td></td>
</tr>
<tr>
<td>5.</td>
<td>Continue to manage wolves under the Wolf Conservation and Management Plan to achieve recovery and allow for delisting and re-classification.</td>
<td></td>
</tr>
</tbody>
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We have conducted several outreach efforts but need to do more. We brought in wolf experts from the Rocky Mountains and they described what some states have experienced in terms of wolf impacts to prey species and hunting. Hundreds of people have viewed that video since it has been available on our web site.

As this objective states, we are planning to develop a plan for managing wolves after they are delisted. Based on our projections we have several years to complete a plan.

The inadvertent placement of wolves in the survey of opinions about the 2015-17 hunting seasons will not be used and a clarification of the error will be posted on our web site when we summarize the survey.

It appears that your concept of self-regulating would include a variety of mechanisms that are essentially true for most wildlife species. In theory, wildlife populations will increase until they reach some upper limit usually controlled by environmental factors and then they decline dramatically. Sometimes they level off for a number of years and other times they start the cycle over again.

With hunted species, the intent is to manage these dramatic swings in population increase and crash to maintain a more stable or sustainable population level or balance over time.

Wolves have proven to be very resilient to hunting and are one of the most well distributed (and hunted) species in the world. All of this will be considered and addressed after they have met recovery objectives in Washington.

Wolf populations are self-regulating and do not require management by recreational hunting. Regulatory mechanisms include intraspecific strife and territoriality (Cariappa et al. 2011). Wolves live in extended family units and defend their territories from incursions by other wolves through intraspecific aggression. Intraspecific strife and territoriality are behaviors which are endemic to wolves and may set upper limits on wolf density (id.). Even when wolf density is low and food plentiful, fatal intraspecific attacks are known to occur (Fritts and Mech 1981; Wydevan et al. 1995). In response to scarce food resources, wolf packs expand the size of their pack territory (Jedrzejewski et al. 2007; Wydevan et al. 1995). Hunting of wolves would interfere with this natural response. Stochastic events, such as incidents of disease, can have significant impacts on wolf populations, as well. In Yellowstone National Park, the annual Wolf Project reports have repeatedly demonstrated years (e.g., 1999, 2005 and 2008) where there were substantial declines in pup survival and the wolf population due to disease. In short, the science demonstrates that natural regulating mechanisms operate within wolf populations. Recreational hunting of the species to regulate wolf populations is unjustified. Our comments pertain to the inclusion of wolves in this plan. The original EIS to which this draft SEIS is tiered contains purpose and need language geared exclusively to the management of hunted species. Given that the wolf is not a hunted game species, currently has protections under state and federal endangered species laws, and will have a formal status review and re-designation after recovery, the placement and wording of the wolf section in Chapter 2 of the Draft SEIS (pages 22-23) are ambiguous and unnecessarily confusing. We recommend the language be revised to make it clear that a “management plan” for wolves is not being recommended, but that wolves are mentioned in this Game Management Plan only for the purpose of educating the public about the current listed status of the species and the process by which a post delisting plan will be developed once recovery objectives have been met.

We request that the existing draft language be replaced with the following language:

“We support the protection of wolves in Washington because they are an unclassified species. It does them being an unclassified species.

It does them being an unclassified species. It does them being an unclassified species.

They could leave wolves un-classified which would mean they are not protected.

Wolf populations are self-regulating and do not require management by recreational hunting.
I'm curious about the Wolf Recovery "Objective 4". The projected recovery population for wolves set in 2011, and presumably the delisting process will take more than a couple of days, so I wonder why it is urgent to create a post delisting plan at this time?

I can understand trying to get an overview of goals and considerations to help in future planning, however it seems a little premature to attempt to create a perfect plan for something that could be a decade out. A lot could change between now and then, so to the naïve observer it seems like a waste of resources to try to solve this now. Maybe 2018 or so.

Or is this because the plan covers the period of 2020+? Or because it's expected to take 7 years to develop a post-delisting management plan? Or is it because the plan covers the period of 2020+? Or because it's expected to take 7 years to develop a post-delisting management plan for wolves in Washington? We believe that it is premature to develop a post-delisting management plan that assumes they will be a game, hunted species.

As mentioned previously, yes anything associated with wolf management tends to be challenging and draws out. If the history of wolf management in all of the other states with wolves repeats itself, the public process associated with delisting is likely to take many years. Waiting until then to develop a plan for wolf management after they reach delisting objectives might only further delay management.

We have concern about the fact that a post delisting management plan has not been drafted to date. The plan was ratified in 2011 and 3 years later no public draft has been accomplished. The Wolf Advisory Group was supposed to be used to develop this document, but apparently has not been used.

The stated purpose of the Game Management Plan is to address management of hunted game species. Wolves are a state endangered species. Including an objective to develop a management plan for wolves is inappropriate, as well as far outside the purpose of the Wolf Recovery Plan. In addition, such listing is pre-decisional, a waste of public resources. Wolves are a state endangered species. The stated purpose of the Game Management Plan is to address management of hunted game species. Wolves are a state endangered species. As mentioned previously, yes anything associated with wolf management tends to be challenging and draws out. If the history of wolf management in all of the other states with wolves repeats itself, the public process associated with delisting is likely to take many years. Waiting until then to develop a plan for wolf management after they reach delisting objectives might only further delay management.

As stated in this game management plan, wolves will be managed under the state’s Wolf Conservation and Management Plan (Plan) until they reach the recovery objectives identified in the Plan.

The reason that wolves have been identified by the public as important to management of game species is because of the concern of their potential impacts to game species, especially deer, elk, and moose.

We did make several edits to the language in this section to clarify that wolves are being managed under the Wolf Conservation Plan, and that the strategy that identifies the development of a post delisting plan does not pre-suppose that wolves will be hunted. While we make that statement, we also provide additional information about the relative public support for hunting of wolves. Additionally, we state that WDFW is likely to recommend that wolves be classified as game species consistent with page 70 of the Plan. We hope that helps with the understanding of why wolves are addressed in this Game Management Plan.

As stated in this objective, wolves will continue to be managed under the Wolf Conservation and Management Plan. However, it is important to note that the Wolf Plan on page 70 says “After delisting, it is anticipated that the WDFW would recommend listing as a game species.” A recent public opinion survey showed that a large majority of Washington citizens support hunting of wolves to address livestock depredations, maintain wolf population objectives, and to maintain ungulate population objectives.

Several other non-hunted species are mentioned in this plan if either they might affect game species or if game species management might affect them.

We are opposed to having a section in the 2015-2021 Game Management Plan (GMP) that discusses a post-delisting management plan for wolves in Washington. We believe it is premature to assume that wolves will have recovered during the term of the GMR, and that the focus for wolf outreach to the public should be on recovery and the management of wolf-livestock conflicts as stated in the Wolf Conservation and Recovery Plan. If wolves should reach recovery during the 2015–2021 GMP period, the Plan could be amended at that time to discuss the delisting process and possible outcomes.
For species such as wolves which exhibit kin-based social structure, maintenance of their family units experienced unintended effects in the years following (Creel and Rotella, supra). Maintenance of family units will not be immediately apparent in the year that breeding animals are killed, but will have been eliminated, or may be so weakened by the loss of key pack members that they are no longer able to provide stable, regulated recreational hunting opportunity to all citizens, protect and enhance wildlife habitat, and minimize adverse impacts to residents, other wildlife, and the environment (Draft Supplemental Environmental Impact Statement for the 2015 Game Management Plan, WDFW, June 9, 2014). It is inappropriate at this time to include wolves in the GMP. Wolves are currently protected statewide as an endangered species in Washington, and are therefore not a game species, and considered a threatened wildlife species.

Wolves fall into the category of “other significant factors” mainly because of the concern about their potential impact to deer, elk, and moose. We are hesitant to add wolves to this sentence because it would likely be opposed as well.

4. Discussion of post-delisting plans for wolves is remuneration at this time. Chapter 2 of the GMP (page 18) states that “Science is the core of wildlife management, the basis for achieving the agency's mandate, and the foundation of this plan.” Recent WDFW analyses suggest that Washington should reach its recovery goals for wolves in approximately 12 years (2021), at the end of this GMP period. The process for delisting wolves could potentially begin as early as 2021, whereby, reclassification of wolves could also be started. Wolves could be reclassified as game species, protected species or unclassified wildlife during that process. WDFW's own science supports the premature assumption that wolves will recover AND be reclassified as game species during the 2015–2021 GMP timeframe.

Based on what was experienced in the Great Lakes states as well as the Rocky Mountain states, it could take a significant amount of time to go through a process to delist and reclassify, let alone develop a new management plan for wolves. It seems prudent to start soon.

Issue Statement

Once wolf delisting objectives have been achieved, wolves can be considered for down listing or delisting. A population management plan developed by Madsen et al. 2011 has been tracking well with Washington's wolf population growth and predicts that recovery objectives may be reached by 2021(page 22). Once wolf delisting objectives have been achieved, wolves should be delisted, not “can be considered for down listing or delisting”, see Washington State Wolf Plan. If public opinion is to be used, 73% of those surveyed by the WDFW support removing wolves off the State's ESA list once their recovery objectives have been achieved.

“Pursue public acceptance of sustainable ungulate and wolf hunting as a necessary part of managing wildlife and the ecosystems they depend upon”

COMMISSION POSITION STATEMENT: Wolves in Washington April3, 2012 We strongly agree and support the Commission's statement regarding the pursuit of public acceptance in regards to wolf management. We do not believe that the WDFW is pursuing this objective on wolves at this time. There has not been any meaningful outreach to the general public about the importance of managing wolf populations and the impacts that wolves have on ungulates.

Comment:
The language “can be considered for down listing or delisting” has no place in this document. Commission policy statement April 13, 2012 states that once recovery objectives are achieved certain state protections will no longer be necessary. It also states that a majority of state citizens accepted hunting of wolves once they have reached recovery levels. Stresses the impendace of the North American Model of Wildlife Conservation and expresses concerns that potential effects to ungulate populations will impact hunting opportunity and the viability of this model. States as a guideline to pursue public acceptance of sustainable ungulate and wolf harvest as a necessary part of managing wildlife and the ecosystems they depend upon.

The WDFW Commission has stated “to address ongoing issues and concerns, the Commission will begin considering a draft policy statement on “Wolves in Washington”.” The policy will articulate the Commission's stance on the larger issues of how the agency will implement the recovery plan, and how wolves will be managed after they have been delisted. Jan. 3, 2012 letter to Representatives.

“With the recovery plan in place, it is now a priority for the department to begin development of a long term management plan to assure that recovered wolf populations do not cause undue harm to livestock interests, prey populations, and public safety while at the same time ensuring wolf population levels remain above recovery objectives”.

COMMISSION POSITION STATEMENT: Wolves in Washington April13, 2012 Based on the Commissions previous statement and Madsen et al.'s abstract a complete chapter on wolves in Washington should have been included in the WDFW's post delisting management of the wolf in the 2015-2021 Game Management Plan.

Thank you for your comment, wolves have proven to be very resilient to hunting and are one of the most well distributed (and hunted) species in the world. All of this will be considered and addressed after they have met recovery objectives in Washington.

II. Hunting Will Increase Conflicts Rather Than Decrease Them

Recreational hunting of wolves is indiscriminant and can lead to more conflicts, not fewer conflicts. Wolves of all age classes and of both sexes are killed by hunters, in those states with state-sanctioned wolf hunting seasons. Yet, research confirms that which wolves are killed can make a significant difference in pup survival, retention of breeding pairs within a pack, and whether there exist experienced adult members of the pack to teach pups how to hunt wild prey (Brainerd et al. 2008; Creed and Rotella 2010).

In one study, nearly 40% of wolf packs dissolved and abandoned their territories after breeding animals were lost, only 47% of packs that lost a breeder reproduced the following year and only 9% of the packs reproduced after loss of both breeders (Brainerd et al. supra). When the “wrong” wolves are killed, the stage is set for more conflict between wolves and human activities such as livestock production. The pack disruption that occurs when breeders are lost can cause the remaining wolves to scatter or may result in the subdivision of existing wolf territories with the effect of increasing wolf densities locally (Id.). Pack disruption creates more dispersing single wolves that are less able to capture wild ungulate prey on their own and thus may turn to vulnerable livestock or pets. A territorial pack that has not been involved in wolf-livestock conflict may be eliminated, or may be so weakened by the loss of key pack members that they are no longer able to defend their territory from new wolves moving in. The consequences of social disruption of packs will not be immediately apparent in the year that breeding animals are killed, but will have unintended effects in the years following (Creel and Rotella, supra).

For species such as wolves which exhibit kin-based social structure, maintenance of their family units can have fitness benefits; when there is high mortality due to hunting and trapping, however, this natural social structure may be disrupted, with resultant negative impacts on the fitness of the species (Rotella et al. 2010).

Given that the Department is charged with conserving the state’s wildlife species, instituting a hunting season on wolves would reduce the species’ fitness and result in pack disruptions that increase the potential for conflicts. The concept of recreational hunting of wolves to reduce conflicts is fundamentally flawed.

III. Hunting Does Not Decrease Tolerance for Wolves

In states where federal protections for wolves have been removed, aggressive state-sanctioned hunting and trapping of wolves has been instituted. In all instances, the agencies have rationalized recreational hunting and trapping of wolves as helping to promote tolerance for coexisting with...
wolves. Recent studies demonstrate this to be a false premise and that, in fact, the converse is true. Surveys conducted in Wisconsin over the period of 2001-2009 did not support the assumption that hunters would steward wolves; researchers found the majority of hunters unsupportive of wolf conservation (Treves and Martin, 2011). The surveys also showed that likely future hunters in Wisconsin were unsupportive of wolf conservation, and this corresponded with the findings of a prior study which reported that “[U.S.] hunters often hold attitudes and engage in behaviors that are not supportive of broad-based, ecological objectives” (id., citing Holman, 2000).

A longitudinal study conducted in Wisconsin looked at changing attitudes over time of residents, examining attitudes, beliefs, and emotions associated with gray wolves, the inclination to kill wolves illegally, and the approval of management interventions from 2001 to 2009. Data collected from three separate surveys revealed increases in a fear of wolves, a sense of competition with wolves for deer, an inclination to poach wolves, approval of lethal control of wolves involved in livestock and pet attacks, and endorsement of regulated public hunting or trapping of wolves (Treves et al., 2013). “The strongest correlation with increased inclination to poach wolves was competition over deer, an icon of the hunting culture in Wisconsin, not fear or lost domestic animals.” (Id.)

In 2012-2013, Wisconsin held its first legal wolf hunt since assuming wolf management authority from the federal government. During the summer of 2013, a survey was conducted to understand change in attitudes towards wolves among people living inside and outside of wolf range in Wisconsin. Survey participants had previously participated in the three surveys conducted and reported on by Treves in the 2011 and 2013 papers. For people living within wolf range, of those who said in 2009 that their tolerance for wolves would increase if wolves could be hunted, in fact, their stated tolerance for wolves decreased by 18 percent following institution of the first year of wolf-hunting in Wisconsin. Among self-identified hunters in the survey, their stated tolerance for wolves decreased even more -- by 21 percent -- than for non-hunters (Hogberg et al. 2013). As the studies from Wisconsin reveal, state wildlife managers cannot assume that hunting of wolves will lead to more tolerance for wolves. In Wisconsin, wolf tolerance has decreased and unreasonable fears of wolves have increased. The Department should pay heed to the current science which is demonstrating that assumptions about the relationships between hunting of large carnivores and tolerance are unfounded.

5. Wolf angling: population management

General Comment: The WAG has failed to agree on any meaningful input on the above five items. This is due to the composition of the group. 4 out of the 9 seats on the WAG represent organizations that are anti-hunting/anti-management of the wolf. These groups represent 7% of those recently surveyed by the WDFW Opinion Survey 2014 and do not share the same goals of management that livestock and sportman’s groups & the rural community would like to see. If public opinion is to be used 88% of those surveyed by the WDFW Opinion Survey 2014 approve of hunting. For a post delisting management plan to be successfully completed, the WAG should work together and comply with the policy directive of the Commission.

Establish policy and direction for the management of fish and wildlife species (page i 2013-2015 WDFW Strategic Plan).

7. Until wolves are recovered in Washington, WDFW should focus on using its limited financial resources to implement recovery, not starting to develop a post-delisting wolf management plan as proposed in Objective 4 of the GMP. We do not know what the post-delisting classification of wolves will be in another 7-10 years, and what the science will be at that time to help formulate such a plan. It is not possible to know what type of plan will be needed post-delisting because it is unknown whether wolves will be reclassified, as protected wildlife, game species, or unclassified when they are delisted.

We are very focused on recovery and are spending the vast majority of our time on this activity. However, we also feel that it is important to move forward with a plan for managing wolves after they are delisted and have been instructed to do so by our Fish and Wildlife Commission.

The draft SEIS for the 2015-2021 GMP includes discussions and proposals regarding wolves, in Chapter 2, General Game Management Issues, and in the section entitled Wildlife Conflict. This is surprising, since under Washington law, as well as under federal law in the western two-thirds of the state, wolves are classified as an endangered species, not as game animals, and because wolf management and strategies for addressing wolf-related conflicts are already set forth in the Washington Wolf Conservation and Management Plan (Wolf Plan).

Nevertheless the Department has elected to include in the draft SEIS two sections and objectives pertaining to wolves. An objective is proposed, at pp. 22-23 of the draft SEIS, of developing a plan for how wolves will be managed when recovery objectives have been achieved; and a second objective is proposed, at pp. 37-38 and 40 of the draft SEIS, of maintaining or decreasing livestock depredation levels over the period 2015-2021.

The stated purpose of the GMP is to address management of hunted game species. As such, including wolves in the GMP is inappropriate and also misleading to the public since the very inclusion of wolves implies that the species is already a huntable game species.

We are very focused on recovery and are spending the vast majority of our time on this activity. However, we also feel that it is important to move forward with a plan for managing wolves after they are delisted and have been instructed to do so by our Fish and Wildlife Commission.

51 Comments

1. Delete Objective 4 in the “General Game Management Issues” section, on p. 2, which seeks to develop a plan for how wolves will be managed after recovery objectives have been achieved. The stated purpose of the Game Management Plan is to address management of hunted game species. Wolves are a nongame, endangered species – not a hunted game species and should not be included in this Game Management Plan SEIS. WDFW has stated that wolf recovery goals are not expected to be reached until 2021 or later. It is improper and a breach of the public trust to include wolves in this survey.

2. Delete “wolves” in Objective 26 from the “Wildlife Conflict” section, on p. 4, regarding a reporting system for complaints about hunted game species. Wolves are not a hunted game species; they are a state endangered species and should be treated accordingly. The Washington Wolf Conservation and Management Plan already includes strategies for addressing any wolf-related conflicts. The inclusion of wolves in WDFW’s survey and SEIS for its Game Management Plan is simply inappropriate.

3. Washington adopted a Wolf Conservation and Management plan in 2011, which took five years to craft and is the result of substantial public input. The Wolf Plan serves as the state recovery plan intended to guide the management of wolves in Washington until they are recovered. No wolf game management plan is needed during the time period of 2015-2021. The inclusion of wolves in the Wolf Plan serves as the state recovery plan intended to guide the management of wolves in Washington until they are recovered. No wolf game management plan is needed during the time period of 2015-2021. The inclusion of wolves in the Wolf Plan.
survey improperly assumes that wolves will become designated as a hunted game species, even though the state Wolf Plan states that a full public process will take place to determine what status wolves will be given upon reaching recovery goals. WDFW’s inclusion of wolves in its Game Management Plan SEIS survey is also a waste of limited state resources.

4. Washington should adopt a complete ban on lead ammunition for hunting activities in the state. Lead is an extremely toxic metal that we’ve seen removed from water pipes, gasoline, paint and other sources dangerous to people. Yet toxic lead is still entering the food chain through widespread use of lead hunting ammunition and fishing tackle, poisoning wildlife and even threatening children’s health. At least 75 wild bird species in the United States are regularly poisoned by spent lead ammunition. Animals that scavenge on carcasses shot and contaminated with lead bullet fragments, or wading birds that ingest spent lead-shot pellets or lost fishing weights mistaking them for food or grit, can die a painful death from lead poisoning. Others suffer for years from lead’s debilitating effects. As many as 20 million birds and other animals die each year from lead poisoning. Lead ammunition also poses health risks to people. Lead bullets explode and fragment into minute particles in shot game and can spread throughout meat that humans eat. Nearly 10 million hunters, their families and low-income beneficiaries of venison donations may be at risk. A poll conducted in 2013 shows that 57% of American support the ban of non-toxic ammunition for hunting.

We believe that having some language in this section for hunters about how to identify wolves versus coyotes would be very appropriate, and similar to what the current version of the GMP has for grizzly bears in the black bear section. The current plan talks about the need to educate black bear hunters on how to identify and distinguish a black bear from a grizzly bear by providing educational materials, etc. Since wolves are an endangered species, and we are in the early phase of recovery in Washington, it is very important to sensitize as many as possible to an appropriate discussion.

WDFW analyses state that wolves may reach recovery by 2021, at the end of the GMP term. As stated above, even if wolves do reach recovery goals in 2021, there are many public processes which will need to be completed, including potential reclassification, which could result in several outcomes besides game designation, and years away from making wolves a huntable species. We oppose including wolves in Washington's Game Management Plan (GMP) and request that the State not spend time developing a post de-listing plan at this point instead focus on species recovery.

Given that wolves are still federally and state protected species in Washington, it is inappropriate for the Department to refer to them in the Game Management Plan, which is specifically exclusive to hunted species. It is presently unclear when and if wolves will meet recovery objectives in the state, and to include this species in a hunting specific discussion sends the message to the public that wolf hunting is a pre-ordained conclusion. The reason that wolves have been identified by the public as important to management of game species is because of the concern of their potential impacts to game species, especially deer, elk, and moose.

We did make several edits to the language in this section to clarify that wolves are being addressed in the 2015-2021 GMP - not a hunting specific discussion and should not be included in a separate section of the plan with an objective to develop a management plan.

The Wolf Conservation and Management plan serves as the state recovery plan and is intended to guide the management of wolves in Washington while they are listed - through 2021, or later, until they are recovered and delisted. No other wolf management plans are needed during the time period of 2015-2021.

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We also don't know what science will tell us in another 7-10 years to help formulate a plan. It is not possible at this time to use the best available science to develop a post-delisting plan that would not be in effect for nearly a decade at the earliest. That science will not be available until many years into the future, as wolves re-establish in Washington and reach recovery objectives. No reliable science can be developed at this time when the classification of the species is unknown and there is no science to support it.

We request the Department eliminate all mention of wolves in the rendition of the Game Management plan until they reach the recovery objectives identified in the Plan.

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ecology of riparian systems. Most Americans see wolves as an iconic species that should be protected and not exploited. Wolves are important facets of wildlife-watching tourism in the Northern Rocky Mountains. Wildlife watchers drive millions of dollars to the states that host them. Washington needs its wolves fully recovered.

The stated purpose of the GMP is to "guide the Washington Department of Fish and Wildlife's (hereinafter "Department") management of hunted wildlife for the next six years." (Ch. 2, Obj. 4). We believe that including an objective to develop a game management plan for a state-listed, endangered species is highly inappropriate and unprecedented. We respectfully request that gray wolves be removed entirely from the GMP until their recovery is fully reached. Instead, we ask the Department to focus on species recovery as directed in the Wolf Conservation and Management Plan.

Including an endangered species into the GMP based solely on conjecture and projection models is simply irresponsible and lacks scientific integrity. The Department has no scientific certainty that wolves will be recovered by 2021 (GMP pg. 22). To our knowledge, no other state endangered species has ever been included in the Washington GMP before their recovery was reached and a state environmental protection act review conducted that included public participation. Washington's Wolf Conservation and Management Plan already guides the management of wolves while they are recovering. No other plans are currently needed until wolves are recovered. This proposal simply wastes the Department's time and the public's resources. Our State's funds would be better spent on wolf recovery, public outreach and education, developing wildlife-viewing opportunities and developing protocols for non-lethal livestock protection.

To conclude, the Department is premature to include an endangered and barely recovered wolf population in the State's game management planning process. It deprives the rights of citizens to weigh in on what should be a public rule-making process. Wolves are an iconic part of Washington and they should be conserved for future generations.

We believe that this characterization of the wolf population in Washington is misleading. Stating an average growth rate of 30 percent gives the impression that Washington's wolves are zooming along toward recovery. However, we have a ways to go to get all regions to recover. This is particularly relevant when we look at the statistics on wolf numbers for 2013. The proposed language legitimizes misbeliefs that wolves are over-running Washington and we need to do something new about it. We believe that it would be more informative to state where we are today with wolf recovery, and where we need to be to reach recovery.

The pace of growth for Washington has been similar to that experienced in the Rocky Mountain states. That rate of growth since 2007 is over 30%. However, we agree that there is more room to grow before we feel they are secure and sustainable. We did state the current status and recovery objectives in this section.

I don't quite understand why you (Washington Department of Fish & Wildlife) are taking comments on the SEIS (Supplemental Environmental Impact Statement) for the 2015-2021 Game Management Plan to develop a “management plan for wolves after they are delisted”. As you’re aware, wolves are a state and federal “endangered species” and will likely not even reach state recovery goals until about 2020/2021.

It appears to me that your (WDFW) intention is that the wolves will be a hunted species – leaving “the people” out of any decision making regarding the future of these magnificent animals. No other wolf management plans are needed during the time period of 2015 - 2021. Accordingly, the Wolf Conservation and Management plan serves as the state recovery plan and is intended to guide the management of wolves in Washington while they are listed - through 2021, or later, until they are recovered and delisted.

I think its time for the WDFW to focus on implementing a recovery program until wolves are delisted. You are wasting valuable state financial resources to work on a plan that is not relevant and when there will be no decision about what the post-delisting classification of wolves will be: protected wildlife, same species or unclassified. You also don’t know what science will tell us in another 7/10 years to help formulate a plan.

I strongly recommend that any and all connected to Washington’s Department of Fish and Game be required to read wolf related books. Books provide valuable information about these magnificent animals.

As a starter, I recommend “Never Cry Wolf” by Farley Mowat. You will learn a thing or two.

And, you should also be aware of the Wolf Credo by Del Goetz 1988.

Respect the elders
Teach the young
Cooperate with the pack
Play when you can
Hunt when you must
Rest-in-between
Share your affections
Voice your feeling
Leave your mark.

Hoping and howling you do what’s right.

We did make several edits to the language in this section to clarify that wolves are being managed under the Wolf Conservation Plan, and that the strategy that identifies the development of a post delisting plan does not pre-suppose that wolves will be hunted. While we make that statement, we also provide additional information about the relative public support for hunting of wolves and the statement made on page 70 of the Wolf Plan that the Department would most likely recommend that wolves be classified as a game species. We hope that helps with the understanding of why wolves are addressed in this Game Management Plan.

Wolf management brings with it a whole different level of public interest, scrutiny of decisions, and challenges compared to other wildlife issues. It took five years to develop a Wolf Conservation and Management Plan; it will likely take at least as long to develop a plan for managing wolves after they have met delisting objectives. Resources invested now will likely pay large dividends compared to waiting until after wolves have reached or exceeded recovery objectives.

As described in both the Wolf Conservation and Management Plan and this draft Game Management Plan, delisting and future classification of wolves by the Department will go through a separate SEPA process.
For these reasons, placing wolves in the game division is premature. First, we have a very small population of wolves. Second, hunting wolves to control their population will not increase tolerance of wolves. And third, a partnership of Washington state wildlife advocates, ranchers, and government agencies working together to use proactive, nonlethal deterrents, e.g. guard dogs, can minimize livestock and wolf conflicts as demonstrated in the Idaho Wood River Wolf project. Using only nonlethal control methods, the Idaho Wood River Wolf project protected 100,000 sheep over the last 6 years losing less than 0.03% percent to wolves—less than 5 sheep a year out of thousands! And no wolves had to be killed in reaction to livestock conflicts in the 1000 square mile project area. If this can work in Idaho’s high density wolf habitat, it can certainly work in Washington. In conclusion, wolves should retain their protections in Washington State and not be subject to the game management plan for 2015-21.

There was a balance of nature before man stepped into the scene and tried to exert his wisdom! From all the weather related calamities we are experiencing how well do you think we are doing? Everything is dependent on everything else, the Indians knew that but we’re not nearly as wise as they were. We might claim to be intelligent but certainly not wise.

The killing of these amazing animals need to stop, before it is too late, like it is too late for the black rhino. Wolves are one of the most wide spread animals in the world, and are very different than the black rhino. Conservation of wolves is important to the citizens of Washington and to the Department. We plan to manage for a healthy sustainable population of wolves here in Washington.

Wolves are to be PROTECTED! They are and will be until they reach the recovery objectives identified in the Wolf Conservation and Management Plan.

I am writing to urge you to stop treating wolves like animals that are-- or will be -- a game species. These precious and beautiful animals must be protected and not hunted or slaughtered! They are not yet off the state or federal endangered species lists!

I also urge the elimination lead ammunition in all hunting activities in order to protect wildlife, the environment, and human health.

As regards the WDFW’s 2015-2021 Game Management Plan, please note that no wolf game management plan is needed during the time period of 2015-2021. However if the new plan is going to be adopted:
1) Please delete Objective 4 in the “General Game Management Issues” section, on p. 2, which seeks to develop a plan for how wolves will be managed after recovery objectives have been achieved.
2) Also delete “wolves” in Objective 26 from the “Wildlife Conflict” section, on p. 4, regarding a reporting system for complaints about hunted game species.

Thank you for considering my input. We are stewards of the earth and its creatures and must discharge our responsibilities with good sense and compassion.

I am not an untrained, uneducated citizen, jumping on the band wagon for every “animals are just furry people” cause. My education was in biological and geological sciences, furthered by coursework in a half dozen other sciences, plus the 200-300 books that I read each year on topics like evolution, vertebrate paleontology, geomorphology, physics, and astronomy. I believe that I have logical thought processes and try not to engage in political rhetoric. Therefore, I feel that I am fairly objective when contemplating the bill that affects “wolf management.”

1st, wolves are not “game” animals. They are maligned apex predators that people force out of areas where they kept the “game” animals (deer, elk, moose, even mice) in balance. Every high school biology student knows that if there are NO predators, the browsers will overpopulate, eat every grass/leaf in their environment, develop diseases, and eventually starve themselves down to a small population. Hunters don’t want that, although they typically blame their own lack of prowess on predators "taking all the trophy animals." The real truth is that hunting brings in lots of $5, so it is a politically effective lobby against all that is biologically sound. (Plenty of cases where hunters killed/trapped/moved predators out of areas, only to find that the "prey" populations did exactly what was mentioned in the 3rd sentence of this paragraph.) So, hunters are not objective enough to manage game. Plus, wolves don't need managed! They will only populate to the approximate number needed to balance with the browsers, then, as the studies of every predator/prey cycle shows, the two populations will approximately pace each other: more deer born will provide food for more wolves; reduction of the deer population resulting in starving/less pups or moving of the wolf population.

2nd, elected officials have a duty to consult "real wildlife experts," not gun lobbies, "sportsmen" who would shoot domestic pets if mounted Great Danes and Maine Coon cats became a world fad, Division of Wildlife workers who know where their bread is buttered.

3rd, my own personal reaction is a real distaste for what we call "sport hunting." Killing an unsuspecting animal from a great distance while involving yourself in no real danger and using advanced technology is hardly a “sport,” and the ever increasing number of 6 to 9 year-olds that are shooting deer and bear every year certainly calls the skill level needed into question. How about hunting with only a knife or spear? A naturally armed elk or bear would actually have fair odds to unsuspecting animal from a great distance while involving yourself in no real danger and using 3rd, my own personal reaction is a real distaste for what we call "sport hunting." Killing an unsuspecting animal from a great distance while involving yourself in no real danger and using 3rd, my own personal reaction is a real distaste for what we call "sport hunting." Killing an unsuspecting animal from a great distance while involving yourself in no real danger and using 3rd, my own personal reaction is a real distaste for what we call "sport hunting." Killing an unsuspecting animal from a great distance while involving yourself in no real danger and using 3rd, my own personal reaction is a real distaste for what we call "sport hunting." Killing an unsuspecting animal from a great distance while involving yourself in no real danger and using 3rd, my own personal reaction is a real distaste for what we call "sport hunting." Killing an unsuspecting animal from a great distance while involving yourself in no real danger and using just as they were. We might claim to be intelligent but certainly not wise.

Thank you for your comment.

Thank you for your comment, please see the previous responses regarding management of wolves.

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Thank you for your comment.

Thank you for your support.

Thank you for your support of this objective and strategy.

Thank you for your comment.

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Thank you for your support of the post-delisting plan to help ensure sustainable wolf populations while minimizing conflicts with livestock.
Follow the existing Wolf recovery and management plan. Thank you for your support of this objective.

I am a citizen of Washington State and wildlife biologist. I have conducted scientific studies on risk factors for local extinction as well as human-wildlife conflict and stress in wild animals among other subjects. I am writing to comment on Draft Supplemental EIS for the 2015-2021 Game Management Plan. In my professional, scientific opinion, wolves in Washington state should NOT be included in the 2015-2021 Game Management Plan.

Including wolves in the Plan would be contrary to current data and the best available science on the risk of extinction and the management of endangered species. Proposing their inclusion therefore appears to be based on flawed logic and faulty assumptions. In particular, it is many years too soon to be making decisions about wolves that assume they will be a game hunted species.

If wolves are de-listed at some unknown future date owing to some future recovery achievements, what would happen then? Even after evidence was gathered and evaluated and a modification to endangered status recommended and that decision made official, a species doesn’t automatically become a game hunted species. Not at all. Under such circumstances, Washington citizens would have the right to consider the evidence themselves and have a voice regarding whether and how that species might be managed under the Plan in effect at that time.

But we aren’t talking about some hypothetical outcome at some unspecified time. We are talking about wolves in Washington right now in 2014. And, we are compelled to make decisions based the best-available science and the evidence at hand.

The stated purpose of the Game Management Plan is to address management of hunted game species. Presently, wolves are a state endangered species, not a hunted game species. To include wolves in the Plan, Washington State would have to presume wolves 1) will be eligible for de-listing, and 2) will be designated as a game hunted species. However, no compelling scientific data have demonstrated that wolf status has either changed significantly in the recent past or predict that such change will in the near future during dates covered under the 2015-2021. Further, item 2 above is not an automatic outcome. In short, the inclusion wolves is not only entirely unsubstantiated, but also quite backwards.

Wolves are a state endangered species right now precisely because all of the data and all of the scientific tools in our toolkit demonstrate that wolves in our state are at risk. Many people, myself included, would like that to change. Many of people are working toward the recovery of our wolves. We can remain hopeful for the wolves and remain committed to positive change, but we cannot say we are there yet. Until that is the case, we need to be smart about our policies and practices.

We also need to be smart about our State's resources. If there are resources to invest in our wolves, invest in their protection and recovery rather than squandering what we have on unsubstantiated potentialities.

Evidence should be driving all state planning, including the process at hand. The proposed action regarding wolves and Washington's Game Management Plan is fatally flawed by its assumptions, is not evidence-based, and not supported by best available science. Adding the wolf to our 2015-2021 plan is not scientifically or otherwise environmentally justifiable. Thus, I urge WDFW to remove wolves from the 2015-2021 Game Management Plan.

This presentation is my own opinion. I have not sought or received endorsements. Environmental impact statements are CRITICAL. The Federal1973 Endangered Species Act and amendments were based on EIS that said wolves would decrease big game herds by 7% (<2%). Experience has shown biologists were significantly in error. Eighty percent of the Yellowstone herd has been lost. Experience has shown wolves do not limit themselves to the sick, lame and old. Wolves kill far more than they consume. All western states are suffering from this faulty EIS. I do not expect WA to correct Federal problems, but I do expect WA to correct WA errors. When WA appointed a “independent” 17 person committee to formulate WA's wolf management plan, misguided WDFW biologists leviad a 15 breeding pair requirement on its own, supposedly objective, committee resulting in a 6 breeding pair minority report recommendation. Experience has shown that 10 breeding pairs in Wyoming, Montana and Idaho have allowed exponential exponential exponential increases in such state. Ten breeding pairs in each of those states have resulted in approx 250 breeding pairs and countless individual wolves. All are within wolf traveling distance of Washington. This does not count BC or Oregon wolves. THERE IS NOW NO BIO DIVERSITY PROBLEM!!! Washington state needs management control of wolves as soon as possible. Alaska is the only state to effectively manage large predators because Alaska has to protect subsistence hunting of other game species to insure the survival of people. Washington needs the same type protection to insure the survival of other game species, the survival of local economies such as Colville, the survival of area ranching, the survival of the hunting tradition and, if big game herds are lost, the very survival of WDFW as we now know it. Correct your past errors and establish a more effective, updated state wolf management plan ASAP.

Thank you for your comment.

As stated in this game management plan, wolves will be managed under the state’s Wolf Conservation and Management Plan until they reach the recovery objectives identified in the Plan.

The reason that wolves have been identified by the public as important to management of game species is because of the concern of their potential impacts to game species, especially deer, elk, and moose.

We did make several edits to the language in this section to clarify that wolves are being managed under the Wolf Conservation Plan, and that the strategy that identifies the development of a post delisting plan does not pre-suppose that wolves will be hunted. While we make that statement, we also provide additional information about the relative public support for hunting of wolves and the statement made on page 70 of the Wolf Plan that the Department would most likely recommend that wolves be classified as a game species. We hope that with the understanding of why wolves are addressed in this Game Management Plan.

Wolf management brings with it a whole different level of public interest, scrutiny of decisions, and challenges compared to other wildlife issues. It took five years to develop a Wolf Conservation and Management Plan; it will likely take at least as long to develop a plan for managing wolves after they have met delisting objectives. Resources invested now will likely pay large dividends compared to waiting until after wolves have reached or exceeded recovery objectives.

As described in both the Wolf Conservation and Management Plan and this draft Game Management Plan, de-listing and future classification of wolves by the Department will go through a separate SEPA process.

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This is a good question. I'd like to be able to shoot them on sight if they are near my family or livestock. Yes, they are alpha predators, something scientists who live in cities conveniently ignore.

This plan should include a public debate and comment period before implementation. Please withdraw this objective from the Plan.

This seems premature. This population has hardly recovered. The SEPA and Commission rule making processes will encourage public participation and comment prior to adopting a wolf management plan after wolves are delisted.

I STRONGLY support the decision NOT TO INCLUDE WOLVES in the game management plan, and this is not that far away especially when you consider how long it took to complete the first wolf plan. The initial Wolf Conservation and Management Plan was started in 2007, before we had a confirmed pack of wolves. It was adopted by the Fish and Wildlife Commission in December 2011, when we had nine packs. It does not seem premature to start a post delisting plan.

I support WDFW’s current decision not to include wolves in the 2015-2021 Game Management Plan. The SEPA and Commission rule making processes will encourage public participation and comment prior to adopting a wolf management plan after wolves are delisted.

I STRONGLY support the decision NOT TO INCLUDE WOLVES in the game management plan after wolves have met recovery objectives.

A plan to manage wolves after they meet the current goals should have been a part of the original wolf management plan, not an add-on that will take several more years to get any type of approval and will then be challenged by renewed lawsuits anyway.

Addressing this is premature. Wolves are far from endangered status recovery. No, we are continuing to utilize the Wolf Conservation and Management Plan until wolves reach recovery objectives. Thank you for your support of this objective and strategies.

This seems premature. This population has hardly recovered. However, the current and proposed management strategies are expected to meet recovery objectives by 2021.

This plan should include a public debate and comment period before implementation. The development of a wolf management after wolves have reached recovery objectives, will address the potential for wolves to impact prey species.

I support WDFW’s current decision not to include wolves in the 2015-2021 Game Management Plan. As stated in this game management plan, wolves will be managed under the state’s Wolf Conservation and Management Plan (Plan) until they reach the recovery objectives identified in the Plan.

We appreciate that you agree with the importance of a post de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan.

We agree that the issue of hunting wolves, regardless of recovery objectives should be considered. We are not proposing any changes to the Wolf Conservation and Management Plan.

We appreciate that you agree with the importance of a post de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan.

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Please prohibit any hunting or killing of wolves, even after recovery objectives are achieved. The SEPA and Commission rule making processes will encourage public participation and comment prior to adopting a wolf management plan after wolves are delisted.

Simple. A year round, unlimited harvest season just like coyotes. It's so easy, why not just let them be?

The plan should be to allow hunters to manage the wolf population, this should be done sooner rather than later. We have a sound Wolf Management Plan that has already been created by a large cross-section of interested stakeholders, not just hunters. Please withdraw this objective from your proposal and focus on increasing our wolf population, not eliminating it.

This is a good question. I’d like to be able to shoot them on sight if they are near my family or livestock. Yes, they are alpha predators, something scientists who live in cities conveniently ignore.

This is highly intelligent and social, and are not game animals. Don’t allow lethal management or hunting of wolves, regardless of recovery objectives. Wolves are highly intelligent and social, and are not game animals.

This seems premature. This population has hardly recovered. Wolf management after wolves have met recovery objectives.

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I STRONGLY support the decision NOT TO INCLUDE WOLVES in the game management plan. We are not proposing any changes to the Wolf Conservation and Management Plan.

Given the passes wolves before they ever meet population objectives on the west side of the state. Either way, planning should be started well before recovery objectives have been achieved.

As experienced with the initial Wolf Plan, it will take a lot of work and public involvement to draft a Plan for after wolves have met recovery objectives. The only management strategy identified in the Game Management Plan is to develop a plan for after wolves have met their recovery objectives. We are not proposing any changes to the Wolf Conservation and Management Plan.

We appreciate that you agree with the importance of a post de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan.

The SEPA and Commission rule making processes will encourage public participation and comment prior to adopting a wolf management plan after wolves are delisted.

We appreciate that you agree with the importance of a post de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan.
I think WDFW would be better positioned to develop a plan for how they will be managed prior to recovery objectives being met. We all know this day will come so why not be proactive so when the time comes a plan will already be developed and only need to be refined. Once delisted it would take a while to develop a plan all the while limiting hunters from pursuing them until known harvest limits and overall management are established. Lawsuits will likely be filed to tie up the litigation in the courts and WDFW would be criticized for not having a management plan post-delisting to back them up. Write the plan before delisting.

It is premature to include this objective in current plan as wolves will not reach recovery quota within this period.

Our assessment is that wolves will meet recovery objectives by 2021, so is not that far away especially when you consider how long it took to complete the first wolf plan.

It is important that we continue to keep wolves protected in Washington state. The losses of the Lookout Pack and the Wedge Pack (in the Methow Valley) make clear that as a state we do not have the maturity to manage wolves as a game animal. They have nowhere near achieved recovery "in a significant portion of their range" across the state, and we must learn better skills for coexistence (guard dogs, fladry, range riders, etc.). I look forward to being part of this movement with you.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

It is about time! We were first told that if there were five documented breeding packs in Washington State, then the Department would permit a regulated wolf hunting season. Never happened!

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Just like our other big game predators. Limited hunting where populations allow

That will be addressed by objective 4 and the development of a post delisting plan for wolves.

Legalized hunting seasons

That will be addressed by objective 4 and the development of a post delisting plan for wolves.

Letting more people know what the objectives are and how they are going to be achieved

That will be addressed by objective 4 and the development of a post delisting plan for wolves.

Make very certain the numbers of wolves never reach a point that damages gains in deer and elk numbers. Never allow wolves into Olympic National Park, or the Olympic Peninsula. Let's save this area for a real scientific study area. Plus I do not think the guides and hunters in this area would ever accept the wolf.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Need to allow wolves to be hunted

That will be addressed by objective 4 and the development of a post delisting plan for wolves.

No killing -- does anyone think lack of a plan is smart? However, you also need an intern plan beforehand and then including what happens when numerical objectives are met but the species remains federally and State listed as endangered and you are unable to avail yourselves of all the needed management tools.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

No, decrease wolf populations from what they are now before they severely impact our elk and deer populations

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

No. It is too early to develop a post-delisting management plan. There are currently only 5 successful breeding pairs in Washington. Before delisting, there has to be at least 12 breeding pairs, distributed throughout all 3 management zones for at least 3 consecutive years. In order to be considered a successful breeding pair, two wolves have to raise two pups for one year. So even if seven new breeding pairs happen to pop up next year, it wouldn't be until 2019 that gray wolves could meet delisting criteria. Since it's virtually impossible that 7 new breeding pairs will pop up next year, the probability of the delisting criteria being met during this Game Management Regulation period is next to nothing. Wolves are still an Endangered Species and will remain so for many years. Please follow the state gray wolf Conservation and Management Plan while wolves are endangered. When wolves are delisted, which could be a decade or more down the road, hold many, many public meetings and hearings. Do not jump to hunting wolves. Wolves are self-regulatory and hunting would be a political move for recreation. Delisting does not mean open hunting seasons on wolves. I would also ask that the department hold more educational meetings to inform folks about wolves, especially in hunting and ranching communities. Attempt to increase tolerance toward wolves among these groups; it may increase support for the department.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Open them to hunting like Montana and Idaho. Allow use of leg hold traps for those who have passed trappers ed

Thank you for your support for this objective and strategies.

Pay more attention to areas of conflict in regards to needing the plan developed now. We manage all animals by hunting. My first choice would be to take predators out of big game classification and return them where they rightfully belong..._PREDATOR CLASSIFICATION. That will be addressed by objective 4. However, Washington does not have a predator classification.

We agree and are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Perhaps wolves could be introduced where elk are a problem!

That will be addressed by objective 4 and the development of a post delisting plan for wolves.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Plan is good. But let's not plan forever. Once established which seems they are now we need to allow people to hunt them.

That will be addressed by objective 4 and the development of a post delisting plan for wolves.

Please stay the course and do not include wolves in the 2015-2021 Game Management Plan. While the lethal management of wolves as game animals, as dictated by the best available pack and social science, may be a reasonable course of action down the line, wolves are still recovering in our state, still unstable, and still facing a wide range of threats. Until such recovery goals have been full met, Washington's wolves should not be included in the game management plan.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Population numbers need to be per wolf not just counting the Alpha.

We do conduct a ‘minimum’ count of wolves each winter and include it in our annual report.

Quit putting wolves into places without knowledge of neighboring landowners and the public in general.

We have not put wolves anywhere; they re-colonized the state on their own.

Raise the level of recovery to more packs. Reduce cattle grazing on public land and require ranchers to use every available option to protect their cattle, sheep and other farm animals from depredation.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Recovery objectives should always take into consideration the needs of private property owners before the needs of public if damage is or may affect private individuals life or property values.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Recovery objectives have not been met in any sustainable way. The best wolf management would be cattle management. There is no shortage of beef or dairy cattle within the United States of America.

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

Recovery objectives will not be achieved for many years. Please, think of wolves for the benefits to ecosystems they provide and manage them for pack quality, not target practice. Breaking up wolf

We are not proposing any changes to the WolfConservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.
Wolves need to be maximizing the number killed unless special circumstances are involved. An emphasis towards not targeting the minimum number needed to be in the population (i.e., not the post-de-listing plan). This is another example of WDFW being reactive, not proactive. This plan should be about how to teach ranchers and farmers to co-exist with wolves. We are not proposing any changes to the Wolf Conservation and Management Plan. It will continue to direct wolf management until they reach recovery objectives.

Shooting a wolf is not lawful unless it is caught in the act of attacking humans or domestic animals where not federally listed.

We appreciate that you agree with the importance of a post-de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan. This is premature and clearly indicative of wolves being managed under the game side as opposed to the recovery of wolves is a federal thing now. We appreciate that you agree with the importance of a post-de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan.

Stop the recovery process. We are not proposing any changes to the Wolf Conservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

The landscape in Washington has changed dramatically in the last 150 years. Humans are the main influence of that change and are a dominant factor in the ecosystem. Wildlife management by humans is necessary in this age to maintain support for healthy populations.

There are several representatives of landowner and agricultural interests on the Wolf Advisory Group which will play a significant role in helping the Department develop a post-de-listing plan for wolf management. We recognize the issues for wolf management and that is why we have proposed that a post-de-listing plan for managing wolves be developed over the next few years.

This is another example of WDFW being reactive-not proactive. This “plan” should have been in place years ago. We have a wolf conservation and management plan in place until wolves reach recovery objectives. Our proposal is to develop a plan for after wolves reach recovery objectives which we estimate to be in the year 2021.

The situation is one that is heated. I want wolves to be honest with how many breeding pairs there are. I also think if we look at other states and the decline of the recovery of wolves is a sad thing now. This is premature and clearly indicative of wolves being managed under the game side as opposed to endangered species. It is “not” even close to beginning this process but including it does seem to indicate that the game division is looking to very severely decrease the wolf population.

We are not proposing any changes to the Wolf Conservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.

There is a reason wolves were hunted and killed the way they were. Only tree hugging city dwellers who do not have to deal with dangerous predators want to bring these things back. If these people want them so bad, release them in their back yards so they can deal with them. Shooting a wolf is not lawful unless it is caught in the act of attacking humans or domestic animals where not federally listed.

We appreciate that you agree with the importance of a post-de-listing plan. I think some of the concern about including it as part of the original Plan was that it would take even longer than the five years it did take to complete a plan. This department should listen more to the other states like Idaho or Montana on the can of worms that do not need to happen in the first place.
<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wolves were not part of Washington habitat 40 years ago and should not be introduced to this state ever.</td>
<td>objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.</td>
</tr>
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</tr>
<tr>
<td>Wolves will and many cases are decimating the harvestable animals such as deer and elk. Reduce the packs to extremely low numbers. Hunting &amp; fishing license monies should be completely removed from supporting wolf management.</td>
<td>At this point there is not any indication that wolves are causing declines in deer and elk in Washington. If they do, there is a provision in the Wolf Conservation and Management Plan that addresses the problem. Wolf recovery is being funded with personalized license plate funds and federal funds.</td>
</tr>
<tr>
<td>Wolves will recover for perhaps decades. Their relationships with their prey species will also develop over time. The time to worry about achieved recovery objectives will be some time after the last healthy wolf packs in the Olympics, and several in the South Cascades, and the elk are no longer trashing the riparian corridors of West WA river because they have returned to a semblance of their appropriate numbers again.</td>
<td>We are not proposing any changes to the Wolf Conservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.</td>
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<tr>
<td>Objective 5: Increase the number of hunters who purchase a license annually rather than every couple of years and create incentives for those who have stopped hunting to participate once again. Increase the number of hunters purchasing a license for the first time in Washington.</td>
<td>In order to increase hunter #s you need a product to sell. To many hunters are disappointed with seeing very little game. The cost to hunt has become cost prohibitive for a lot of people. Just applying for special hunts has gotten to expensive. Many hunters have quit applying because cost, and not drawing tags for 15+ years. You want to increase hunter #s come up with family lic-tags at a reduced rate, and or free first time hunt licenses. Change the multi-season to. Add a single user group tag/sup, med/arch/muzz for a $50.00 fee. The so called reduced price of $139 to $182 is still too high.</td>
</tr>
<tr>
<td>Yes but they should also add wolf populations should be kept in check by allowing hunting season to keep the numbers under control.</td>
<td>Decrease the number of hunters. Increasing costs for licensing would encourage more annual license purchases. Perhaps costs are important; however the reasons why people don't hunt will be addressed by the stakeholders group.</td>
</tr>
<tr>
<td>Yes, and involve all stakeholders, ranching, sportsmen, and others in the process. Give all stakeholders decision making votes or some control over the final product.</td>
<td>Yes, my guess is objectives have been met, do not get behind the 8 ball like Montana and Idaho did.</td>
</tr>
<tr>
<td>Wolf Recovery - Wolf recovery is being managed under Washington's Wolf Conservation and Management Plan (Wolf Plan) that was adopted by the Fish and Wildlife Commission in December of 2013. The Wolf Plan lays out the recovery objectives of at least fifteen breeding packs of wolves for three years distributed across the state in three recovery zones. Key issues such as wolf-livestock conflict and wolf impacts on ungulate populations are addressed in the Wolf Plan and will continue to be implemented consistent with that plan. The 2009-15 Game Management Plan identified wolf recovery as an important issue for management of game species with strategies associated with completion and implementation of the Wolf Plan and monitoring impacts to ungulate species. We agree.</td>
<td>The public comment process is identified in the proposed strategies.</td>
</tr>
<tr>
<td>Wolves are not promoting any changes to the Wolf Conservation and Management Plan. We are not proposing any changes to the Wolf Conservation and Management Plan. It will continue to direct wolf management until they meet recovery objectives. The only objective identified in the draft Game Management Plan is to develop a plan for after wolves have met their recovery objectives.</td>
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**PUBLIC COMMENT**

**WDFW RESPONSE**

- **Objective 5:** Increase the number of hunters who purchase a license annually rather than every couple of years and create incentives for those who have stopped hunting to participate once again. Increase the number of hunters purchasing a license for the first time in Washington.

- In order to increase hunter #s you need a product to sell. To many hunters are disappointed with seeing very little game. The cost to hunt has become cost prohibitive for a lot of people. Just applying for special hunts has gotten to expensive. Many hunters have quit applying because cost, and not drawing tags for 15+ years. You want to increase hunter #s come up with family lic-tags at a reduced rate, and or free first time hunt licenses. Change the multi-season to. Add a single user group tag/sup, med/arch/muzz for a $50.00 fee. The so called reduced price of $139 to $182 is still too high.

- Decrease the number of hunters. Increasing costs for licensing would encourage more annual license purchases. Perhaps costs are important; however the reasons why people don't hunt will be addressed by the stakeholders group.

- **Disagree**

- Give them a reason to buy a license, too many regulations that most people don’t understand. Do away with multi-season permits, sell a license and tag for whatever species and allow the hunter to hunt with the method for the season that’s open without paying an extra fee. Example: a hunter buys a deer tag, that hunter would be able to hunt any archery, muzzleloader or modern firearm season that is open for general deer without any additional fees. The only exception would be if a hunter is going to apply for a special permit for deer or elk they would have to declare a method of hunting before purchasing an application for the special hunt. Example: a hunter wants to apply for an archery special permit for elk; they must declare archery and would not be able to apply for a special elk permit for muzzleloader or modern firearms.

- **Agree**

- Hunters should have to pass classes/tests before they are given a hunting license. Hunters born after 1972 do need to pass a course of hunter safety/education.

- I am opposed to incentives to increase the numbers of hunters in our state. Killing contests for coyotes or any other animal are offensive and barbaric. Killing for sport is not as popular as it used to be. The makeup of Washington population is changing; people’s ideas of recreational fun are changing. I don’t believe that hunters represent the majority of residents in our state. If it is about revenue for the state, let us develop ways to make money from people viewing wildlife, photographing, hiking, buying license plates for the benefit of wildlife.

- Generally, Washington residents support hunting (over 80%). However the majority do not support hunting contests for predators. Your suggestion that the funding mechanism for wildlife conservation should change has been supported by many in the environmental community. Yet only a little over $5M out of WDFW’s biennial budget of over $300M is provided by funding from non-hunting or fishing interests. And most of the $5M is from the sale of personalized license plates. Surveys of these plate holders indicate that very few purchase the plate for the reason that it supports funding for the conservation of non-hunted species.

- A concerted attempt by the environmental community to provide a conservation funding mechanism would likely be supported by WDFW. However that strategy is outside the scope of this game management planning effort.

- I am totally for this. The WDFW needs to take a very hard look at what they are charging in fees as compared to all other states. You have some of the highest in the nation bordering. I am out there a lot and your fees are the most complained about part of the program and the #1 reason I hear people say they can't afford it or simply won't pay the robbery. Seriously ... put yourself together an eye chart of where this state stands against other states. It's terrible.

- License fees are only one aspect of why citizens decide whether to hunt or not. The strategies identified under this objective will help determine how much of a role fees play into the decision of whether to hunt or not. Thank you for your support of this objective.

- I find objective 5 questionable. Why limit this to hunters? Why not include hikers and other recreational user groups? You may be right, but hikers and other wildlife recreational users do not contribute directly to wildlife conservation funding.

- Increase the number of nature watchers who utilize public lands and create incentives for those who have stopped visiting to participate once again. This might help, but WDFW only owns or manages about one million acres out of 44M acres of uplands in our state.

- More killing, what a good idea. Idiots

- My understanding is that hunting is a sport and a measure of skill. Do we need more hunters? Thank you for your comments.

- Need more access to hunt, in eastern Washington if you don't know someone with property then good luck.

- This issue is addressed in subsequent parts of this plan.
The horse is on the ground, and no matter how hard WDFW kicks, it isn't getting up. WDFW needs to get management to face the new reality and work to create a business model that embraces non-consumptive users and brings them into the funding picture. With ten times as many wildlife watchers as hunters, WDFW apparently lacks any vision of where the potential growth market lies. Also, a 5% drop in paid license holders in the past decade does not bode well, especially while the population of Washington is increasing by more than 11% in that same period.

The number of people purchasing a license won't increase when the opportunity for harvesting an animal drops like a stone due to unchecked predator population explosion. Thank you for your comment. Your concern is the reason for the objective related to predator/prey management. However, you should be aware that the number of times that control of predators intended to increase prey numbers has been successful in modern times is limited.

There is a loss of interest in hunting because management of predator species is politically rather than scientifically based and because hunting is irrelevant in the 21st century. No question, so help develop the funding mechanisms. Is this the role of WDFW or conservation minded interests? I can guarantee you that if a mechanism is developed with broad support, the Department will support it.

This can be easily done by increasing bag limits in the general season for specific GMUs. If there is more reward for hunting, then people will naturally gravitate toward more participation, but if the seasons remain short and the reward remains small, there is far less incentive to participate, no matter how many people purchase license. Case in point: I am not purchasing a hunting license this year because of cost, short season, and diminished opportunities for success. I am choosing to spend my money on other activities. Also, the opportunity for success on a managed game reserve is higher than general hunting, so hunting there with no need to waste money on a license, having a higher opportunity for success, and a longer season makes more financial sense than hunting in the WDFW way.

This means manage for more huntable game and access, not cheaper licenses or advertising campaigns. The lack of opportunity and number of animals is a major cause of declining numbers of hunters. Harvest success is no doubt an important consideration for hunter motivation to purchase a license. However, there are many more factors that come into play. This objective and strategies are designed to determine the most important factors.

This objective needs to be deleted. WDFW, like all fish and game commissions, needs to find new sources of funding besides hunting tags. The non-consumptive users of wildlife/wildlands e.g. campers, bikers, photographers, tree-suckers, etc. produce 9 times the money of the consumptive users. As the number of hunters decreases, 4% of the Washington population, new sources of funding need to be found. Non-consumptive users need seats on the commission, which would help fund hunting and be more representative of the state's use of wildlife/wildlands. 80% of the state's population are non-consumptive users. There are other state wildlife commissions who are branching out and tapping into the non-consumptive users, e.g. Florida and several other states. It would be well worth investigating some of these approaches.

Washington State could benefit economically from less hunting and more ecotourism. The revenue for our state is much higher for ecotourism and should be given high priority to further increase this revenue stream. This easy answer is put up or shut up. Washington citizens have tried in the past to develop initiatives to fund wildlife conservation and management and those initiatives have been strongly supported by WDFW. The public has not supported those mechanisms.

This recommendation will be addressed by the stakeholder's group when they develop the plan. This decision needs to be deleted. WDFW, like all fish and game commissions, needs to find new sources of funding besides hunting tags. The non-consumptive users of wildlife/wildlands e.g. campers, bikers, photographers, tree-suckers, etc. produce 9 times the money of the consumptive users. As the number of hunters decreases, 4% of the Washington population, new sources of funding need to be found. Non-consumptive users need seats on the commission, which would help fund hunting and be more representative of the state's use of wildlife/wildlands. 80% of the state's population are non-consumptive users. There are other state wildlife commissions who are branching out and tapping into the non-consumptive users, e.g. Florida and several other states. It would be well worth investigating some of these approaches.

The regulations for purchase of multi-season tags have been reduced for deer. The number of people purchasing a license annually now. That will be a balance that the stakeholder's group must weigh in developing a plan. This decision needs to be deleted. WDFW, like all fish and game commissions, needs to find new sources of funding besides hunting tags. The non-consumptive users of wildlife/wildlands e.g. campers, bikers, photographers, tree-suckers, etc. produce 9 times the money of the consumptive users. As the number of hunters decreases, 4% of the Washington population, new sources of funding need to be found. Non-consumptive users need seats on the commission, which would help fund hunting and be more representative of the state's use of wildlife/wildlands. 80% of the state's population are non-consumptive users. There are other state wildlife commissions who are branching out and tapping into the non-consumptive users, e.g. Florida and several other states. It would be well worth investigating some of these approaches.

We have modified the language used in Objective 5 to address your comments about license sales, but the bottom line for funding conservation is that we need to maintain a revenue stream. Actually the on-line courses have helped us serve more students.

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This recommendation will be addressed by the stakeholder's group when the develop the plan. Based on the failure in recent history in most states to develop funding mechanisms from the general public, there will also be fewer funds to pay for conservation programs that benefit all wildlife including predators.

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Enjoyable! A lot of hunters are crowded into small areas.

Give incentives for hunters to drop for a season so the prey populations may increase.

Population objectives for most prey species are set to address many issues. Where populations are below objectives for polygamous species, the harvest of females is restricted to allow growth.

No. Do not increase the hunters. Stop allowing humans to hunt these populations which need to rebound.

In many cases, wildlife population levels are as robust as they have ever been since human settlement. Modern management of hunting has not resulted in the decline of wildlife species; rather habitat loss as a result of the human population expansion is the most serious long term cause of decline.

First time hunters are clearly a good thing. Others I'd have to hear the plan.

Thank you for your tentative support; the stakeholder group knows that they will need to develop well supported ideas in their plan.

I agree with this objective.

Thank you for your support of this objective and strategies.

NEVER! If people do not hunt, then encouraging them to do so is without merit.

In many cases, wildlife population levels are as robust as they have ever been since human settlement. Modern management of hunting has not resulted in the decline of wildlife species; rather habitat loss as a result of the human population expansion is the most serious long term cause of decline.

What about providing a lifetime hunting license for those who leave the state after residency will have an incentive to return, since Washington is hard to compete for big game tags such as Idaho/Montana/Wyoming.

This is an issue for the Legislature to decide rather than the Department. However, we are considering this proposal in our request to the Legislature.

The department is losing hunters because they are not working with hunters and land owners like other States do.

We are working with hunters and landowners and it continues to be an important part of managing hunted species.

The false sell more tags when the animals aren't there to be harvested unless you just are worried about your job? If there is an abundance of deer and elk it didn't take an average of 1 elk every 30 years then you would have more people hunt. My whole family is about to give up hunting here.

We are not talking about “forcing people to hunt”. We don’t think people have chosen not to hunt, we think that the changing demographics to a more urban society have resulted in fewer people being exposed to the tradition.

Washington is not a resident-friendly state to apply to and hunt. You're missing a lot of possible hunters, with the purchase license prior to special hunting application.

Because Washington has the smallest land base in the west and the second highest human population (and we are either second or third in hunter numbers), there are many challenges to managing hunting. However hunter success rates are respectable with one in four harvesting a deer each year and one in ten harvesting an elk. This success rate comes without substantially limiting hunter participation which is a high value to Washington hunters.

Make rules & regulations easily read &understood & out to public sooner

This is explained in the issue statement, but the greatest reason is to maintain funding for conservation programs into the future.

No this is a dumb rule! You shouldn't have to force people to hunt. Hunting is a personal choice and a privilege that should not be forced on people to participate. This wastes the taxpayer money on time spent on advertising or solutions to promote more hunting for people who have clearly chosen not to participate.

Why are we encouraging people to start hunting again?

This is explained in the issue statement, but the greatest reason is to maintain funding for conservation programs into the future.

Lower the prices of licenses

This will be one of the strategies explored by the advisory group to encourage participation.

The changes you have made to the hunting rules over the last 20 to 25 years is why you are losing hunters.

Because Washington has the smallest land base in the west and the second highest human population (and we are either second or third in hunter numbers), there are many challenges to managing hunting. However hunter success rates are respectable with one in four harvesting a deer each year and one in ten harvesting an elk. This success rate comes without substantially limiting hunter participation which is a high value to Washington hunters. Managing the game species to sustain them over time is our greatest responsibility. Balancing that with maximizing hunter opportunity is the challenge and the reason for the regulations you are describing.

No, hunter success rates are respectable with one in four harvesting a deer each year and one in ten harvesting an elk. This success rate comes without substantially limiting hunter participation which is a high value to Washington hunters.

We are not talking about “forcing people to hunt”. We don’t think people have chosen not to hunt, we think that the changing demographics to a more urban society have resulted in fewer people being exposed to the tradition.

No more incentives for predators to do a season so the prey populations may increase.

We agree that this is an area that we need to address and will be part of the plan developed by the advisory group.

What is the reason for incentivising hunting?

This is explained in the issue statement, but the greatest reason is to maintain funding for conservation programs into the future.

No. Do not increase the hunters. Stop allowing humans to hunt these populations which need to rebound.

We are not talking about “forcing people to hunt”. We don’t think people have chosen not to hunt, we think that the changing demographics to a more urban society have resulted in fewer people being exposed to the tradition.

Lower the prices of licenses

This will be one of the strategies explored by the advisory group to encourage participation.

The objectives and strategies identified in the plan described in this objective will likely include hunter success rates.

Rather than increase the number of participants, provide greater opportunity for success of those who hunt (i.e. longer season)

This is explained in the issue statement, but the greatest reason is to maintain funding for conservation programs into the future.

Tin not a hunter but past generations of my family were; mostly for the table. I know that our state's reliance upon license fees is sort of a Catch-22 matter. Raise high enough but not too high, to retain and gain license purchases.

Thank you for your understanding of the rationale and challenges associated with this issue.

This is explained in the issue statement, but the greatest reason is to maintain funding for conservation programs into the future.

Is this for increasing revenue, or for managing predator and prey populations?

These will be some of the strategies explored by the advisory group to encourage participation.

we did go more youth involved with the outdoors hunting, fishing and many other use by teaching more than hunter ed and pairing with old hunters to teach the outdoors to them. gave the youth reduce license for that year and maybe better time.

These will be some of the strategies explored by the advisory group to encourage participation.

Better public hunting access; better public info. to these areas; realistic opportunity seasons to areas with a high number of public lands.

These will be some of the strategies explored by the advisory group to encourage participation.

when the license sales were changed to the current set up, we were told it would bring costs down overall, and as we can all attest to, it just keeps getting more costly, now if we want to apply for a special permit, we have to choose only one type of hunting method per application, which makes a pretty chunk of change for the wildlife. I have threatened for years not to buy another license, and alot of family and friends have given up and claim they won't buy this year. too costly, and too few possibilities for the simple man to keep up with the permit only lands, and fewer opportunities to find an animal. this will most likely be my last year as a licensed washington hunter. also, not all of those who've stopped buying license, have given up hunting. just saying.

These will be some of the strategies explored by the advisory group to encourage participation.

(If comments) YES

Thank you for your support.

Generally like objective. Would go for a simplified system and multi-year licenses.

This will be one of the strategies explored by the advisory group to encourage participation.

Getting younger people to participate in hunting is vital to the future of our lifestyle. Incentives should be provided to motivate the younger generations to get involved.

This will be one of the strategies explored by the advisory group to encourage participation.

You'll need to increase the public's knowledge with regards to the importance of hunting as a wildlife management tool so that hunting is more acceptable to the general public. Do that through commercial advertising. Also, increase the Master Hunter program so we have more knowledgeable hunters interacting in a positive way with those of the non-hunting but possibly sympathetic-to-hunting public.

Thank you for your support.

Currently, over 85% of Washington residents support legalized hunting. The Master Hunter Program is important to the Department, but is still challenged by some members who have tarnished its reputation.

The Hunter Education Program is critical to bringing new hunters into the tradition. The Hunter program is important to the Department, but is still challenged by some members who have tarnished its reputation.
include inert gun sets, videos, and all of the necessary paperwork with step-by-step instructions on getting it started. Make sure that logistical support is ALWAYS available for new lead instructors to overcome misunderstandings, answer questions, and assist in implementing new classes and schedules. These new lead instructors should also be supplied with a list of all certified instructors within a 20-mile radius.

The reason hunters, including myself, have stopped purchasing a license in Wa. State is too restrictive. We should be using the type of game management that Mont, Idaho, And Colorado have. Hunters are tired of how restrictive Wa. is with tags, seasons, and branch antler restrictions. If you want more hunters, copy these other states.

We are looking at raffle hunts to other states because WA does not offer any good seasons to hunt. Early archery season should be set back to open and close on the same dates every year. Open on the 8th and close the 21st. This allows archery hunters to have a better chance at some success due to having a couple of days when the rut begins and elk are more responsive to calling. This also leaves the most critical rutting time free for the elk to do their thing. By the way, the only hunting group that gets to hunt in the prime rutting period is MF hunters with special permits. The way the early season is now, archery hunters have it no easier than MF hunters because the elk are still not vocal and are difficult to find. This does not help the archery hunters who only shoot our 40 or so yards. We need to be more realistic on how archers hunt and how they can be more successful.

We might wish to emphasize youth and women. The current cost of licenses and tags is prohibitive. Many cannot afford to hunt and/or fish. I purchased a hunting and fishing license and some tags and it was $200. If I was buying the same licenses for several members of my family, it would be the most unaffordable thing ever for me and most people.

It seems to me that it would be better to give more incentives to those that do buy there license instead of letting them lose as many loyal hunters.

Your prices are high. Lower them for seniors or over 60 years age should be half price or less. Also make kids 33% if the price or lower till age 18. This will attract and retain new hunters. Also make getting your hunters ed easier it is very very hard to get into a class let alone pass it.

What about the hunters that have legally purchased a license every year? Where is our incentive or gratitude?

This will surely cause an uproar for those that actively hunt. Although we hunters get incentives like the "incentive tags" for submitting hunter reports on time, what kind of incentive would reach a larger crowd of those that stopped hunting? If hunter license and tag costs are an option as an incentive which is one of the logical ones WDFW would suggest, this will not hold well for others that actively hunt given our high tag and license costs in the state already.

yes, but first the deer and elk populations have to come back, which might just mean a reductions in the predators.

I agree with trying to get more people to purchase licenses, but don't annoy those who regularly purchase licenses by giving discounts to others. Though a financial hit, I would guess the best way to increase sales would be to reduce prices

I know this is a great idea because it builds revenue but it also makes the land which is already getting restricted more crowded with un educated hunters in the woods. How about we want to raise more revenue for the legal system, county government etc. The agency should be leading everything associated with wildlife management. They have plenty to consider including the costs of funding the legal system, county government etc.

STOP MAKING US BUY PERMIT APPLICATIONS UNLESS DRAWN.

Give the incentives to who is supporting every year.

This is a worthy objective, but somewhat self-defeating. Hunters are not going to repeatedly buy licenses if the hunting isn't worth the cost, as it has increasingly become in private timber land gets locked up and increased numbers of hunters compete for decreased animals on open lands.

work with the timber companies on allowing better access for all hunting activities. Reason for some people stop hunting is due to all the gates and high priced permits to gain access to properties where we used to hunt and enjoy observing animals freely.

No. We do not need more hunters.

A lifetime basic hunting license for a state resident should be considered such as available in Idaho. As a side line there should be some consideration for "life long" residence in WA as related to senior citizens. This consideration is presently lacking in WA.

Emphasize & Target Female Participation in Hunting Sports

I really liked the increases in elk hunt running from one to three permits in serval units this year. Believe it should be expanded to five in each unit and just drop number openly bull tags accordingly to compensate. This will give more incentive to buy license and tag an a quality elk application. Also on raffle hunts consider following Idaho super hunts and give out eight deer and elk gov tags a year. I believe this would substantially increase raffleing for these animals.

This will only happen when hunters feel that Washington State is worth hunting in.

Thank you for your comment.
Do what other western states do. Allow someone to buy a deer or elk tag, which by default, is for modern rifle only. Then, if someone wants to hunt during the archery or muzzleloader season, they can purchase an additional tag option to do so. The issue shouldn't be about how many tags you sell, but that when people purchase tags they have a quality experience. Allowing multiple season options would do just that.

Game species are poorly managed and it appears the agency is more interested in maximizing revenue prior to providing a reasonable expectation of hunting experience. Thank you for your comment.

Good ol' not certain how you will do that considering shift in peoples' attitudes toward firearms and lack of hunting history in many/most families. Thank you for your support, we agree there will be many challenges.

This objective will never be met if the Department continues to increase the price of licenses, tags, and permits. It's far more fun to save one's money and travel to Idaho or Montana every other year for a quality hunt than to slug it out with Washington State hunters in tracks of land that require access fees and very little healthy game. Continued limited access to game and increasing fees from the Department will thwart this objective from ever being realistic.

Lower basic hunting license & tag fees will increase sales and hunter participation. These will be some of the strategies explored by the advisory group to encourage participation.

Move the elk season into the first week of November. Since the season ends now before it used to start, there is no back into the areas to hunt. You could give out 10,000 cow tags for area 342 and there would only be maybe 25 taken from the local herd and none left until the migration of elk came down from the high mountains. Please move the season ahead to start in the first week in November so that the hunters may have something to shoot at.

Agree, yet us hunters whom have not stopped and have hunted for years should also have incentives. This will be something explored by the advisory group to encourage participation.

Funny how you talk about incentives to get hunters to buy licenses. The commission just screwed the Master Hunters in Washington State by taking incentives away. In order to be a Master Hunter you have to do volunteer time to get in. Than we have to do volunteer time to stay in. We help teach hunters ethics, values and sportsmanship. You are always asking for us to sign up to help clean up the woods and it is all fix fences and we are always there. Now you take away our incentive by telling us we can't use our unused deer or elk tags from the 2014 regular season and forcing us to by a second tag (being a reduced price means nothing) in order to hunt in the Master hunt special permit hunts. If a non-master hunter is drawn for a special permit, they can use their unused regular season tag. We are told it is to better track the master hunters and their success in certain areas. That is a very poor answer. When we fill out our hunter reports, you know where, when, how many days, were unsuccessful. How much more do you need to know and why don't you need to track the non-master hunter? I am not opposed to buying a second tag if I am successful during the regular season, but to have to throw away an unused tag and pay $22.50 for a huge slap in the face to those who are both hunting, sportsmanship and wildlife. There are a lot of hunters bought our licenses before knowing of this rule change. I promise this will be my last in Washington state if this rules disagree.
This issue(s) can be addressed as part of this objective and strategy.

This is an issue for the Legislature because it is state law. The Commission is not authorized to change this law.

We have a watch on this. We are working on that!

These will be some of the strategies explored by the advisory group to encourage participation.

We have a watchable wildlife license that does not generate much revenue. In addition, attempts at the national and state level to develop other sources of funding have not been successful to date even with support from interested members of the general public.

Agree, but not sure how to achieve this. Access is becoming a big issue. I have to tell people interested in hunting local that they will need a pass to access timber land or drive an hour, this is a big turn off to many new hunters.

These will be some of the strategies explored by the advisory group to encourage participation.

We appreciate your support.

Thank you for your comment.

We are working on that!

Youth tag concept is great, as well as the reduced youth fees! Personally, I would like to see it expanded to age 18 instead of age 16.

These will be some of the strategies explored by the advisory group to encourage participation.

Youth hunting package, facilitate public debate of regulations for use of electronic equipment and baiting of wildlife for purposes of hunting.

This issue(s) can be addressed as part of this objective and strategy.

Thank you for your support of this objective and strategies.

Thank you for your support.

Thank you for your support.

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Baiting, hunting, and use of ORV's are not the equipment of a true sportsman and should be banned.

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</table>
Use of electronic devices to hunt or kill predators is to be made illegal - absolutely NO allowances for hunters to use electronic devices to key off of any and all tracking devices or collars of any predator animals. This issue(s) can be addressed as part of this objective and strategy.

Use of electronic equipment and hunting of wildlife for purposes of hunting should not be allowed. That is not sportsman-like and not part of what should constitute hunting. This issue(s) can be addressed as part of this objective and strategy.

Use of electronic equipment should be prohibited. It's unlawful to spot wildlife from an aircraft & then go hunt them. It should be unlawful for a "spottor" at a vantage point to call his friends on a cell phone or radio to let them know where they are in relation to the wildlife they are hunting; this is not fair chase. Neither should baiting be allowed - it's not fair chase either. Why should there even be a debate on these issues? Not everyone agrees on these issues as described in the issue statement. However, all of these issues can be addressed as part of this objective and strategy.

Washington hunting regulations require muzzle loading firearms to have the primer exposed to the weather. It rains a lot during hunting season and primers get wet and don't fire, powder gets damp and causes the bullet to hit low and wounds a lot of animals instead of killing with a clean humane shot. Allow retractable broadheads for hunting big game animals to provide a better blood trail to find wounded animal and in-line muzzle loaders with 209 primers and scopes and save deer and elk from a long lingering death. Allow .22 caliber center fire firearms and crossbows with scopes and high powered air rifles for hunting in urban areas with human/wildlife damage and conflicts where high power firearms cause people concerns about hunting in developed areas to help remove excess wildlife that cause damage and problem for landowners. Traditional hunters can still use primitive equipment during archery & muzzle loader seasons if they want to. All of these issues can be addressed as part of this objective and strategy.

We keep incorporating more ways to take the advantage away form the game and putting into the hands of the hunter not always going to create a better experience and moves even more to those who have the means to purchase this equipment to have the advantage over other hunters. Limit the use of this equipment. This issue(s) can be addressed as part of this objective and strategy.

We need to get better baiting allowed again. This is a good idea for a better tool. We use baiting for youth with disabilities and with our in this their wouldn't be able to enjoy in the hunt This issue(s) can be addressed as part of this objective and strategy.

Why “facilitate debate” – how about doing your job to educate. Things like electronics and hunting have limited roles in sport hunting for most species. On the other hand, I would welcome a debate on hunting for bears as well as bow hunting. You need to look at the biology of the species more and less at the opinions of manufacturers of the latest gimmicks – and also less to the urban public that needs education. Initiatives should be illegal and wildlife management should be mandated to be decided by wildlife professionals in WDFW through the commission. Science not politics. In the debate, we do educate and provide any supporting information necessary for helping the public make informed comments and recommendations. The rest of your comment is a Legislative issue and the only way to change the current law is through them or the initiative process. Science only informs the debate and the decision makers. This issue(s) can be addressed as part of this objective and strategy.

Why debate it every three years, take a stand and stay with it, there is no need to rehab it over and over and over. It is the hunting public and others that continue to ask for this issue to be considered and decided. This issue(s) can be addressed as part of this objective and strategy.

Why is it necessary to even do this. The hunter already has a gun, scope, etc. Isn’t that enough? Why spend the money and time to debate. WDFW has had years of comments on both sides. Pick some GMOs that allow the use of electronic equipment and baiting and others that restrict it and be done with all the haggling. Just be sure to give both types of hunters a fair opportunity to get game - i.e. it will not succeed if electronic equipment and baiting is allowed only in areas where there is very little game to be harvested. This issue(s) can be addressed as part of this objective and strategy.

Why? - game regulations need to be based on science not personal opinions. Why debate it every three years, take a stand and stay with it, there is no need to rehab it over and over and over. It is the hunting public and others that continue to ask for this issue to be considered and decided. This issue(s) can be addressed as part of this objective and strategy.

Wildlife should never be baited for hunting. This issue(s) can be addressed as part of this objective and strategy.

Would like to allow GoPro type cameras to be attached to bows. This issue(s) can be addressed as part of this objective and strategy.

Yes! I am totally against baiting elk and deer. I have no position on bear or coyote/fox. Yes, bring back theroke duck. Why should WA hunters be penalized when most other states do not. This issue(s) can be addressed as part of this objective and strategy.

Yes, this is a good idea. Bear baiting should be legal again, it provides you to time adequately judge an adult bear and observe if there are cubs present. This is an issue for the Legislature because it is state law. The Commission is not authorized to change this law.

**Objective 7: Improve compliance rates for common violations.**

**PUBLIC COMMENT**

**WDWF RESPONSE**

The Dept needs to push aggressively for prosecution and conviction of poachers, and push the State Attorney General to pursue cases when local prosecutors demur. The issue is really something to address public relations through our enforcement program and we continue to address prosecution and conviction for fish and wildlife violations and appreciate your support.

We believe that this objective and strategies will be effective at addressing lead toxicity issues related to wildlife.

Yes, this is a good idea. Bear baiting should be legal again, it provides you to time adequately judge an adult bear and observe if there are cubs present. This is an issue for the Legislature because it is state law. The Commission is not authorized to change this law.

**WDFW RESPONSE**

The Department should join with California and work with the Legislature to ban lead ammunition. Attorney General to pursue cases when local prosecutors demur. The Dept needs to push aggressively for prosecution and conviction of poachers, and push the State

**WDFW RESPONSE**

This is an issue for the Legislature because it is state law. The Commission is not authorized to change this law.

The issue is really something to address public relations through our enforcement program and we continue to address prosecution and conviction for fish and wildlife violations and appreciate your support.
Good objective, what's the plan? Is WDFW going to send emails or mail out regulation reminders to licensed hunters each year, or require refresher training periodically?

Hard to do when enforcement staff is cut. Regulations should be re-evaluated, & concentration of the more serious violations should take priority. Minor violations facilitating revenue enhancement should be lowest on the priority list.

Have a sliding scale of rates based on the number of violations a person has over the course of their lifetime.

Hit em hard. These rules and laws are sacrosanct to stop, letting a few make us all look foolish.

I agree with this objective, depending on how one might improve the compliance rates.

I suggest that many people do not buy the proper licenses and tags is due to the cost. Also, the hunting regulations are way to many. The average person is not going to be current on them. You need to simplify the regulations. Keep adding every year.

I think overall kids who grow up around guns respect them & have less accidents, we need to promote hunting to younger kids.

If you see common violations a lot then there should be a training or class they have to go thru to get there license back for get the fine.

Improve compliance for all violations - ban on hunting any species by any means FOREVER!!!

In recent memory I can think of no positive interaction with WDFW. Always in the field assuming the public is at fault. This is very important. Critical for the viability of all our wildlife in Washington State.

Increase compliance rates for common violations.

Increase fines and penalties for these violations and increase enforcement of GAME VIOLATIONS. Our Wildlife Enforcement Division Spends too much time enforcing other laws, DUI, BUI, speeding, accident assistance etc.

Increase fines significantly and include jail time as an option for punishment.

Penalties to 100,000 X worse than today. Lifetime ban for poachers. $1,000,000 fine for each poached animal.

Make regulations simpler to improve compliance. Do not like "common" violations reference.

Common violations are ticky-tacky and do not affect game populations. Instead improve compliance for serious or REAL violations. Example of ticky-tacky violation, not having projectiles on carcase, tag on the smaller chunk of meat, tag with head not with meat, not enough orange, didn't sign license. REAL violations - shooting out of season without a license.

Make the regulations less complicated and the public will comply with the regulations.

Make the violation fines higher to hopefully slow down the poaching.

More enforcement officers would be needed for this. Would the Dept. Budget support?

You should be fines and have to go thru a course to get license back. This is the best way to stop poaching.

More important to do this than have FW Police enforce drug and drunk driving rules.

Only go after the real criminals, don't come down hard on some one who makes an honest mistake and then let people who poach and sell wildlife for money off with a slap on the wrist.

Patrol popular hunting areas. I've been hunting in Washington since 1987 and have never been checked. I hunt big game and small game. Never once checked. Go fishing, though, and you get checked constantly. Put as much emphasis into hunting enforcement as you do fishing.

Publish estimates of poaching. Press harder for trials of suspects of killing endangered species.

Simplifying the rules, to match national trends and rules. I.e. use of mechanical broadheads.

Strongly agree. Especially hunters driving and camping on non green dots roads. It's an epidemic.

The enforcement of current law is appropriate.

There should be fines and loss of future hunting licenses for those "taking two with a license for one". confiscation of the "extra" animal is not a deterrent against poaching.

This is true, but WDFW needs to eliminate rules/requirements that are not necessary or useful in protecting wildlife resources.

This is very important. Critical for the viability of all our wildlife in Washington State.

WDFW needs to more efficiently enforce the current rules. (including laws regarding "conservation of the wildlife resources")

Would be great. Of course, need funding to ensure some desired level of compliance.

Yes but again easier to understand.

Public Comment

A. Lead Ammunition Poses a Significant Risk for Avian Species

Data show that the terrestrial species of birds have been poisoned by spent lead from ammunition. Mourning doves are particularly susceptible to ingesting lead shot pellets, and lead poisoning may kill potentially millions of doves per year in the United States. Fisher et al. (2006) listed fifty-nine terrestrial bird species worldwide that have been exposed to lead from ammunition sources, including raptors, galliforms, gruiforms, columbiforms, and gulls. Fisher et al. (2006) reviewed published literature on lead poisoning of 32 species of wild birds in the United States from spent lead ammunition. Documented cases of ingestion and poisoning by lead from ammunition in terrestrial birds globally include 33 raptor species and 30 species from Gruiformes, Galliformes and Columbiformes. Our agency is committed to reducing the availability of lead to wildlife, and has taken proactive regulatory steps over the past 30 years in response to documented problem areas identified in Washington.

We believe that the approach outlined offers the best strategy to reduce lead availability during the six-year period of the proposed management plan. In addition, there are much higher levels of wildlife mortality, especially birds, caused by a variety of issues other than lead ammunition such as wind and fires and feral cats. Efforts to reduce significant mortality should include those issues.
Spent lead ammunition is uncontrolled and lead remains widely encountered and distributed in the fetuses and the young. This exposes many migratory birds that prey or scavenge on targeted wildlife to lead's toxic effects. Lead can cause neurological damage, and there may be no safe level of lead in the body tissues of these birds. Ingestion of lead by these birds can lead to chronic sub-lethal effects of lead poisoning from scavenging meat containing lead fragments from ammunition. Another source of significant lead exposure is from spent lead shotgun pellets, which accumulate in both aquatic and terrestrial habitats, where migratory birds encounter and ingest them, often mistaking them for food, grit or bone fragments. Ammunition manufacturers now market a wide variety of non-lead or less toxic bullets and shotgun pellets that can replace lead ammunition. The availability, performance, and affordability of non-lead ammunition have never been as high. The management plan rightly states that a piecemeal approach when the science is so clear is not the way to address this important issue and aiming to reduce the use of lead ammunition for hunting. We urge the WDFW to amend Objective 8 to require the use of non-toxic ammunition for hunting.

Objective 8: Require Non-Toxic Ammunition for Hunting

We want to thank the Washington Department of Fish and Wildlife (WDFW) for addressing the serious threats posed by the use of lead ammunition. The management plan rightly states that a piecemeal approach is not the way to address this important issue and aiming to reduce the use of lead ammunition for hunting. We urge the WDFW to amend Objective 8 to require the use of non-toxic ammunition for hunting. The WDFW is considering voluntary programs, which allow toxic lead ammunition to be dispensed throughout the environment with no accountability from those who refuse to use non-lead ammunition. Just one ingested lead shotgun pellet or bullet fragment is enough to cause brain damage in birds, resulting in inhibition of critical neuromuscular, auditory, and visual responses.

Voluntary programs, as the WDFW is considering, still allow toxic lead ammunition to be dispensed throughout the environment with no accountability from those who refuse to use non-lead ammunition. Just one ingested lead shotgun pellet or bullet fragment is enough to cause brain damage in birds, resulting in inhibition of critical neuromuscular, auditory, and visual responses.

Regulatory action has proven effective, as millions of animals have been saved through a single mandatory non-lead ammunition requirement. In 1991, the use of lead shot in hunting migratory waterfowl was phased out by the U.S. Fish and Wildlife Service after biologists and conservationists estimated that roughly 2 million ducks died each year from ingesting spent lead pellets. And last year, California passed legislation to phase out lead ammunition used for hunting, citing not only harmful effects to the endangered California condor, but to other species as well. This led to manufacturers announcing an increase in production of non-lead ammunition to meet the growing demand.

Many hunters support the use of nontoxic ammunition and millions of hunters already use it. The availability, performance, and affordability of non-lead ammunition have never been as great as it is today. Many government entities like the U.S. Army and the National Park Service have already made commitments to eliminate their use of lead ammunition, citing environmental and animal welfare concerns. The WDFW should implement a similar policy to require the use of nontoxic ammunition for department activities.

Furthermore, lead is a dangerous toxin to humans when consumed. Individuals who consume meat from animals killed with lead ammunition are at risk for lead exposure. Several studies using x-ray imaging have shown lead ammunition is highly fragmentable and nearly impossible to completely remove from meat, even after professional cleaning. The WDFW is considering the poisoning of wildlife at the hands of hunters and there is no reason to take a piecemeal approach when the science is so clear. A reasonably-paced regulatory switch from lead to non-lead ammunition will provide greater protection for Washington's golden eagles and other wild birds from the dangers of lead poisoning.

Thank you for your comments. The WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. We did make some edits to the strategy on regulatory efforts that would allow more broadly based regulations but still implemented to address identified problems. Our agency is committed to reducing the availability of lead to wildlife, and has taken proactive regulatory steps over the past 30 years in response to documented problem areas in Washington. We believe that the approach outlined offers the best strategy to reduce lead availability during the six-year period of the proposed management plan.
Ingestion of lead by carrion scavenging mammals, such as coyotes, grizzly bears, black bears, wolves, wolverines and mountain lions feeding on varmint carcasses, and gut piles and carcasses of big game during the hunting season is a significant issue. Large carnivores such as black bears (Ursus americanus), grizzly bears (U. arctos), wolves (Canis lupus) and coyotes (C. latrans) scavenge to varying degrees on ungulate offal piles abandoned by hunters. Cougars (Puma concolor) may occasionally be exposed to led at biologically significant levels because of the tendency to occasionally scavenge. Rogers et al. (2009) have begun collecting samples of liver, hair, blood, and feces from black and grizzly bears, wolves, coyotes and cougars in Grand Teton, Wyoming, and tested samples for the presence of lead. Rogers et al. (2009) documented elevated lead levels in grizzly bears during hunting season, when they scavenge the remains of big game. Preliminary data by Rogers et al. (2009) showed that of 13 Grand Teton grizzly bears sampled during hunting season, 46% showed elevated blood lead levels above 10 µg/dl, while 11 bears sampled outside of hunting season had undetectable lead in their blood.

C. Lead Ammunition Poses a Significant Risk for Carnivorous Mammals

Ingestion of lead by carrion scavenging mammals, such as coyotes, grizzly bears, black bears, wolves, wolverines and mountain lions feeding on varmint carcasses, and gut piles and carcasses of big game during the hunting season is a significant issue. Large carnivores such as black bears (Ursus americanus), grizzly bears (U. arctos), wolves (Canis lupus) and coyotes (C. latrans) scavenge to varying degrees on ungulate offal piles abandoned by hunters. Cougars (Puma concolor) may occasionally be exposed to led at biologically significant levels because of the tendency to occasionally scavenge. Rogers et al. (2009) have begun collecting samples of liver, hair, blood, and feces from black and grizzly bears, wolves, coyotes and cougars in Grand Teton, Wyoming, and tested samples for the presence of lead. Rogers et al. (2009) documented elevated lead levels in grizzly bears during hunting season, when they scavenge the remains of big game. Preliminary data by Rogers et al. (2009) showed that of 13 Grand Teton grizzly bears sampled during hunting season, 46% showed elevated blood lead levels above 10 µg/dl, while 11 bears sampled outside of hunting season had undetectable lead in their blood.

Thank you for your comments. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. Our agency is committed to reducing the availability of lead to wildlife, and has taken proactive regulatory steps over the past 30 years in response to documented problem areas identified in Washington. We believe that the approach outlined offers the best strategy to reduce lead availability during the six-year period of the proposed management plan.
contamination of deer meat in the Minnesota venison donation program. The study assessed lead levels in deer and domestic sheep shot using different types of bullets and firearms commonly used for hunting.

Packets of venison shot with lead ammunition and donated by hunters to feed the hungry tested positive for lead contamination. Cornatzer et al. (2009) studied 100 randomly selected ground venison packages donated to the Community Action Food Centers of North Dakota by hunters. The packages were analyzed by high resolution computerized tomography imaging and x-ray fluorescence for detection of metal fragments. Analysis of randomly selected ground venison samples showed 59 packages out of 100 (59%) had one or more visible lead fragments. One sample had 120 ppm lead. Cornatzer et al. (2009) concluded there is a health risk if lead exposure to humans consuming ground venison. Pain et al. (2010) found that eating the meat of animals hunted using lead ammunition can be more dangerous for health than was previously thought, especially for children and people who consume large quantities. Pain et al. (2010) analyzed the meat of six species of game birds (red partridge, pheasant, wood pigeon, grouse, woodcock and mallard) shot by hunters in the United Kingdom, and found that lead levels in cooked game meat exceeded the maximum allowances set by the European Union, due to the presence of remains of ammunition, even after lead pellets were removed. Depending on the species and type of recipe used, between 20% and 87.5% of the samples analyzed exceeded 100 parts per billion of the fresh weight of meat.

Cabella's (2009) showed that using bullets with no exposed lead (a copper case completely surrounds the lead core) or bullets made of copper significantly reduce (or eliminate) lead exposure.

**D. The SEIS Must Describe the Viability of Mitigation Measures In Order to Reduce a Project's Significant Impacts**

The SEIS puts forward a range of strategies that will ostensibly mitigate the impacts of toxic lead ammunition. Unfortunately, the SEIS fails to describe whether the strategies will feasibly function to actually mitigate impact or whether these voluntary and vague mitigation measures will not actually mitigate the impacts of the program. Furthermore, given the significant impacts of lead pollution the Washington Department of Fish and Wildlife should adopt mandatory programs to reduce protect nontarget wildlife and people. The SEIS puts forward four strategies to reduce toxic lead exposure:

- a. Develop voluntary programs to encourage hunters to utilize lead alternatives.
- b. Work with hunters to develop local restrictions that are supported and effective at reducing lead poisoning of wild birds.
- c. Develop an outreach plan that helps hunters understand the lead ammunition issues and gain support for reducing the use of lead for hunting.
- d. Promote use of non-toxic ammunition for department activities, where applicable.

(SEIS at 25). None of these measures have any standards to determine whether pollution from lead ammunition will be decreased or whether the goals of reducing lead ammunition pollution will be achieved. For example, in developing voluntary programs there are no targets, standards, or monitoring mechanisms to measure the effectiveness of the mitigation. Outreach and promotion of alternatives, while an important part of the program, cannot assure the types of reductions necessary to reduce significant lead pollution. The Washington Department of Fish and Wildlife should institute a statewide ban on lead ammunition and lead shot in order to help assure that non-target wildlife and people are subject to lead poisoning. California has successfully enacted a statewide ban after a partial proved ineffective in reducing the poisoning of the California condor. Washington Department of Fish and Wildlife should analyze an alternative of banning lead ammunition in the state in order to reduce the significant impacts of its program.

**Oppose objective / strategies**

Thank you for your comments. The level of mitigated impacts from the strategies are not known, they are also not known for a complete ban on lead ammunition. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. Our agency is committed to reducing the availability of lead to wildlife, and has taken proactive regulatory steps over the past 30 years in response to documented problem areas identified in Washington. We believe that the approach outlined offers the best strategy to reduce lead availability during the six-year period of the proposed management plan. Please see previous comments on population level impacts of lead on wildlife populations.

**Support objective / strategies**

a. Develop voluntary programs to encourage hunters to utilize lead alternatives.
   - WDFW has been working to provide additional educational information about lead poisoning on our web site and in our pamphlets.

b. Work with hunters to develop local restrictions that are supported and effective at reducing lead poisoning of wild birds.
   - WDFW has been active hunter recruitment and retention programs.

c. Develop an outreach plan that helps hunters understand the lead ammunition issues and gain support for reducing the use of lead for hunting.
   - WDFW has been working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas.

d. Promote use of non-toxic ammunition for department activities, where applicable.
   - WDFW has active hunter recruitment and retention programs.

**Public** reports on the agencies studies and findings, to educate the public.

Thank you for your support, your issue is addressed in strategies b and c.

| (#5 comments) Support objective / strategies | Common house cats are more dangerous to wild birds. |
| Support for reducing the use of lead for hunting |
| Czar evidence showing this is problematic needs to be demonstrated prior to any restrictions being placed on ammunition. |
| Don’t happen that in the 80’s with waterfowl seasons? Lead is less expensive than alternatives, providing the hunter with more money left in his pocket to purchase his licenses and perpetuate the jobs of those who don’t really want hunters, only their money. |
| Disagree |
| First prove that lead rifle and pistol ammunition actually affects wild birds, don’t just bend to the questionable motives of environmental groups. |
| I am opposed to blanket coverage for the use of non-toxic shot. If it is required, it should be only for areas where documented issues exist. I don’t agree with closing general land areas just because someone "thinks" there may be an issue or because the land is managed by an agency and that is there general policy. |
| I do not believe that the availability should be reduced. The use should be reduced and penalties for non-compliance should be increased. |
| I have seen no conclusive evidence regarding the lead issue associated with birds and a direct link to ammunition and there fore do not support the restriction of lead ammunition other then steel shot for shotguns which should be state wide. |

| (#12 comments) Oppose objective / strategies | Pain et al. (2010) studied 100 randomly selected ground venison packages donated by hunters to feed the hungry tested positive for lead contamination. |
| No one disputes that lead ammunition is dangerous to wildlife, and people are subject to lead poisoning. California has successfully enacted a statewide ban after a partial proved ineffective in reducing the poisoning of the California condor. Washington Department of Fish and Wildlife should analyze an alternative of banning lead ammunition in the state in order to reduce the significant impacts of its program. |
| The level of mitigated impacts from the strategies are not known, they are also not known for a complete ban on lead ammunition. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. Our agency is committed to reducing the availability of lead to wildlife, and has taken proactive regulatory steps over the past 30 years in response to documented problem areas identified in Washington. We believe that the approach outlined offers the best strategy to reduce lead availability during the six-year period of the proposed management plan. Please see previous comments on population level impacts of lead on wildlife populations. |
| Your concerns are entirely consistent with strategies a, b, and c. |
| WDFW has been working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. |

| (45 comments) Support objective / strategies | Pain et al. (2010) studied 100 randomly selected ground venison packages donated by hunters to feed the hungry tested positive for lead contamination. |
| Thank you for your support. Your issue is addressed in strategies b and c. |
| WDFW has been working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. |
| WDFW has been working to provide additional educational information about lead poisoning on our web site and in our pamphlets. |
| WDFW has been working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. |
| WDFW has been working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas. |
| WDFW has been working to provide additional educational information about lead poisoning on our web site and in our pamphlets. |
I think the use of lead ammunition should require a lifetime ban on hunting in WA State and the confiscation and destruction of a hunter's gear on the first offense.

I would like to see the studies first to make the determination.

If that is done, then make sure non-toxic substitutes are readily available. I own a 28 ga. single, and will gladly hunt with something other than lead, if I can find an available replacement ammo, without having to order cases from the www, and pay shipping for a hazardous shipment or drive out of state to find ammo.

If you can show that's where it is coming from then all for it_shoots straight out there if there is a problem somewhere else.

Reducing lead availability and use, how about educate bird hunters. Reduce availability sounds like a ban to me.

Is lead ammo really a problem outside of wetlands?

Just another way to control and fine us. Where is your proof?

It is difficult to establish where birds go; all lead ammunition should be phased out.

Lead ammo not the biggest problem. Timber companies spraying poisons it is!! There have not been sufficient studies conducted to respond to this comment.

Lead ammunition must be abandoned it is not consistent with the anti-lead/pollution policy of this country. Thank you for your perspective and concern.

Lead ammunition needs to be banned in the entire county, so let's start with WA state. It poisons not only birds, but endangered animals and even people. Why is switching to non-lead bullets so controversial?

Lead ammunition should be banned for target practice as well as hunting. Shotgun shells are left discarded, with hundreds littering the likes of, for example, Fir Island in Skagit County. Thank you for your perspective and concern.

Lead ammunition should be banned. Not just where we think poisoning of birds is problematic. In many situations, lead has not been shown to be problematic in terms of causing declines in wildlife at a population level. However, there are some specific situations where it is problematic such as with condors and other birds of prey. But there are also many issues with the availability, cost, and use of non-lead alternatives. The Department thinks that our objectives and strategies are appropriate for the term of this plan.

Lead ammunition should be phased out altogether. We think that our objectives and strategies will address the problematic issues in a phased approach.

Lead poisoning of wild birds and other species is problematic almost everywhere. In time to get the lead out. Thank you for your perspective and concern.

Lobby legislators for new stricter laws. Thank you for your support.

Nice...but you refuse to address the unavailability of non-toxic shot alternatives. Availability of non-lead alternatives is affected by demand. More alternatives are currently available since restrictions have been phased in over 25 years.

Not just reduce the availability, eliminate further use of this toxic substance for all shotgun use in hunting. And on WDFW owned property, eliminate it use in target shooting, including clay or other targets. Thank you for your perspective and concern.

Only if there is documented food poisoning at that site. Not if it’s merely speculated. That is what this objective and strategies address. Thank you for your support.

Problematic is not fixed. Before you mandate restrictions on lead ammo provide evidence that is convincing, not problematic.

Reduce all lead ammunition. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas.

Reduce PERMANENTLY and TOTALLY. Lead has NO place in ammo or the environment - period!! Thank you for your support.

Reduce the availability? What is meant by that? We are changing the language in the objective to better define the meaning of availability.

Remove lead from the environment, Thank you for your support.

Remove the word availability, it threatens hunters ability to purchase leaded ammunition. Post in game laws where lead is prohibited. WDFW does not have authority to restrict ammunition sales. WDFW has been working to provide additional educational information about lead poisoning on our web site and in our pamphlets.

Scientifically prove bird poisonings in any area being considered for this type of regulation. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas.

starting immediately, a five year period should be commenced to phase out all lead hunting ammunition use, except waterfowl, upland game, and quail, time for hunters to use it up.

steel shot was introduced on ducks and geese, why not just say for all birds?

The cost of ammunition is already high. To ban lead ammo would further increase the cost of ammo. What would we do without traditional muzzleloaders? What about old Doubles or Mod 12’s etc. that we still hunt upland game with. There is very little or no evidence showing need to expand beyond where we now consider. Consider all of the hunters with lead ammo or components now. To ban lead for big game hunting would be going to solids, which are armur piercing. Don't follow California in this, as there next step is step to ban hunting as we so it altogether.

There should be NO hunting with lead ammunition. Other products are available. This gets into the food chain no matter what is shot. Thank you for your support.

These are a very good start. I understand the hunters have to be brought along. I would like to see regulations as soon as possible. Lead poisoning does sicken and kill raptors and lead shot can cause problems for waterfowl such as swans.

This is already done, there is no need for this to be an objective. Upland bird hunters usually shoot very infrequently 0-10 times per day. I would expect most lead poisoning is from target shooters who would shoot 25-100 rounds per outing. DO NOT increase lead restrictions on upland bird hunters. Thank you for your support of this objective and strategies.

This is the most important for big game hunting and waterfowl. The waterfowl threat is largely gone now with over 20 years of required non-toxic shot, but lead fragments in big game flesh, including gut piles, remains a significant threat to eagles, vultures, other raptors, and the entire guild of avian scavengers, especially ravens, crows and magpies. I have switched to Barnes copper bullets in my .270.

This issue is already addressed with current state and federal regulations. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas.

This should be done for waterfowl and release sites only. There is no reliable scientific evidence that hunting upland game in open areas with lead is bad for either the game or the human participant. The attack on lead ammunition is a concerted effort by anti-hunting organizations to pick at hunting piece by piece until there's nothing left. Do not yield to these sentiments through concession of unreasonable restrictions on hunters. WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas.

why? WDFW is working on a voluntary and educational approach, and well as regulatory actions to eliminate lead poisoning in documented problem areas.
Objective 9: Increase public understanding and acceptance of treaty hunting rights.

PUBLIC COMMENT

WDFW RESPONSE

and again good luck.  Thank you for your comment.

You already have lead bans in water fish areas. Keep it up and fishermen will not have lead for

(24 comments) Good/yes/agree

You have got to be kidding? The lead ammunition debate is ridiculous and ludicrous.

(5 comments) No/Disagree

This is an issue that was important to many.

A better solution would be to remove the rights for off reservation hunting, making them the same

(5 comments) I WILL NEVER ACCEPT THIS RULING. Let them hunt with the same methods

That would be part of strategy c.

As long as people think that some native americans are abusing there treaty rights and then

Agreed, Would be nice if the WDFW could post their seasons and limits so when we are afield

That would be part of strategy c.

Agreed, however, I don't think there will be an overall acceptance of this given the track record tribal

You can prohibit lead shot on birds but keep your government hands off the availability and other

Robert Canfield has. For example, constantly shooting large trophy bulls and elk on winter range,

A Definitive no! I hope this can come along with the fair litigation debate. This issue isn't strictly one for WDFW. Management of national forests national parks are ongoing and upcoming, and many citizens who know little about treaty hunting, fishing and gather produce much more heat than light. How to enhance public understanding and then acceptance cannot be borne only by WDFW. Partnerships can help.

Definitely do! We have the right to hunt in our country, not just one state or another.

Devote web space to discussion of treaty rights. Sponsor regional meetings with tribal nation

The web page has been available for many years. We will consider the use of tribal speakers in future public meetings to address issues.

Don't bother - They will abuse them, even if the public has a better understanding of what they are

Thank you for your comment.

Don't waste your time or money, there's much more important issues

Don't waste your time or money, there's much more important issues

Education

Thank you for your support.

Fine, but prohibit roadside selling of what they take for sustenance and make them subject to same

In most cases, commercialization of game is not permitted by tribal regulations, so again this activity should be reported to tribal authorities.

Fix management and save our big game. Don't waste your time with this stuff.

Thank you for your comment.

Furthermore, having completed data from Tribal co-managers as to what the harvest rates on animals such as deer and elk from tribal members. It should be mandatory for them as it is for others that obtain licenses, otherwise be penalized as the general sportman's are.

Actually several tribes have enacted mandatory reporting regulations. Your comment is more consistent with the issues identified in objective 16.

Good idea. Also work with tribes to try to get a more coordinated approach to maintaining species' health in Washington.

The web page has been available for many years. We will consider the use of tribal speakers in future public meetings to address issues.

Good luck with that! You first have to figure out how to successfully monitor the tribal hunters and fishermen.

You have got to be kidding? The lead ammunition debate is ridiculous and ludicrous.

Most tribes have regulations for hunting a

Thank you for your support.

Many tribes have regulations for hunting and fishing. There is a large Hispanic group that hunts the same area and they bring along

Thank you for your support.

Agreed, it seems that the treaty hunting rights are abused by some individuals now.

Thank you for your support of this objective and strategies.

Agreed, however, I don't think there will be an overall acceptance of this given the track record tribal members have. For example, constantly shooting large trophy bulls and elk on winter range, littering, driving drunk on state lands and not being prosecuted for such violations.

Thank you for your comment. If you observe this activity, you should report it to the appropriate authority.

At least double the bag limits and 10 times the season, I can understand that.

Thank you for your comment.

Bolt was an idiot. How free and none segregated can a country be if we still have treaties in place.

Thank you for your comment.

Control treaty hunting by gating more roads.

Protection of winter range from disturbance is becoming a more important issue across the west. This is an example of where the state should work with tribes to seek common understanding and support, which comes under the next objective.

Could care less about this; I don't want the limited resources being wasted on this.

Thank you for your comment.

Definitely do! We have the right to hunt in our country, not just one state or another.

Thank you for your support of this objective and strategies.

Devote web space to discussion of treaty rights. Sponsor regional meetings with tribal nation speakers featured.

The web page has been available for many years. We will consider the use of tribal speakers in future public meetings to address issues.

Don't bother - They will abuse them, even if the public has a better understanding of what they are supposed to do.

Thank you for your comment.

Education

Thank you for your support.

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The web page has been available for many years. We will consider the use of tribal speakers in future public meetings to address issues.

Good luck with that! You first have to figure out how to successfully monitor the tribal hunters and fishermen.

Most tribes already do that.

Greater public education, by tribes and the agency, needs to be dedicated towards a better public understanding of the impact and role that tribes play in conservation, habitat protection, and game management.

Most tribes have regulations for hunting and fishing. There is a large Hispanic group that hunts the same area and they bring along

Thank you for your support.

I agree with increasing public understanding, and awareness. However, I believe that these treaties need to be adjusted. As it is, Native Americans are 'entitled' to 50% of the wildlife in Washington, while making up a much smaller portion of the population! That's absurd!

These are Federal treaties and can only be changed by Congress.

I don't agree with the Bolt decision, or other agreements of that nature. They are what we have agreed to. Any PR campaign is a waste of tax dollars.

Thank you for your comment.

I hunt area 342 for elk. There is a large Hispanic group that hunts the same area and they bring along many problems.

This is illegal and if you observe this, please report it immediately to the Department’s poaching hotline.

If Indians want to use or initiate now and arrows made from stone then more power to them. But if they are out using 50cal to hunt whales and just butchering deer for the hindquarters then end their "privileges". This is the 21st century. They shouldn't be able to use modern methods and they no longer subsistence hunt.

Most tribes have regulations for hunting and wasting of animals is generally not permitted. If you have solid information that can be investigated, it should be reported to tribal enforcement.

Increase compliance and enforcement of those that abuse and misapply treaty rights.

Most tribes have regulations for hunting and wasting of animals is generally not permitted. If you have solid information that can be investigated, it should be reported to tribal enforcement.

If the best that you can do? Very weak objective. Licensed hunters are frustrated with tribal hunting because we feel powerless when we witness behavior that is illegal, unethical by any measure of hunter's code. Make a list of what is ALWAYS illegal, regardless of tribal or non-tribal. How about educating TRIBES about ethics and their image? Shooting in deep snow, in February, at feeding stations, will never be accepted by licensed hunters, even it is their "right" to behave this way.

If there are violations of law, they should be reported to the Department. As suggested in this objective, citizens often do not understand treaty rights.

It is hard to accept when you cave to special interest groups the tribes, at the expense of license holders who pay your salaries

These are Federal treaties and can only be changed by Congress.

It's hard for people especially sportmen and women to accept the season length and bag limits for deer and elk. Its especially hard to accept that they get to harvest el in areas where they did not even exist when the treaties were signed. There would not be any elk in a lot of areas if it were not for the sportmen and women getting them transplanted here. If tribal hunters want to hunt elk in areas that had no elk they should have to buy a state license just like the rest of us.

The courts have not distinguished any difference between species, the treaty right is related to hunting period.

Make the Indians go out and get a job and stop living off of federal support which non Indians have to pay for would be a good start.

Thank you for your comment.

Native Americans have prime availability to hunt but are to be regulated if predetermined level is reached. In all occurrences and situations Wildlife needs and sustainability comes first.

Thank you for your support.
No concerns about this objective but what's missing, particularly during these hot button access issues times is a comparable Objective: "increase public understanding and acceptance of private property rights and 'current use' taxation. I believe you understand the issues, but if it's good policy to educate hunters about treaty hunting rights it's equally important for WDWF to educate hunters about landowner rights, and what we believe is our "more fair share tax obligations". It's understandable to emphasize with hunters wanting to find/keep free access but I hear stories of WDWF personnel actually supporting "punishing" landowners that exercise their property rights more fully, or WDWF personnel echoing the false narrative that those in "current use" tax programs are somehow being subsidized by other taxpayers. I'm sure you don't condone WDWF personnel thinking/reasoning on a tough issue rather than becoming part of the solution - just as you are rightly trying to do in getting better hunter understanding of tribal rights. As FYI, those utilizing "current use" tax programs: 1) must pay "back taxes" and penalties if they drop out of the program; 2) pay far more in taxes than they receive in govt services - therefore subsidize other taxpayers; 4) forest land owners additionally pay an "excise" tax (harvest) tax that is no longer relevant or applied to any other "current use" eligible land owner; & 5) without "current use" tax programs there would be far less private land uses that are compatible with center habitat & hunter opportunities. I urge the department to at least reach out to Dept. of Revenue, Farm Bureau, WFPA, WFFA, to help your messaging with hunters, and your own personnel.

Thank you for your support. Issues related to private lands are addressed in a separate section of the plan.

No hunting rights for it is privilege at the cost of our wildlife

As described in the plan, treaty hunting rights are a part of federal treaties with Washington tribes. WDWF has no authority to change the rights reserved by tribes in federal treaties.

No. Treaty hunting rights must be coordinated with game management goals. If Indians are allowed to hunt with no quantity limits and no restrictions as to whom or how they hunt, it's stupid to plan for #5 above. With wolves now allowed to "hunt" elk and deer with no limits and Indians allowed to hunt elk and deer with no limits, what is left? Indians should be allowed to hunt in their treaty hunting grounds, for the species that were there when the treaties were signed (Rockymountain and Roosevelt elk etc). They should have to get a game tag(free) and License(free) and follow the same season and limits we non-treaty hunters have to follow. The state game biologists tell us the restrictions for brush antler, either sex hunts, and when to hunt, are to manage the herd numbers and if we are being told the truth, then the Indians should be held to the same standards we are!

Thank you for your comment. Your concerns support the need for this objective.

No, people are all residents of the State of Washington regardless of their creed and we all own the wildlife so there shouldn't be any benefits different from the white hunters.

The Federal treaties were designed to allow peaceful settlement of Washington. As part of the treaties, tribes reserved certain rights and hunting was one of the treaty rights.

No, The State should use its resources instead to ensure that tribal hunters do not over-step their bounds. We need better enforcement so that there is no tribal harvest on state or private lands -- there are no longer open and unclaimed. Tribal hunters may have rights on Federal lands outside reservations, but not on any other lands -- and even on Federal lands it should be debated and controlled -- and penalties should be severe.

Tribal hunters access to open and unclaimed doesn't include state lands. This is the type of information that might be good to get to citizens as described in strategy A.

No. The treaty hunting rights need to be brought up to today's standards of living. The treaties need to be burned at a large POW WOW!!!

Thank you for your comment.

Reevaluate the effect of treaty hunting on the game populations and publicize the results of the study however they turn out to be. Publish the stats just like you do for non-treaty hunters.

Many of the treaty tribes do report their harvest through the NW Indian Fisheries Commission. Those data are available through the link on the Department’s web site. In addition, the Department has conducted several mortality studies as well and those results are on our web site.

No, treaty hunting rights need to be brought up to today's standards of living. The treaties need to be burned at a large POW WOW!!!!

Thank you for your comment.

No, there is no need to accept the unregulated harvest of game populations. To suggest that the public should come to understand and accept this, only shows how out of touch WDWF really is with both our citizens and conservations. Unregulated was the key element to the destruction of our game herds preceding the settlement of the west. If it is the WDWF's position to replicate such disastrous policy, then I see no reason for any sportman or conservationist to support said organization. Furthermore, to allow certain individuals to harvest game unlicensed and unaccounted for, solely based on their race (ethnicity) is at best discriminatory and at worst completely bigoted. I do understand that some of the treaty rights are out of WDWF's control. However, that does not constitute the departments widespread support of such "rights".

The courts have suggested that conservation closures to prevent loss of a species are allowable, but it is a very high standard. In most cases if this situation is evident, we have been able to address the issue cooperatively with affected tribes. The best example is with the North Cascades elk herd recovery.

Spend more funds getting treaty rights overturned. Allowing tribes to purchase large tracts of land is not in the best interest of the State of Washington. Using state funds to support tribes isn't acceptable.

The Federal treaties were designed to allow peaceful settlement of Washington. As part of the treaties, tribes reserved certain rights and hunting was one of the treaty rights.

No hunting rights for it is privilege at the cost of our wildlife

The Federal treaties were designed to allow peaceful settlement of Washington. As part of the treaties, tribes reserved certain rights and hunting was one of the treaty rights.

Hunting by tribal members is completely bigoted. I do understand that some of the treaty rights are out of WDWF's control.

The courts have suggested that conservation closures to prevent loss of a species are allowable, but it is a very high standard. In most cases if this situation is evident, we have been able to address the issue cooperatively with affected tribes. The best example is with the North Cascades elk herd recovery.

That is going to be an uphill battle. Any chance of gaging large areas of winter range and not letting natives have keys to the gates? And is there any way to convince the Yakima tribe to provide harvest reports so that game can be better managed.

The courts have suggested that conservation closures to prevent loss of a species are allowable, but it is a very high standard. In most cases if this situation is evident, we have been able to address the issue cooperatively with affected tribes. The best example is with the North Cascades elk herd recovery.

The Department might be able to brain wash the millennials, but this objective will never happen with those in my generation. I'm a native American, born and reared in this country and am entitled to all rights that other citizens have to game. This is one nation, not two or three or four.

These are Federal treaties and can only be changed by Congress.

The public does need to have a better understanding of this topic. Not only what the rights are, give us the information on why they have these rights and how this gets interpreted. Education is the beginning for understanding.

These are Federal treaties and can only be changed by Congress.

The public should never accept the unregulated harvest of game populations. To suggest that the public should come to understand and accept this, only shows how out of touch WDWF really is with both our citizens and conservations. Unregulated was the key element to the destruction of our game herds preceding the settlement of the west. If it is the WDWF's position to replicate such disastrous policy, then I see no reason for any sportman or conversationist to support said organization. Furthermore, to allow certain individuals to harvest game unlicensed and unaccounted for, solely based on their race (ethnicity) is at best discriminatory and at worst completely bigoted. I do understand that some of the treaty rights are out of WDWF's control. However, that does not constitute the departments widespread support of such "rights".

These are Federal treaties and can only be changed by Congress.

No there is no way a non-tribal member can understand the wholesale slaughter of the game animals by the tribes, it is simply sickening.

Thank you for your support.

No there is no way a non-tribal member can understand the wholesale slaughter of the game animals by the tribes, it is simply sickening.

Thank you for your comment, however most tribes have regulations against wastage of game animals. And they encourage violations to be reported.

No hunting rights for it is privilege at the cost of our wildlife

As described in the plan, treaty hunting rights are a part of federal treaties with Washington tribes. WDWF has no authority to change the rights reserved by tribes in federal treaties.

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No there is no way a non-tribal member can understand the wholesale slaughter of the game animals by the tribes, it is simply sickening.

Thank you for your comment.
This is an issue that the agency has some responsibility but the tribes need to step up and have a major involvement. The public currently sees the tribes as a group without any control and given unlimited access to the resource without accountability.

Part of that perspective may be a mis-perception which is what this objective is trying to address.

This is important before decisions are made.

Thank you for your support of this objective and strategies.

This would be a sore spot with hunters, as they see natives not following game laws themselves.

That is why we have identified this objective and strategies.

These treaties were written and signed to make it possible for all citizens to hunt and fish in common, with each other. Meaning these tribes gave up any special rights to having different seasons, licensing, or number or type of game they should be allowed. If a person reads the wording of the treaties it claims that all citizens shall fish, hunt, wild game, whales, seals and such in common with other people in the territory. It doesn't say that there should be two or more classes of people, having majorly different rights and or treatment.

Treaty hunting rights are fine...its all the other participants who need education...especially about poaching and the consequences need to be stiffened for all.

Thank you for your comment.

Plan with the real words undocumented tribal harvest.

Thank you for sharing your perspective.

Two sets of rules will never be accepted by the public...example...Using public funds to subsidize commercial fishing while netters are still aloud to net. What the hell is that all about. You have de novo management plans outline behavior with policies that are not legal at all. This "good old boy" system is crap and everyone knows it.

As described in the plan, treaty hunting rights are a part of federal treaties with Washington tribes. WDFW has no authority to change the rights reserved by tribes in federal treaties.

Very low priority

Thank you for your comment.

We understand that there are some who abuse their rights to the detriment of our wildlife populations, especially elk, deer, and bear. It would benefit both tribal and state hunters to emphasize the not only legal, but ethical harvest of game animals. More needs to be done by the WDFW to encourage biologists to be more concerned with the activities of their members when continued multiple harvests of our wildlife are tolerated. As well, the sale of meat and parts needs to be stomped out by both tribal and state LE and we need to better support the LE in the field to achieve this goal.

Why can't we work more towards one management agency with more visible joint goals.

That is part of the rationale for objective 10.

This is crap. We should have equal rights to hunt on reservation property that they have to hunt on our property. Regulation should be equal. It is a huge State sanction race discrimination.

Yes this is crap. As described in the plan, treaty hunting rights are a part of federal treaties with Washington tribes. WDFW has no authority to change the rights reserved by tribes in federal treaties.

Yes...this is a very tense topic that just needs more education and public awareness.

Thank you for your support.

We agree completely.

Yea this is crap. As described in the plan, treaty hunting rights are a part of federal treaties with Washington tribes.

This is a challenge however there are plenty of opportunities to work with interested strategies.

We do work with the tribes on many issues of mutual interest. This is actually part of objective # 10.

Agreed, but we will continue to ask landowners to work with the Department to address multiple interests and issues to help deal with property damage.

Yes, all part of the strategies identified in this objective.

And we know what this management plan is. It is not the people buying there license every year. That is why we have identified this objective and strategies.

We understand, so the agreements are posted on our web site.

Complete your plans -- but tribal members should have more than any other people. Wildlife is owned by the State (not the Feds unless ESA or migratory birds) and the State has no treaties with the tribes allowing them harvest. If they want to be "sovereign nations" let them hunt in their nations.

These are Federal treaties and can only be changed by Congress and federal law supersedes state law.

Agreed, and you do not have many smart or poorly managed agents.

We will look into this. Thank you for your support of this objective and strategies.

Department needs to be more proactive and act with increased awareness.

Thank you for your support of this objective and strategies.

Part of that perspective may be a mis-perception which is what this objective is trying to address.

The Department treats access equally for everyone.

Thank you for your comment.

We understand, so the agreements are posted on our web site.

Complete your plans -- but tribal members should have more than any other people. Wildlife is owned by the State (not the Feds unless ESA or migratory birds) and the State has no treaties with the tribes allowing them harvest. If they want to be "sovereign nations" let them hunt in their nations.

These are Federal treaties and can only be changed by Congress and federal law supersedes state law.

Do not give any tribes extra hunting percs like keys to gates and easy access to lands that the general public has to walk into. They have enough advantage now.

The Department treats access equally for everyone.

Everyone needs to be managed equally.

These are Federal treaties and can only be changed by Congress.

Good luck regulating tribal plans. The state has no authority. Without the authority a joint management plan is useless.

Thank you for your comment.

You are welcome.

Good Luck, my guess is the tribes want the non-members to have quotas but not the tribal members. So to the area by the Reserve North of Ellensburg and you will see what I mean.

Thank you for your comment.

On the river was a young elk. We saw where it lived.

Your issue is covered by this objective. Thank you for your support for this objective and strategies.

Hold tribes accountable to provide accurate harvest numbers. Did see several references to "undocumented harvest" of mountain goats later and assume that is code for tribal harvest. Update plan with the real words undocumented tribal harvest.

This is a challenge however there are plenty of opportunities to work with interested tribes.

How do you propose to coordinate management plans with entities (tribes) who have little to no incentive to manage harvest. The licensed tag holders of this state pay for species management.

This concern is more relevant to either objective 11 or the conflict section. However, the response is that we do make changes annually to address permit changes based on
rule change before the 3 year period is up, is mismanagement and unacceptable. The annual elk calf
crut in Washington was estimated by 40-50% in one year, increasing elk damage in GMU 652 & 653 in
urban/agriculture farm communities without allowing enough antlerless harvest to reduce a
population increase every year to prevent it is unacceptable. Liberal hunting seasons in the Inaquah
and Psypullum GMU’s should be designed to reduce chronic elk damage concerns with more late
season antlerless permits. Not allowing a late archery season or antlerless harvest in a damage area
(EA: Area 603) is politically based and not justified. The buck/deer/bull/cow ratio in
urban/agriculture GMU’s should not be the same as ratio’s in GMU’s with Forest Service and Timber
company lands where large numbers of hunters have access for hunting. Requiring a hunter to use a
24 caliber minimum rifle or a muzzleloader with a muzzle exposed to the weather and no scope or
not allowing the use of a crossbow with a scope to shoot an animal during a damage hunt or season
is beyond common sense and stupid. A crossbow, .22 caliber center fire rifle and a muzzle loader
is beyond common sense and stupid. A crossbow, .22 caliber center fire rifle and a muzzle loader
with a muzzle primer exposed to the weather and scope can kill a deer or elk on a damage hunt just
as humanely as what is required now. WDFW needs to allow Either Sex) elk harvest with archery
and muzzleloader seasons and at least 50 antlerless permits for modern firearm permits in GMU 652
to help reduce the over population elk herd for at least three years to help the agriculture
community landowners. Not making any change in the 2014 seasons this fall is unjustified. This
same approach can be used for Objective # 12 and 2.

More needs to be done in the area of elk hunting at the Colockum. Tribal members have been
abusing the limits and access. We recognize the concerns about tribal harvest of older bulls in the Colockum herd while
state licensed hunters are mostly held to “true spikes”. However we are balancing the
total harvest which incorporates the fact that state licensed hunters take the majority of the
total harvest. Again your concern demonstrates the need for this objective.

No comment. Thank you for your participation.

NOT COUGAR

All species are important to coordinate between the state and tribes.

Of course, but, good luck. Accurate, truthful reporting as well as real prosecution of law- breakers
by tribal courts is the problem.

For a limit on what they can take

These are Federal treaties and can only be changed by Congress.

Reduce tribal hunting on deer and elk and increase tribal hunting of cougars and bears.

As described in the plan, treaty hunting rights are a part of federal treaties with
Washington tribes. WDFW has no authority to change the rights reserved by tribes in federal treaties.

see comment on objective 9. Co-management is ok, since wildlife moves on and off tribal land

Thank you for your support.

Stop any more agreements giving the tribes super citizenship. Do not give any more Gregorse type
illegal agreements with tribes. You or tribe or or tribal communities have given far too much access to wildlife
to the tribes with out litigation.

The state and tribes definitely should be working together in the management of deer and elk. The
state has no clue how many deer and elk the tribes harvest every year. This needs to change.

This is important and we are working to address a better understanding of the impacts of
harvest by tribal members on deer and elk management objectives.

Tribal tribes can hunt much game we non Indians can harvest and where? Meet a quota like
the salmon? Give me a break.

A quota like salmon would mean significantly reduced harvest by state licensed hunters
of deer and elk in many areas.

There needs to be some give and take on this one.

We agree.

This is a good idea.

Thank you for your support.

This should also include wolf/bear populations as well.

It does.

This is useless without tighter controls on harvest by the tribes and more active LE participation
when it involves unregulated or illegal harvest on ceded lands.

These agreements often address enforcement coordination as well as harvest issues.

This would be a desirable, a few tribes do a great job of living up to their co-manager, roles,
simply use it as it tool to bash the department, but never manage-only overharvest because they can
and fail to police their own members who even violate tribal rules.

We can all be criticized for these issues, but only by working together as described by
this objective and strategies can we adequately address harvest and enforcement of both
tribal and state regulations.

Tribal hunting has a much bigger impact on herds then the WDFW knows.

We are attempting to work with the tribes to share impacts based on harvest, survey, and
research information.

Tribal hunting is not controlled, they should be required to purchase a game license to hunt so we know were
tribal to look for those wasting game !!

These are Federal treaties and can only be changed by Congress.

Tribal only

Thank you for your comment.

WDFW should definitely STOP the tribes from slaughtering an entire herd. Beyond that, if some
liberal idiot allows it, there should be a notice to hunters not to waste their hard earned vacation time
and money hunting an area that has already been decimated by the tribes. This is another way to send
the message to hunters that there is something else to spend their time and money on rather than hunting.

They absolutely are included in the discussion. Most courts have determined that private lands are not part of a treaty reserved right.

Without complete tribal cooperation, this will be so skewed it will be worthless.... lots of time to end
guestimating harvest numbers of all animals.

You would help with the higher numbers of cougars.

Yes, there needs to be game management plans for all species. The black tail deer plan should be the
most important plan in place immediately since the numbers are decreasing and this move is way overdue. There should be a shortened season in place immediately for all user groups, seasons, until
the Black Tail management plan is in place and a game population study is complete.

This is addressed in the deer section of this plan.

Objective 11: Maintain hunter satisfaction and participation at or above 2014 levels for the life of this plan.

If there are an arithm of hunters engaging in this activity, then there should be no
reason/need/purpose to increasing/renewing their participation.

Hunters have been the backbone of wildlife conservation in this country for over a
century. Hunting is an important part of America’s as well as human culture, history,
and tradition. Without hunters many of the conservation actions taken to preserve and
protect wildlife would likely diminish. They remain an important part of management
of game species populations.

Your recommendations to extend the season would potentially result in even fewer deer
and elk, because harvest success would increase in many cases. Washington is the
smallest state in the west with the highest hunter densities. We cannot substantially
increase hunter success unless the deer and elk numbers also increase. So as weather,
habitat, and public tolerance cooperate, deer and elk numbers will increase. At that
point, we can look at improving harvest through season timing, special permit
opportunity, season length, or whatever the public favors.

WDFW RESPONSE

PUBLIC COMMENT

WDFW RESPONSE

(92 comments) Agree, Yes, Okay

Thank you for your support.

Address additional “fairness” issues between users through the Allocation Committee of the Game
Management Advisory Council and recommend changes supported by the Council. The GMAC has
become a lobbyist group and does not represent the hunting community as a whole. More weight
should be given to surveys and public meetings.

You are right that we need to keep using multiple ways of understanding what the public
thinks and we will continue to use all of the techniques you suggested, see objective’s
eight and two.

As a goal it’s good, but wildlife management should trump hunter satisfaction
Absolutely.

Be HONEST with the hunters, don’t keep taking things away and increasing prices. Increase
opportunities and wildlife numbers.

Thank you for your comment.
**Executive Summary**

- More opportunity, increased bag limits, increased antlerless hunting opportunities, new seasons, and increased doe/antlerless hunting opportunities.

- Managing wildlife and habitat, not hunters satisfaction.

- Maintain nature lover satisfaction and participation at or above 2014 levels for the life of this plan.

- I would like to see how this is done.

- I'm not informed enough to respond to this one.

- More opportunity, increased bag limits, increased antlerless hunting opportunities.

- More contact in management of the North and Western Walla Walla GMU. Also, the idea of any white-tail in those areas is a non-starter. The same is true in much of the North and Western Walla Walla GMU.

- I'm not seeing scientific/biological satisfaction and participation here. We understand this is game related, but frankly I'm not all that interested in hunter satisfaction and participation - particularly if there are no animals left for them to hunt.

- We did ask hunters about satisfaction in 2002, and will compare those levels to 2014. But this objective seek to improve even more.

- How about 2010 levels because hunter satisfaction just tanked because of the new timberland entry fees. Not hard to get much lower than it is now, so it is a pretty weak goal to use 2014 as a benchmark.

- The how is in the strategies. See previous responses about the importance of hunter satisfaction, but you are right that we will not achieve any of our mandate without healthy and sustainable wildlife populations. See the sections on game species.

- I would like to see more "Quality" Hunting opportunities. More specifically, offer more antlerless tags outside of the general season. There was a surplus of elk in the Columbia, but all additional antlerless tags were only offered during the general season. More opportunities outside the general season would increase the overall success for hunters, and help with more strategic management of wildlife (deer and elk) species.

- We can accomplish multiple objectives as described by our Legislative Mandate. See the executive summary.

- No. The effort and cost is too high, in both WDFW resources and in impact to the species.

- More opportunity, increased bag limits, increased antlerless hunting opportunities. LaHontan GMU has huge herds of does, and rarely do I see a buck running around. The same is true in much of the North and Western Walla Walla GMU. Also, the idea of any white-tail in those areas is a joke. I've been working in that area for the past three years. I have yet to see a white-tail, but I've seen tons of Mule-deer.

- We did ask hunters about satisfaction in 2002, and will compare those levels to 2014. But this objective seek to improve even more.

- More opportunity, increased bag limits, increased antlerless hunting opportunities. I.e. Kahlotus GMU has huge herds of does, and rarely do I see a buck running around. The same is true in much of the North and Western Walla Walla GMU. Also, the idea of any white-tail in those areas is a joke. I've been working in that area for the past three years. I have yet to see a white-tail, but I've seen tons of Mule-deer.

- I don't see this as a realistic objective without species management improvements made.

- See previous responses about the importance of hunter satisfaction, but you are right that we will not achieve any of our mandate without healthy and sustainable wildlife populations. See the sections on game species.

- We would like to see how this is done.

- You are right that increasing game species numbers will increase hunter success and satisfaction, but there are other things we can do to improve satisfaction as well.

- This is more of a hunting season suggestion, but we understand that making changes to hunting seasons that are supported by the public helps with satisfaction.

- If you increase the number of permits, hunters need a reason to pay for another license. How will this be accomplished?

- I don't believe there is much satisfaction at all. Read some of the threads on HUNT-WA. Outdoorsmen are pissed off at the way this states wildlife is so mismanged. The wildlife is managed for money/income not wildlife future.

- I'm not seeing scientific/biological satisfaction and participation here. We understand this is game related, but frankly I'm not all that interested in hunter satisfaction and participation - particularly if there are no animals left for them to hunt.

- I would like to see more "Quality" Hunting opportunities. More specifically, offer more antlerless tags outside of the general season. There was a surplus of elk in the Columbia, but all additional antlerless tags were only offered during the general season. More opportunities outside the general season would increase the overall success for hunters, and help with more strategic management of wildlife (deer and elk) species.

- It is getting pretty expensive and only the middle upper class will soon be hunting. With access fees from timber companies, DNR fees discovery pass, special permits, raffles, etc. This doesn't take into that fact that most guys fish. It is getting pretty crazy. Youth opportunity needs to be great to keep kids liking hunting. Kids are the future of the WDFW and there needs to be longer seasons for kids.

- More opportunity, increased bag limits, increased antlerless hunting opportunities. I.e. Kahlotus GMU has huge herds of does, and rarely do I see a buck running around. The same is true in much of the North and Western Walla Walla GMU. Also, the idea of any white-tail in those areas is a joke. I've been working in that area for the past three years. I have yet to see a white-tail, but I've seen tons of Mule-deer.

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- I don't see this as a realistic objective without species management improvements made.

- How will this be accomplished? This is the how in the strategies. See previous responses about the importance of hunter satisfaction, but you are right that we will not achieve any of our mandate without healthy and sustainable wildlife populations. See the sections on game species.

- I'm not seeing scientific/biological satisfaction and participation here. We understand this is game related, but frankly I'm not all that interested in hunter satisfaction and participation - particularly if there are no animals left for them to hunt.

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The best way to do this is to increase free public access and limit the barriers to entry to hunting, the main of which is the notion that it is overly expensive or hunters must travel long distances or pay for private access. Increase awareness of public hunting lands and continue to expand WDFW's purchase and lease of lands for hunting and wildlife management.

Thank you for your comment. We will continue to work with landowners to maintain public access, see the private lands access section.

The state must remember they work for the hunters. The hunters are the main taxpayers. Who fund the projects and need not to be treated like second class citizens.

We agree that hunters are important stakeholders and play an important role in wildlife conservation and management.

Then give hunters a good product - you are trying to sell licenses. Look at what the fisheries sad old. They launched "Fish Washington" and increased sales. Take the western Washington pheasant program for example...Sites should be increasing not decreasing and the department should not be restricting sections of sites for monitoring (Scatter Creek). The sites are already small and crowded.

Thank you for your comments, these are all good examples of what we need to achieve through the strategies in this plan.

This means manage for larger populations of animals, less doe tags, less cow tags, be real not mange for more money.

This will need to begin with WDFW showing hunters that their 'satisfaction' even matters. I believe, and have evidence to back it up, that the majority of hunters are very dissatisfied, currently, and feel that WDFW priorities need to change.

Through this planning process, we are asking hunters and other Washington citizens what are their priorities.

Washington State resident license fees are approaching NON resident levels. Our hunting opportunities are far from world class and resident fees should reflect this fact. You want more license sales, bring the resident fees down closer to other states resident fee schedules.

This is an important consideration and we are looking at ways to address this concern.

Wdfw needs to stop pissing off hunters by trying to ban night hunting for coyotes, banning coyote hunting with dogs, having ridiculous quotas on cougars. Also it is frustrating to hear of Wildlife officers citing fellow hunters for wantage of wildlife when shooting a coyote and leaving it lay....it is technically illegal according to state law, but most people are not aware of the law and even the regs and wildlife programs say it only applies to "game" animals; but yet there are wildlife officers out there enforcing that law. Hearing things like that makes hunters feel like wildlife is against them. This kind of thing will make hunters just hunt out of state where they feel wanted.

It is difficult to know if your example was hearsay or not, but we understand the need for good interactions between hunters and all agency staff as important to maintaining satisfaction.

We can only hope. To many "special interest groups & programs" will never allow WDFW to come to a point that the license buyers will be "satisfied"!

We would have more satisfaction and participation in many ways, if there was better access to the woods. With all the closed gates and restrictions, it is very hard for the handicap people to enjoy themselves.

Thank you for your comment.

What is hunter satisfaction? Why do hunters have so many rights and non hunting citizens have so few?

Hunter satisfaction is tied to continued license sales and funding for conservation. Non-hunters have the right to make their opinions known to the agency as well and we do appreciate those views as well.

We will only hope. To many "special interest groups & programs" will never allow WDFW to come to a point that the license buyers will be "satisfied"!

You won't if you continue to force so many rules, regulation and fees. I really don't want to hunt or fish.

We agree. As long as these plans consider development restrictions to protect big game and waterfowl, wintering areas, and use public hunting by permit as the method of choice to control overpopulation of wildlife.

We will continue to work with landowners to maintain public access, see the private lands access section. It is also important to recognize that Washington contains about 45 million acres; about half is public land (mostly US Forest Service); and about 4 million acres of what is classified as industrial timberlands. So far, we estimate that about one million acres are in fee access programs.

What's to satisfy?

Hunters have been the backbone of wildlife conservation in this country for over a century. Hunting is an important part of America's as well as human culture, history, and tradition. Without hunters many of the conservation actions taken to preserve and protect wildlife would likely diminish. They remain an important part of management of game species populations.

Yes. Decrease the cost, and the numbers should increase.

At least one of those plans should include public education on how to live with wildlife.

Thank you for your comment and support for this objective.

You won't if you continue to force so many rules, regulation and fees. I really don't want to hunt or fish.

We agree that regulations can be a barrier to participation and objective 7, strategy c will attempt to address your concern.

You will not happen

Hunters have been the backbone of wildlife conservation in this country for over a century. Hunting is an important part of America's as well as human culture, history, and tradition. Without hunters many of the conservation actions taken to preserve and protect wildlife would likely diminish. They remain an important part of management of game species populations.

Will not happen

With the shutting down of Hunting land (Weyerhauser) this will never happen!!

Thank you for your comment. We will continue to work with landowners to maintain public access, see the private lands access section.

Work on bringing private landowners back to the table for open public access. Give them incentives to do so or penalize them for closing. W. WA is now mostly pay-to-play and the common man has nowhere to hunt if he can't afford a permit.

We will continue to work with landowners to maintain public access, see the private lands access section. It is also important to recognize that Washington contains about 45 million acres; about half is public land (mostly US Forest Service); and about 4 million acres of what is classified as industrial timberlands. So far, we estimate that about one million acres are in fee access programs.

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Yes. Decrease the cost, and the numbers should increase.

At least one of those plans should include public education on how to live with wildlife.

Thank you for your comment and support for this objective.

We need to improve the hunting experience.

Thank you for your comment.

Public COMMENT

Allow for local F&W offices to manage local problems. "Free local level plans" sounds like more middle managing instead of enabling the local handling of problems.

The language also says or significant actions. In some cases the action may be just influencing a local ordinance so that hunting is still allowed.

(29 comments) Agree/absolutely/yes/support

Thank you for your support.

Agree, as long as these plans consider development restrictions to protect big game and waterfowl, wintering areas, and use public hunting by permit as the method of choice to control overpopulation of wildlife.

So noted, thank you for your comment and support.

At least one of those plans should include public education on how to live with wildlife.

Living with wildlife is an important outreach component identified in the conflict section of this plan.

Curtail development in areas where wildlife exist....

The Department has not authority for regulating development. That is a county government authority.

Developed conflict resolution plans should not center around lethal removal of predators, as many non-lethal, ethical alternatives exist. Recommend working with non-profit wildlife advocacy groups to assist in conflict resolution.

Absolutely and we are looking for partners. Please see our wildlife conflict section.

Disagree

Thank you for your comment and support.

Don't forget roadkill deer areas. Delphi Road at Dempsey Creek Thurston County for instance!

Thank you for your comment and support.

Education citizens on responsibilities to avoid conflicts

Living with wildlife is an important outreach component identified in the conflict section of this plan.

Emphasize co-existence issues. In the long run co-existence is considerably cheaper and more effective. See Proctor Cow's work in California.

Living with wildlife is an important outreach component identified in the conflict section of this plan.

First of all, I have no sympathy for damage from deer and elk. This can in most cases be rectified by allowing hunting. When the focus changes to predator-human conflict, one only has to protect himself in a rational manner. Most of us have done it our whole hunting lives....and avoided killing an animal because of it. Wolves will be treated like any other predator....until there is management that includes hunting, no one I can think of is going to kill a wolf unless its unavoidable.

Thank you for your comment and support.

Five? Sometimes less is better, keep it simple

Thank you for your comment.

General comments about wildlife conflict management.

There were many comments for this objective that were better suited for the wildlife conflict section and were answered there.

Get rid of some humans.

Thank you for your comment.
Humans are causing most of the problems when they move into traditional areas of wildlife. The rest of us should not have to pay for three lack of knowledge and forethought before moving into areas of wildlife habitat. Thank you for your comment.

Hunting, Hunting and Hunting of problem animals especially wolves. If a wolf or a pack causes a problem take them out immediately. No long process of meetings and hand ringing. Thank you for your comment.

I could tell you one for sure in Wenatchee Valley coordinate deer hunts with local orchards to thin local deer population. But killing 10-15 a week from hunters creates a lot of issues. Thank you for your support, this is a good example of the need.

I do not agree with giving the land owner permits. That is what the Master Hunter Program is partly about. Both are important tools to address conflict, please see the conflict section of this plan. Thanks for your feedback.

Increase involvement of volunteer programs to reduce and eliminate livestock- predator interaction (e.g. predation). If you need someone to show how to do this I will be happy to set up a program for you. We are currently using volunteers and agree with you, they help a lot.

Instead of studying every subject of death, do something useful with the money, decrease the dead weight in the Olympia office and get people out in the field actually making a difference. Thank you for your comment. By far most of the staff supported through the Game Division are stationed in the field.

Kill large predators. This may not be necessary, please see our wildlife conflict section.

Killing the predators should be a last resort. Please see our wildlife conflict section.

Let us focus on raising awareness and practicing tolerance. I would like to see Fish and Wildlife devote more effort to promoting the understanding of wildlife needs. Russel Link's books, Living with Wildlife and Landscaping for Wildlife are very good. Maybe these books could be updated and used in classrooms, seminars, and workshops. Add information about bear, cougar, and wolf habitat and habits. Since these books were published, our human population has vastly increased and spread into much of the state where wildlife could be relatively undisturbed.

Local level plans generally work better than a state-wide plan. Thank you for your comment and support.

More important to deal with Hoof Disease in SW Washington! Thank you for your comment.

No. Find out what the top 5 are and then come up with a manageable plan for the top 1 or 2 at the most. Saying you'll do five is bogwash and you'll spend hundreds of thousands on papers and reports and resource to blow smoke and put yourselves on the back and say what a good job you've done. Aim small miss small. Narrow your focus to what is realistic. Five isn't realistic.

Now this makes sense. Put more effort into public education about NON LETHAL human wildlife conflict and help the public understand why our wildlife and ecosystems are so valuable. We agree, please see our wildlife conflict section.

Only 5! Simple, if a land owner will not allow open access to hunting on their land then they should NOT be given any financial compensation. At least 5!

The live-stock should be abandoned from our public land this on itself is a conflict between wildlife and human scum Thank you for your comment.

The majority of problems and due to humans - such as leaving out pet food, garbage, or outright feeding wildlife. Increase penalties against human-caused problems. Thank you for your comment, the Legislature recently passed laws that will allow WDFW officers to give a warning followed by a citation if the feeding situation is not cleaned up.

There are already plans in use that work well, they should be adapted to other areas of the state, too. Thank you for your comment and support.

This is unrealistic and a waste of the tax payers money. Thank you for your comment.

This plan should include a public debate and comment period before implementation. Thank you for your comment.

This should be all focusing on Education of the people to peacefully co-exist and not on hunting. We agree, please see our wildlife conflict section.

This should be done especially in the case of wolves. Thank you for your comment.

This sounds like a great goal. We might look to the Blackfoot Challenge project as an inspiring mentor in this process. See: http://blackfootchallenge.org/Articles/ This sounds like a great goal. We might look to the Blackfoot Challenge project as an inspiring mentor in this process. Please see our wildlife conflict section.

This plan should include a public debate and comment period before implementation. Thank you for your comment.

Treating those who revere nature with all the respect and deference you show hunters. Why do they get preference? If it's only a revenue-based thing, figure out why. Why do cows get preference? Really look at what motivates your whole agency and ask yourselves why. We can and do treat all of Washington’s citizens with respect and deference and seek to manage wildlife in a way that all can benefit.

Use depredation hunts with dogs for bears. Thank you for your comment.

P 28 What are the Dept plans to reach out to Hunters, NGOs, and the Legislature to create a more sustainable and stable funding source? The Dept looks to hunting as the solution to urban wildlife conflict when outreach and education is more likely effective. Year-round hunting seasons are suggested, and hunting a problem area months after a problem is unlikely to solve any problems, and certainly not likely to catch an offending individual, whether bear, cougar, wolf, coyote, deer, or elk. This suggestion is outside the scope of this plan, but is being discussed in many other sections.

When does 5 come from? Develop however many you need. We agree, that’s why we said “at least”.

Wildlife problems are caused by humans. Use public education based upon science. Humans move into wildlife habitat then complain about wildlife in their yard. Try to get them to evolve instead of fearing them. Fliers on plants to grow that deer don't like helps. Not fearing Cougars, but looking big and backing slowly away is good. Stuff like that. Cougars follow deer down to the rivers in summer. So a town or house is nearby. So what? We agree, please see our wildlife conflict section.

Yes and then make them public as well as notifying the public when these significant actions will take place and why and what they will be. Thank you for your comment.

YES by using non lethal methods? Coexistence is key here! Thank you for your comment and support.

You Focus on the human element of conflict and the behavioral changes necessary to avoid conflict in the first place. Bear-proof garbage containers should be required in areas where scavenging bears have been a problem, for instance. Science coming in from all corners pretty much shows that lethal management of conflicts rarely achieves the stated goals. Thank you for your comment.

Objective 13: Improve the department's rating on game management communication by 2021.

PUBLIC COMMENT

2021 really, no wonder stuff never gets done, to sense od urgency, I see. The department should have a public opinion survey every six years. We agree that we need to make immediate improvements and the only reason we used 2021 was because we measure this objective with public opinion surveys which we conduct every six years.

(15 comments) Improvement needs to be immediate/warm before 2021/etc We agree that we need to make immediate improvements and the only reason we used 2021 was because we measure this objective with public opinion surveys which we conduct every six years.

(23 comments) Sooner the better/agree/yes/okay We agree that we need to make immediate improvements and the only reason we used 2021 was because we measure this objective with public opinion surveys which we conduct every six years.
A lot of room for improvement.

We agree that we need to make immediate improvements and the only reason we used 2021 was because we measure this objective with public opinion surveys which we conduct every six years.

Ambiguous

Any rating will be determined first by quality of strategic planning and implementation by the agency. Actions communicate more strongly, usually, than words. I am a retired PR professional. Game management communication will be driven by agency actions, as to how well it listens and responds. Two-way communication even in our current high tech times is necessary. Difficult to do as a public agency when the legislative and judicial arms of government, and especially the authorizing and appropriating functions of the legislature, can produce shipwrecks for an agency.

BE HONEST, TELL THE TRUTH, DON'T ALIGN WDFW WITH ANTI-HUNTING ORGANIZATIONS. ACT LIKE YOU ACTUALLY CARE ABOUT THE SPORTSMEN IN THIS STATE!

Wildlife belong to all of Washington's citizens, but as stated in the executive summary hunter will continue to play a key role in wildlife management as directed by our mandate.

Be more open and make finding game management easier.

Thank you for your support.

By increasing their education about how to live with Wildlife

Thank you for your support.

Clean up your web site so it's not so busy.

Thank you for your comment, we are continually looking to improve how information is provided.

Disagree

The residents of an individual county and their perspectives are important, but wildlife belong to all citizens of the state. So we seek everyone's comments and ideas. We cannot afford to hold meetings in every county, so we provide multiple ways for citizens to submit their comments.

Give each county a major say in what decisions are made in there own county. You hold meeting only in metro areas.

Thank you for your comment.

'Good luck on that one. I've hunted this state since 1976 and your rating in my eyes has declined every year.'

Thank you for your comment.

Good luck with that, as long as WDFW consistently ignores the non-consumptive population, and continues to assert that somehow WDFW owns the wildlife.

Thank you for your comment.

Having meetings with affected people and landowners at a time and place locally would be helpful.

We agree that we need to make immediate improvements and the only reason we used 2021 was because we measure this objective with public opinion surveys which we conduct every six years.

Hell yes but as long as you load meetings with anti hunters, wolf lovers you will never make it. Just as this survey has been spoke of for months then we could not start it till today. And yes it was hard to find. Did you give all the anti a special key access to get early?

Thank you for your support.

How is this rating established?

From public opinion surveys.

I doubt this objective is possible to reach.

Thank you for your comment.

I think the real problem is not communication but rather taking positive action to solve problems as this is the real area of poor ratings.

Thank you for your comment.

Improve communications: 'OK --> improve the ratings? Who cares!' This issue was very important to many citizens who commented on this objective.

Thank you for your support.

Improve the department's rating on wildlife conservation and public outreach education by 2021.

Thank you for your support.

It certainly would help if the Department was active on social networks. A designated person to interact with the public and answer questions would be great start. Utah has this and the people seem to respond to the opportunity.

We do have a face book page that is staffed and we try to provide pertinent information. However, in recent surveys, this was not a high priority for respondents in getting information from the Department.

Listen to the people :)?

Thank you for your comment.

no

Thank you for your comment, but if you read through the responses to public comment on this issue, you will see how important it is to many.

Not at the expense of taxpayer and hunter dollars.

Thank you for your comment.

not likely

Thank you for your comment.

Once again, wishful thinking.

Thank you for your comment.

Please indicate how much of an improvement - right now I don't feel as through there is much in the way of transparency in the game division, especially as it relates to endangered species and the current management plans.

Thank you for your comment, hopefully you expressed your concerns for endangered species in the appropriate sections.

Press releases in rural newspapers would be helpful.

Thank you for your support, newspapers are one of the important ways for the Department to get its messages out to the public.

Take the ear plugs out of WDFW's ears and make them actually listen to what we want, not what they want.

Thank you for your comment.

The WDFW is the best agency at communicating of any public agency I've worked with.

This is a legitimate priority. Your first priority is to keep populations at a healthy rate and in keeping communications with the individuals involved in hunting you will become successful if you keep the lines of communication open.

Thank you for your support.

This is a legitimate priority. Your first priority is to keep populations at a healthy rate and in keeping communications with the individuals involved in hunting you will become successful if you keep the lines of communication open.

Thank you for your support and comment, we agree.

This need to be a number one priority each year, Not a six year plan. This is the real area of poor ratings.

We agree that we need to make immediate improvements and the only reason we used 2021 was because we measure this objective with public opinion surveys which we conduct every six years.

Objective 14: Maintain a strong team of thirteen private lands biologists statewide to assist landowners with habitat enhancements and provide recreational access. Utilize Farm Bill and state fund sources to enhance habitat under a minimum of 400 landowner agreements by 2021. Submit at least one proposal for permanent additional funding for habitat and access incentives.

PUBLIC COMMENT

as long as it allows for even the little guy, not just the rich folk to hunt. this bit of having to pay for license from the state, then pay another fee to park, and another to access land to hunt is for the birds!

Strategies under Objective 16 are ways that we will use to attempt to minimize the cost of hunting access for hunters.

Focus should be on recreational access, not habitat enhancements. In areas with lots of private land, enhancing wildlife habitat on private land has little or no public benefit if there is no place for recreational hunters to go hunt.

The private lands program also works with private landowners to improve hunter access and other objectives in the plan address this aspect.

If farmers are to receive incentives for allowing access to lands, then there must be a requirement that they actually allow access to people who are not extended family or other farmers. Let's fix this.

Many of our access agreements are with landowners in the CRP programs. The federal CRP requirements are beyond the scope of this plan. Riparian restoration or enhancements are high priorities.

Large corporate land owners are now turning this state into Texas style private hunting. Irritating since our license dollars support the animals that are now inaccessible to us that pay for them.

This is a key concern to the topic of public access. Objective 19 is included to attempt to address this issue.

Make sure that the land owners that you sign up actually let people other than relatives and friends get access. Doing精准扶贫 to help land owners that only want a private hunting reserve that the state pays for and keeps people out of.

WDFW only offers access incentive payments where the landowner does not directly control who has permission to hunt on the property.

Might want to include timber companies as well. They are now charging for access for hunting.

Our biologists do already work with timber companies and the expanded incentives referenced in the objective would be helpful in this arena as well.
No help unless state licensed hunters are allowed free access on industrial size (500 acre plus) properties either timber or ranch. No damage permits for game unless the private land being damaged is open for free to state licensed hunters during the state seasons for that animal. The WDFW keywords to timberland and other businesses and only offers carrots, and more carrots. How about getting something in return for licensed hunters. If appropriate, all landowners we assist with habitat improvements are encouraged to participate in our access programs. Making this a requirement though may reduce the amount of quality habitat available and limit wildlife populations. While WDFW requires hunting access as part of Damage Prevention Agreement or issuance of damage permits the plan contains strategies to review and adapt current hunting access requirements where WDFW is providing assistance with wildlife damage.

The focus of this group should be to find ways to get landowners that charge fees to improve habitat with part of the fees that they charge. WDFW will never be able to provide enough money to offset the revenue that landowners get from fee programs, but maybe they can improve wildlife habitat on those lands. We are aware that some landowners do this or have considered it but not all. We agree that this concept should be included in our discussions with timber companies in particular.

There are large tracts of land that have been closed to public access by private land owners. My concern is that this is being done to gain favorable incentives from the state by the state or the land owners. The Paradise area between Brewster and south summit red in Okanogan county is a perfect example. This several years ago was state land but the state made a land trade with the current owners and this area has been closed to public access since. It is now the private hunting grounds for the land owner and their clients/friends. Next well see it in some sort of game ranching program with the state. How do we allow thousands of acres of prime public mule deer habitat to be resided in a land swap and then closed to public access.

This kind of situation has occurred in other parts of the state as well. One of the plan strategies involves monitoring public land exchanges to try to make sure that recreational access is considered before the transaction occurs.

(27 comments) yes or agree

(3 comments) I agree with this objective.

(2 comments) No

Acknowledged. Thank you for your comment

Agree as some form

Thank you for your support

Agree, we need more public hunting land and protected habitat

Thank you for your support

Any effort in habitat enhancement on private lands need to include a public access agreement

Many of the landowners we assist with habitat participate in our access programs. Improved habitat can increase overall game populations and in some cases in directed at listed species as part of recovery programs.

Biologist to assist land owners who do not charge access or trespass fees. I don't want my money going to assist land owners who are profiting on land access.

We tend to agree when the enhancement is for game species. In some instances where the habitat enhancement is for listed species recovery it still may be appropriate for WDFW to assist landowners. concentrate on large land owners not see how many small private farms u can subsidise

The type and size of landowners we attempt to work with varies across the state depending on the hunted species and local priorities. For example: In western Washington much of our emphasis has been directed to toward working with timber companies. Disagree we do not need more biologists.

This objective would not increase staff from existing levels. Current staff that provide direct services to landowners and hunters would be retained.

Essential.

Thank you for your support.

I get rid of the animals rights people that are in the game dept.

Thank you for your comment.

I have never made a comment before. I am very concerned about wildlife and their rights.

Thank you for your support.

Good idea

Thank you for your support.

Good objective. Not sure where 13 came from but it doesn't seem to be enough. You need at least 4 extra to account into the position and step up when others leave. You also need them to assist the 13 when they are swapped.

We also employ technicians who assist the biologists. Great but you must do a better job of letting the hunting public know about these opportunities

The availability of access information has improved over the last two years and Objective 19 is included to address continued improvement.

How about providing some guidance to the Fed's to create some habitat on their lands so that the private companies don't have to carry the burden.

WDFW does work with the USFWS and other federal landowners to provide advice and encourage habitat enhancement.

I love it!! Private land is so untapped and many private landowners are amenable to access by responsible naturalists and hunters.

Thank you for your support.

I support your intent to have private lands, biologists and work with landowners -- forget the widgets

Landowners have the right to control public access on their property and participation in our access programs is on a voluntary basis.

Less recreational use is what our wildlife needs. LESS. Stop encroaching on their land and destroying their habitat and you will see the HWC scenario reduced.

Thank you for your perspective.

Looks like someone trying to keep the cush job to me.

Thank you for your perspective.

More clarity needed on the enhancement of habitat please.

Our biologists assist landowners with a wide variety of enhancements too diverse to enumerate in this plan. This ranges from riparian and wetland restoration to improvement of grassland or shrub steppe habitat and forest management prescriptions.

No comment

Acknowledged.

Not enough information to comment. Would need more?????????

Our biologists assist landowners with a wide variety of enhancements too diverse to enumerate in this plan. This ranges from riparian and wetland restoration to improvement of grassland or shrub steppe habitat and forest management prescriptions.

OK

Thank you for your support.

OK - should be voluntary

Landowners have the right to control public access on their property and participation in our access programs is on a voluntary basis.

or more

The participation figure in the objective is a minimum and we would strive to exceed that.

Private landowners should fund this as they benefit from it

In many cases there is not a direct benefit to the landowner in terms of cash. Our involvement is directed at habitat improvements that provide public benefits and can open the door to public access.

strongly support

Thank you for your support.

Support

Thank you for your support.

sure

Thank you for your support.

the who has control you or the farmer

Landowners have the right to control public access on their property and participation in our access programs is on a voluntary basis.

This might help with difficulties in our more rural areas, where some private landowners could utilize their landholdings to benefit and complement their farming and ranching operations.

Thank you for your comment. This is the intent of the objective and much of the work in our private lands program.

This sounds really good!

Thank you for your support.

unknown

Thank you for your comment.

Very important

Thank you for your support.

we need better use of state and federal lands and less money for buying private lands.

We also work with public landowners. This objective focuses on cooperative agreements with private landowners and would not result in the acquisition of property.

What good will it do to help farmers and other land owners with their habitat when they won't even allow most people to hunt without paying some ridiculous fee

Many of the landowners we assist with habitat participate in our access programs. Improved habitat can increase overall game populations and in some cases in directed at listed species as part of recovery programs.

Who will pay for the biologists?

The private lands staff is funded primarily from a combination of hunting license revenue and federal Pittman Robertson funding derived from the sale of firearms and ammunition.
Why not send your people to Wyoming and Utah which do a much better job of managing and they can learn from those State's plans and activities. WDFW participates in multi-state meetings and often looks to other states for ideas.

Yes an apprise the public of who the thirteen individuals are and exactly what they will be doing and offer the public a way to contact them. Any of our field staff can be contacted through regional offices but we have added a strategy to the plan to make this information available on the agency website for easier access.

Yes! Without habitat we got nothing! Thank you for your support.

You can do better. The participation figure in the objective is a minimum and we would strive to exceed that.

Yes, but the government needs to limit the timber corporations usage of herbicides and have better timber management programs that provide Big Game healthy habitat. WDFW should be working with the timber companies of the state Parks to utilize hunting land that is available and they are not. WDFW is participating in studies intended to address the effects of forest herbicide use on wildlife but cannot regulate their use. The outcome of the studies could result in improved practices. Allowing hunting in state parks would require a legislative change that many would not likely support. The overall state park acreage where hunting might be appropriate, in light of other uses, would likely be limited.

Yes, good idea. Thank you for your support.

yes but only if you can keep the program honest. We will strive to make sure that all hunters and landowners are treated equally.

yes yes yes this is imperative! Thank you for your support.

Objective 15: Emulate the good work done in Region 6. Master Hunters have been extremely effective tools in addressing wildlife conflict situations in this region. Region 6 conflict management has been using MH as tools in developing a close working relationship between the Department and local farmers. MH volunteer time to improve landowner's relationship between the Department and local farmers. By 2017, improve information available to hunters to help them locate areas where damage by game animals is occurring.

PUBLIC COMMENT

Again, no damage permits unless the land is open for free to state hunters. It is obscene that Hancock has a spring bear damage hunt especially designed to benefit them, and then they charge the hunters to come get the damaging bears, and they charge them to hunt bears in the fall too. WDFW actively employs many tools, both non-lethal and lethal, to address wildlife damage. As with most programs there are ways to improve and opportunities to re-evaluate the effectiveness of different tools. While WDFW requires hunting access as part of Damage Prevention Agreement or issuance of damage permits the plan contains strategies to review and adapt current hunting access requirements where WDFW is providing assistance with wildlife damage.

DO NOT allow landowners the option of "selling" damage tags. Require or implement special hunts and also allow access on that property that would allow access for the general public or youth or disabled hunters. WDFW staff could host and supervise those hunts during those times. Landowners are allowed to sell access in most areas; however, they are not authorized to sell damage tags or permits. Currently WDFW requires landowners to allow hunting access as part of Damage Prevention Agreement or issuance of damage permits.

Emphasize non-lethal methods for wildlife conflicts. Too many permits are issued to kill bears and other wildlife simply by an unsubstantiated complaint. The burden of proof should be on the person with the complaint (non WDFW). When possible WDFW always will use non-lethal methods as the preferred option and does require that damage be verified prior to issuing permits.

I am not in favor of this. It is giving an unfair advantage to hunters. Work with the wildlife biologists to find other ways of dealing with problem game animals rather than just handing GPS coordinates or busing in hunters to deal with the issues. Sound reasoning and science should guide wildlife damage by game animals, not jumping to killing. Non-lethal methods to mitigate wildlife conflicts are always WDFW’s preferred choice when it is feasible and these methods are often used in concert with hunting.

If a private landowner charges for access they should not get tax breaks or any public funds for wildlife damages The issue of property tax is beyond the scope of the Game Management Plan. WDFW will consider how addressing damage might be used to encourage landowners to allow access.

It should be the landowner’s sole discretion as to who may hunt there property. All others need to respect that. WDFW has programs that allow for this type of access management.

Landowners who close their lands to public hunting should not be compensated, affirmed “landowner tags” to use themselves or transfer to others, or be otherwise compensated to be accommodated in any way. In most cases landowners are required to allow hunting access at a level that will affect the damage that is occurring. WDFW will continue to assess current requirements and how wildlife conflict assistance can help to leverage hunting access.

Region 6 conflict management has been using MH as tools in developing a close working relationship between the Department and local farmers. MH volunteer time to improve landowner's property and gain access to game that destroys fences, pastures, and water ways. Continue to emulate the good work done in Region 6. Master Hunters have been extremely effective tools in addressing wildlife conflict situations in this region. Thank you. Programs like this would not necessarily change but additional hunting opportunity and may be provided by getting information about damage areas to other hunters.

Stop issuing special hunt permits (spring bear) to private timber companies, this increases the timber companies revenue in two ways. The reduction in damage to the timber (lets be honest with the success % and the number of permits issued what is the actual benefit) and the financial gain for the land to issue permits that the companies are charging. The timberlands are in effect double dipping. If they have a problem then let people help. Also this doesn’t mean issue special permits to contract animal specialist because that is stealing from the public. The animals belong to the state populace not to the landowner. WDFW actively employs many tools, both non-lethal and lethal, to address wildlife damage. As with most programs there are ways to improve and opportunities to re-evaluate the effectiveness of different tools. The use of special permits and creation of different hunting seasons are a few items that WDFW will review with respect to game animal population management especially in conjunction with conflict damage management.

Work with biologist to ensure that damage is actually being caused by a predator species. Use all means to ensure that only the problem individual is taken. WDFW actively investigates depredations and has strategies in place to help assure that control activities target individual problem animals.

you and to use hunters that has a hunting license for that year and not just the master hunt and put the master hunter back to what it was start for. The objective is intended to increase access for the general hunting population whenever possible.

G27 comments: Yes or Agree

Thank you for your support. Acknowledged. Thank you for your comment.

A lot to do—but seems wise. Thank you for your support.

Again, emphasize co-existence management measures. Make sure the plans are based on science. All for it— it will help. Thank you for your support.

And arrest and prosecute the people that vandalize. This is done whenever possible.

Define EK damage. No need to specify this as the public is more aware of what is going on. Thank you for your comment. Utilizing hunters to address is a primary strategy for WDFW when managing wildlife conflict.

Do the same for people who want to walk, hike, or ride horses without risking getting shot. Thank you for your comment. Public safety is always a concern.

Drive-by shootings always solve problems, don't they? Thank you for your comment.

Each county need more input with weight to back up their thoughts. WDFW encourages input from citizens and other governmental entities.

Fine people for causing conflicts by feeding wildlife. Hunt trapping and hound hunting. Hound hunting should only be used by the department to catch a particular predator. Wildlife conflicts are human caused. Educate them and make them use flaggery. Damage by ‘game’ animals is a direct result of too few predators. Don't send hunters to people homes. You will have conflicts then. Hound hunting is only allowed for rabbits and raccoons except in response to specific wildlife depredation situations. In these circumstances procedures are used to target individual problem animals.

Get rid of the Master Hunter program, it has been one problem after another every since the AHE was started. Thank you for your comment.

Good idea. Thank you for your support.

Good words. But history shows that WDFW doesn't do well with this proposal. Thank you for your comment and our intent is to improve services and opportunity provided to both hunters and landowners.

Great example... wolves. They destroy wildlife populations and then move on to domestic animals. Thank you for your perspective. The intent of this objective is to maximize opportunities for hunters in areas where additional hunting pressure will assist in minimizing damage caused by game animals.

201
Great idea, good luck getting that done. Now Bubba farmers friends can come hunt on his land with special permissions. Bubba won't invite anyone else...Increase fees and penalties for private landowners feeding wildlife to attract then to his land.

Hunting should not be considered an option for predator conflict resolution, as multiple non-lethal and ethical alternatives. Recommend instead a working relationship with non-profit wildlife advocacy groups to assist with non-lethal predator deterrent methods.

I believe we already know where these areas are. Some hunters may be too frequent careless requests in this regard from hunters.

I have concerns where these damage hunts are taking us. Wildlife is a public resource and agriculture is a private business. Animal damage is cost of doing business.

If just say that no regional biologist should be agenda driven, which is obviously assumed currently. They should be wholly responsible for their regions and be held accountable.

WDFW is actively involved in employing non-lethal conflict prevention measures where feasible. These measures are often deployed by the landowner in cooperation with WDFW or other collaborators (i.e. non-profit groups).

The idea behind the objective is getting information to hunters who do have these permits. Levels of antlerless permits are adjusted on an annual basis to address needs.

The use of USDA 'hunters,' shooting elk at night, was a very bad decision. It put a very dark black eye upon WDFW and it will be very hard to overcome the distrust that this move has placed on the WDFW! Utilize the Hunter Education Instructor cadre to assist Master Hunters in managing game animal populations. In some situations, landowners are causing the damage.

Take HUNTERS OUT OF THE EQUATION. Now? They do not speak for me or my land or my needs. They are killers who are creating more problems within my ecosystems.

That's fine - but again, boot hunts for bears are ineffective.

WDFW respects the right of private landowners to control access to their property. This objective is intended to connect hunters with landowners who want or need hunters to help address damage.

Sooner 2014

This can be done by local people who hunt the area. We can utilize the help that is there. Agree and the strategies in the plan would help those hunters connect with landowners who want or need additional hunting on their property.

This is ok but we need to continue to have depredation hunts for bears who damage forest plantations.

This does not include predators. District wildlife biologists and game management wardens should be the only ones allowed to relocate or otherwise deal with predatory animals.

This is an example of where working with a landowner to improve access helped with teaching a game population objective. The measures could be in place sooner. Some time may be needed though to find a mechanism that is accepted by landowners.

This simply is an obvious solution to a thorny issue.

This sounds good but let all hunters know not just master hunters.

To all hunters and not just incentive hunters for A.H.E. hunters.

Use the Master Hunter program in these cases.

Using hunters, instead of US Dept of Agriculture snipers, to harvest problem animals would be an improvement. The use of USDA 'hunters,' shooting elk at night, was a very bad decision. It put a very dark black eye upon WDFW and it will be very hard to overcome the distrust that this move has placed on the WDFW!

Utilize the Hunter Education Instructor cadre to assist Master Hunters in managing game animal damage to farms. This would incentivize hunters to both programs, which would in turn work to selling the idea that WA is a great place to hunt to past and new hunters.

These two groups are already used to assist us with conflict situations but increasing the general hunting populations ability to hunt in these areas represents a further improvement.

Very important.

Why wait until 2017? I get fish and game updates via email all the time.

Wildlife conflict situations should not be solved by elimination of wildlife outside of the hunting season. Where possible non-lethal measures are employed to abate wildlife conflict situations. However, often these events will occur outside of the general hunting seasons and require immediate attention to resolve the conflict issue. Prior to taking lethal action WDFW considers the impact of removing individuals from a population due to conflict events.

Yes and send them to areas that are difficult to get to by other predators.

Yes, and WDFW needs to go to bat for wildlife and pay for some of the damages that wildlife is doing to their property.

Yes, and WDFW does have programs that compensate landowners for verified losses in specific situations.

Yes, no reimbursement without cooperation, where reasonable, for the landowner.
Access to public lands is becoming more critical as access to private land noted above becomes more difficult. There are 5.9 million acres of state managed lands in Washington. To my knowledge, most of these lands provide a reasonable level of access, except parcels landlocked inside larger private land holdings, consisting mainly of 640-acre school sections. Issues affecting access to state lands should mostly be resolved by a walk down the hall in the Natural Resources Building and generate discussions in regard to how these landlocked parcels can become accessible by the public. The National Forests within the state contain 7.9 million acres. These are public lands that access has been greatly impaired over the past 20 years and will become progressively at risk unless the National Forests are adequately funded by Congress or a more aggressive timber harvest program is implemented to help fund management of the forest's access infrastructure consisting of both roads and trails. The Northwest's National Forest managed under the Northwest Forest Plan are morphing into a forest preserve in lieu of forests managed for a multitude of public resources including recreational access, game for hunting and a source of fiber for the forest products industry; all of which are objectives under the NWFP. These three resource objectives are taking a back seat in the outcomes resulting from the management priorities focused on the past two decades. This is occurring because the primary interests that have been active and "at the table" in guiding and promoting the forest's management priorities have been from the preservation ase (anti-logging) groups. If the WDFW is concerned about the risk in the loss of access to public lands and game populations for hunting, it has to be proactive in helping guide the forest management prescriptions to achieve these objectives. The expansion of federal lands in the State of Washington should make this issue a priority for the WDFW. Ways WDFW can help improve access and hunting opportunities on National Forest lands: 1. Participate in the public decision making process for Forest Service projects that can improve access and hunting opportunities. The Dept's expertise in wildlife management, particularly in improving game species would most likely be a valuable asset to the Forest Service's decision making process. 2. Encourage hunting groups the Department works with to also participate in the Forest Service Project public decision making process promoting actions that are favorable to improving access and hunting opportunities. 3. Encourage County Commissions/Councils to participate in the Forest Service projects decision-making process to promote actions that improve public access on Federal lands and generate revenues for the counties and local economies. For the twenty-five counties that have Forest Service lands within their jurisdictional boundaries, this should be a priority. Again if they won't allow hunting on their lands then they should not be given any compensation for the damage that is occurring. WDFW cannot force any landowner to allow hunting access. Closing areas to hunting where landowners are charging fees would impact hunters who are willing to purchase permits and further exacerbate crowding in other areas that would be open.

Presently some of the very large land owners, such as the timber companies, are controlling the hunting of a public resource and thus are in essence managing the resource. This should be done by professionals in the Department not by land owners. The land owners acting like the resource are theirs not the states. In addition, some land owners are making a type of "private" hunting club out of their property not for the sake of managing the resource but for the dollars they make from hunting. Special regulations as to how very large land owners regulate hunting on their property should be considered to provide opportunities to all hunters not just the wealthy. The program is designed to assist landowners who want help managing public access on their property. WDFW does respect the right of landowners to control public access on their property. Our strategies intend to provide services or incentives for them to do so without directly charging the public or to encourage them to keep fees low. These concepts are included in the strategies under this objective.

We will work with other public landowners in the evaluation. WDFW does take part in federal land management planning including where access is involved and encourages other public land managers as well. Issues related to landlocked public land are addressed under Objective 17.

We will try to work with all landowners including timber companies.

We agree that public behavior is part of the issue relating to landowner decisions. There currently is not a tax incentive for allowing public access which would be beyond the scope of the Game Management Plan. We will attempt to work with all landowners including timber companies.

We will work with other public landowners in the evaluation. WDFW does take part in federal land management planning including where access is involved and encourages other public land managers as well. Issues related to landlocked public land are addressed under Objective 17.

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And when landowners make a claim for damage done by predators and stock killed a stringent and thorough investigation should be done and documented for the public to observe. Depredation events are investigated by trained WDFW staff. In most instances, WDFW Law Enforcement leads the bear and coyote depredation investigations while WDFW Wildlife Program biologists lead wolf depredation investigations. The manual used by WDFW staff to investigate depredation events is available on the WDFW web page.

bear

Discontinue the practice of giving land owners “kill permits”, if there is damage due to wildlife; sell harvest permits that are valid only on that particular property. This could be accomplished through a special permit drawing. There should be no access fees allowed. Damage Prevention Permits are the preferred option to mitigate damage issues if non-lethal measures aren’t effective. In conjunction with these permits, in 2014 WDFW introduced the Damage Tag; which hunters can obtain for a nominal fee once they have the opportunity to utilize a Damage Prevention Permit from an individual landowner.

For landowners who charge for access to waive the fee for hunters performing damage control service. Thank you for your comment.

For landowners that provide access with a special permit drawing that land should be sold at the same price as the actual acres is arbitrary. You should recognize that many landowners allow hunting now and do not need to be in a “program” – on the other hand, some landowners in your program (hunting by written permission only) do not allow public hunting and never give permission to anyone outside their families and hopefully you are not paying them for this.

Good objective – actual acres is arbitrary. You should recognize that many landowners allow hunting now and do not need to be in a “program” – on the other hand, some landowners in your program (hunting by written permission only) do not allow public hunting and never give permission to anyone outside their families and hopefully you are not paying them for this.

Great idea, good luck getting that done. Now Bubba farmers friends can come hunt on his land with special permissions. Bubba won’t invite anyone else...increase fees and penalties for private landowners feeling Wildlife to attract then to their land. We do recognize that many landowners allow access without WDFW involvement. Landowners in our Hunt by Written Permission program do not receive access incentive payments. We do monitor permissions given and have dropped properties from the program where it was apparent that it was being abused.

Great idea, thank you for your support.

Have an incentive program for landowners to manage their land for ecotourism. This is a valid idea but beyond the scope of the Game Management Plan.

I don’t see the necessity for this. Thank you for your perspective.

I really like the new register to hunt program and would like to see that continue and expanded if possible. The program is intended to continue and improvements are described under Objective 18.

I support the Department’s initiative to develop incentives to increase acreage in landowner participation in WDFW access programs. However, due to the implementation of hunter access fees, property owner liability concerns and other issue associated with open public access this may be increasingly more difficult to achieve. Individual landowner choices and analysis of the risks and problems associated with public access will drive the success of this objective. This leads me to Objective 17.

May not be too eager to accommodate private land owners at an expense to allow hunting if they are experiencing damage. Should be considered a service if there is damage. WDFW does not intend to provide cash incentives to obtain hunting access to address damage. In many cases landowners we assist with damage are required to provide hunting access.

If a landowner has problems with wildlife he should allow hunting on his land. That doesn’t mean leasing to the highest bidder it means allowing the public access. If they wont allow public access to the land they then should not get any type of compensation for damage to their property.

Let the cougars and wolves take care of access. Try to get landowners to stop wiping it all out the habit. In most cases, some level of hunting access is required for landowners to receive assistance with damage from WDFW.

The cougars and wolves take care of access. Try to get landowners to stop wiping it all out the habit. WDFW does work with landowners to protect or improve habitat.

You like the sound of this still who and how. WDFW does often look to other states for ideas but also recognizes that landowner views and concern are sometimes different here.

The program is implemented by WDFW’s Private Lands Biologists in each region.

Thank you for your perspective.

Thank you for your perspective. Thank you for your perspective.

Thank you for your support. WDFW’s Landowner Hunting Permit Program does this in unique situations.

Provide landowner incentives (tax breaks, tags, seasons) for allowing free public access Changes to tax laws are beyond the scope of the Game Management Plan but WDFW would provide comments on any proposed law change that might affect recreational access.

OK. Thank you for your support.

Provide incentives to landowners by extended seasons, limits, etc for participation WDFW’s Landowner Hunting Permit Program does this in unique situations.

WDFW does look in other state programs for examples.

We would attempt to exceed the acreage target. Changes to tax laws are beyond the scope of the Game Management Plan. WDFW would provide comment on any legislative proposals that might affect public access on private lands.

Support, better online (though this year is way better than previously) look. We will continue to try to make improvements to the information available.

WDFW does look in other state programs for examples.

Look to Wyoming which seems to get good cooperation. Thank you for your perspective.

The states utilize a variety of management tools which include both non-lethal and lethal measures to minimize wildlife conflict issues and assist private property owners.

Timber companies should be included. WDFW does work with timber companies to promote hunting access and in some parts of the state.

WDFW does work with timber companies to promote hunting access and in some parts of the state.

Very important. Thank you for your comment.

WDFW is in competition with unregulated guides for private land hunting access. Hunting leases obtained by these unregulated guides are tying up private land. Big game guides need to be licensed in Wa. state and the fees uses for public access programs.

Why stop there? That’s a good start, give them tax breaks before it all ends up getting auctioned to highest bidder pricing normal person out.

The licensing of guides will not solve the issue of lands leased by private hunt clubs and those available under WDFW agreements.

Yes, especially upland bird hunting. One major access problem is “hunting by written permission” sights makes it impossible to contact landowners. I have called phone numbers only to be told “we do not allow bird hunters on our land”, so why are we paying them?

Landowners in the Hunt by Written Permission and our other programs do have the ability to specify species that can be hunted. Permissions granted are monitored each year and we have dropped landowners who appear to be abusing the program.

Yes, important. Thank you for your support.

Objective 17: Complete an inventory of public lands by 2016 to evaluate situations where access is closed, impaired or at-risk and develop a strategy to address these issues.

PUBLIC COMMENT

Agree, also need to address non-compliance of vehicle restriction and target shooting regulations. We have added a strategy to the plan to try to encourage better compliance with landowner rules.

This is a very good, but it needs more detailed follow-up either with the legislature, or through the current RCO grant process. Work with other agencies, too, on this. Also seek legislation strengthening the liability protection (remove artificial dangerous latent condition language) for landowners that allow free access. Add an inventory of private lands that have traditionally allowed free public hunting and that land is now fee, lease or closed.

The information would be available to elected officials and grants may be sought to help fund the program.

Why can’t I access existing state and Federal that is behind private timber company gates? I run into Private landowners have the right to control access across their lands where right of ways.

No comment Acknowledged.

No tax break in no free access on land over 100 acres. Changes to tax laws are beyond the scope of the Game Management Plan but WDFW would provide comments on any proposed law change that might affect recreational access.

Thank you for your perspective.

Thank you for your perspective. support

sounds good but the record demonstrates for none of us to hold our breath! Thank you for your perspective.

We would attempt to exceed the acreage target. Changes to tax laws are beyond the scope of the Game Management Plan.

We would attempt to exceed the acreage target. Changes to tax laws are beyond the scope of the Game Management Plan.

The goal of finishing the process of making them all available in this format.

The locations of most sites can be found on the WDFW website and Objective 19 states.

Objective 14

Sounds expensive. Thank you for your perspective.

WDFW does work with timber companies to promote hunting access and in some parts of the state.

The program is intended to provide access incentive payments to landowners for ecotourism. The program is intended to provide access to landowners in WDFW access programs. However, due to the implementation of hunter access fees, property owner liability concerns and other issue associated with open public access this may be increasingly more difficult to achieve.

Individual landowner choices and analysis of the risks and problems associated with public access will drive the success of this objective. This leads me to Objective 17.

WDFW’s Landowner Hunting Permit Program does this in unique situations.

WDFW does look in other state programs for examples.

WDFW does work with timber companies to promote hunting access and in some parts of the state.

WDFW does work with timber companies to promote hunting access and in some parts of the state.
Address the fee access on private lands and how it influences less hunting licenses sold because of increased costs to the individual.

Access is increasingly a challenging issue for all public land managers, and with more large private landowners charging for recreational access, this definitely is a public policy matter. I know of the challenges for all forest and grasslands, tide and shore, and ag lands. Worth a public policy discussion.

A number of strategies are included under Objective 16 that are intended to address this issue. We agree, especially as public lands are likely to receive more public use if access to private lands becomes more limited.

allow greater freedom for land owners to participate with fewer restrictions.

We place very few restriction on landowners who participate in our programs and they are also able to allow public access without entering into an agreement with WDWF.

Always
Thank you for your comment.

Agree
Thank you for your support.

And open them
The intent is to gain public access for the public.

Any private landowner charging access fee needs to re-emburse the value of any game harvested. This idea might increase the amount that landowners might charge for access and additional costs for hunters.

Disagree
Thank you for your perspective.

Great idea.
Thank you for your support.

Tell me
Thank you for your support.

How will this be paid for?
The inventory should not come at any significant additional cost as it will be completed by existing staff funded through hunting license and federal matching funds.

I agree here
Thank you for your support.

I am assuming you meant PRIVATE lands? I support the strategy development. How about this -- teach people to drive only on roads, handle gates as instructed, do not trespass, do not litter, and bring a lot of fresh fish or homemade cookies for the landowner.

We are already aware of cases where access is closed or limited by private ownerships not all of which are timber owners. Land exchanges would be considered along with other methods to obtain access to public lands.

Any private landowner charging access fee needs to re-emburse the value of any game harvested. This idea might increase the amount that landowners might charge for access and additional costs for hunters.

The objective is to identify public lands that the public cannot access or where access could be blocked by private landowners. We agree that public behavior is part of the reason the landowners limit or close access. Our programs attempt to address these issues.

I recommend that we reduce human access to environmentally sensitive areas. Consider the needs and values of all residents of the state. I would like to see limits on hunting on public land, some areas completely human-free. If wildlife can't be at home on public lands, where will their homes be?

We acknowledge that there are areas where increased human activity may be detrimental and this would be considered.

I would need to know more about the issue.

Not all currently do and cannot be forced to do so under current law. This objective seeks to secure access with tools we can currently work with.

Private landowners should allow an access easement to public lands that are landlocked.

These actions are all included in the strategies under this objective.

Public lands are just that public and to just close them to the public is wrong. More enforcement to those who abuse the lands should be used.

We have added a strategy to the plan to try to encourage better compliance with landowner rules.

Seems like a waste of money and highly subjective. Is this about quality wildlife habitat or ease of hunter access? The two can and are often conflicting. Closed access tends to mean better chances for wildlife escapement. DFW shouldn't be catering to lazy hunters.

We recognize that there is a balance when managing access. The objective is related to public lands where there is no public access where it would be reasonable to increase access. Access would not necessarily be by vehicle.

Sooner 2014
Agency staff may be aware of some of these issues but it has not been compiled. A formal inventory will take some time to develop and we will attempt to complete it sooner.

sooner the better
This objective is a high priority.

spend money to open up land owned by timber companies for hunting; make it by application if necessary.

This is within the scope of the strategies under Objective 16.

Stop giving private landowners special treatment if they charge for access. Give them incentives to open up free access.

The strategies under this objective are intended to do this.

Strongly Agree
Thank you for your support.

Strongly agree! Too bad federal lands are minimally accessible.

Thank you for your support.

Sure --- we've only been complaining about it forever. Thank you for your comment.

The department should not spend any resources on this objective. Instead, focus resources on protection of wildlife populations and habitat that are enhanced by closing and restricting roaded areas.

Thank you for your perspective. Access pursued would not necessarily be by vehicle but it would vary by site and the resources involved.

This is a very important issue, I know of many large blocks of DNR land that have no public access. They are used by adjacent landowners as their own private hunting reserves.

Thank you for your comment.

Touring it should have been done already. Address the known situations fix them first and then move on.

Hopefully we can complete this sooner and the results will help to secure support for addressing the issue.

Town hall meetings before season to introduce hunters to landowners for hook up. Thank you for your suggestion. This may be considered.

Very important! Make your inventory PUBLIC! Once completed, the inventory would be available to the public.

Agree and in some cases access may be closed to all hunters.

We should already have this information per region! Should not take until 2016 to get this together.

Agency staff may be aware of some of these issues but it has not been compiled. A formal inventory will take some time to develop and we will attempt to complete it sooner.

Work with timber companies to open up free access to timber lands

Working with all landowners including timber companies is included in this and other objectives in this chapter.

Yes after losing access to many former public access areas. Let's find out why small steelhead access on the North Fork of the Stilly just disappeared?

Thank you for your support. This comment has also been forwarded to the Fish and Lands programs in our Mill Creek office.

YES! Strongly support
Thank you for your support.

Yes, and again the citizens should be utilizing the thousands of acres of state parks land for all types hunting.

Allowing hunting in state parks would require legislative action but would probably have significant opposition as well. In light of other uses, the acreage that might be suitable, would require evaluation.
**Objective 18: By 2016, make improvements to the current reservation system that allow drawing for some reservations and adds flexibility as to when reservations first become available to the public. Add other features to meet the needs of hunters and landowners and make the program more efficient to administer.**

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>reduce the size and scope and leave this to private parties ... this is not a function of state government.</td>
<td>A system like this has been requested by hunters prior to its development. It has also been attractive to landowners who are willing to provide public access but want some control over hunter numbers but not want to handle this aspect themselves.</td>
</tr>
<tr>
<td>Reservation system sucks. Landowners generally do a better job of this than WDFW.</td>
<td>We realize that some hunters who have had agreements with landowners to hunt properties that are now in the reservation system have been unhappy with the new system. However we have received positive responses from other hunters who have new opportunities and landowners who were weary of hunter requests. Landowner participation is optional.</td>
</tr>
<tr>
<td>This system needs to be more flexible and maybe with a limit on the # of acres assigned to a hunter or group. While I understand landowner frustration, this system closes huge tracks of land to all but a very few hunters under the guise of providing additional access sometimes. Also consider lowering the length (# of Days) of reservations as some tracts could be vacant for much of a reservation if someone were to harvest the game they seek on the first day.</td>
<td>All of these ideas are already under consideration after one year of experience in operating the program. We will continually try to improve how schedules are determined to optimize the benefits.</td>
</tr>
<tr>
<td>Agreed need to use a liaison between the hunters and a direct tribal member that is appointed.</td>
<td></td>
</tr>
<tr>
<td>The hunt by reservation system is new and has not yet been used in some parts of the state. Further explanation has been added to the issue statement to address this comment.</td>
<td></td>
</tr>
<tr>
<td>The department has considered a fee for use of the system to support its operation but none is currently in place.</td>
<td></td>
</tr>
<tr>
<td>The system has not had any interruptions in service but its popularity has made it difficult to make reservations on a first come first served basis. The addition of a drawing system for the most popular sites should help make the system more fair and flexible.</td>
<td></td>
</tr>
<tr>
<td>The hunt by written permission option is still available to landowners. The reservation system has opened some ownerships to more hunters. How hunt schedules are determined does need review and we will adapt to optimize the opportunities available.</td>
<td></td>
</tr>
<tr>
<td>The system has had the recent fees charged by timber companies are reducing opportunity. I understand that these are private lands. However, public funds are spent for fire suppression and road maintenance. Are these fees going to be denied if the timber companies deny access without charging the public fees? If dumping and vandalism are the reasons for the fees, lock the gates for ALL hunting seasons. Hunters don't carry old appliances and trash on their backs if they have to walk in from closed gates.</td>
<td></td>
</tr>
<tr>
<td>The hunting access fee program is in place and is working well. It is providing an opportunity for access.</td>
<td></td>
</tr>
<tr>
<td>Mowing has been added to the issue statement to avoid this confusion in the future.</td>
<td></td>
</tr>
<tr>
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<td></td>
</tr>
<tr>
<td>This objective does not apply to tribal reservations but rather a system where hunters can make reservations to hunt on private lands or quality hunting sites on private lands.</td>
<td></td>
</tr>
<tr>
<td>Acknowledged. Thank you for your comment.</td>
<td></td>
</tr>
<tr>
<td>Agree, although I rarely use this system except for hunts in my local area.</td>
<td></td>
</tr>
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<td>The department has considered a fee for use of the system to support its operation but none is currently in place.</td>
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<td></td>
</tr>
<tr>
<td>Consider drawing permits to hunt certain areas rather than reservations or a lottery for reservations.</td>
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</tr>
<tr>
<td>The department has considered a fee for use of the system to support its operation but none is currently in place.</td>
<td></td>
</tr>
<tr>
<td>Don't know exactly what this means</td>
<td></td>
</tr>
<tr>
<td>The hunt by reservation system is new and has not yet been used in some parts of the state. Further explanation has been added to the issue statement to address this comment.</td>
<td></td>
</tr>
<tr>
<td>End reservations.</td>
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<td></td>
</tr>
</tbody>
</table>
As long as landowners wishes are met regarding access.

Use social networking free to public

Would be impressed if you pulled this off

Yes

Yes, the fair.

Yes, without spending a fortune though.

Objective 19: By the beginning of 2015, assure that all landowner access agreements are included in the private lands database and add the ability for hunters to locate properties meeting their needs on the WDFW website by adding a search tool. Improve and update information about access opportunities included in written materials and hunting pamphlets.

PUBLIC COMMENT

How about including Names, Addresses, Phone numbers, eMails, time of day, date range, something to help hunters know when they can solicit permission from the landowner? Landowners have other things to do besides wait by the phone for a call from a hunter, and hunters have other things to do than make numerous phone calls to answering systems that never respond or spend endless amounts of time looking up the owner's name and a method for contacting them. How about developing a registration database similar to Kalkomny for soliciting access to private lands?

You have traded excellent progress at trying to incorporate these tools in GO HUNT. Having maps of feel free to hunt areas is essential since there are no landowner contacts. You also need to include information about when and how to contact landowners for written permission only lands -- e.g., call tuesdays or thursdays 6pm to 9pm at 509 555-5555 and ask for farmer jones.

I do not know if this is aimed at the written permission for hunting on landowners. I tried for three days to get permission on a late deer tags in the Mayview unit without success. Numbers were on the signs but disconnected or not answering. Signs were up in allot of areas that had not name or number to call.

Some landowners in the program allow other types of access and in we hope to expand

The Big Game book is too big and confusing now.

I don't know how enthusiastic the Okanogan crowd will be about this, but I continue to believe we hear mostly from the loudmouths. Some I've known years ago, and I understand what ticked them off "back when." Hard for me to accept the braying of some of these days, tending to blame their hear mostly from the loudmouths. Some I've known years ago, and I understand what ticked them off "back when." Hard for me to accept the braying of some of these days, tending to blame their

Acknowledged

WDFW does look to other states for examples.

The information that would be included in pamphlets would be intended to help hunters understand how the private lands program works and would not necessarily add to the size of the document.

WDFW does also works to improve habitat and recreation on public lands but by working with private landowners we increase the potential capacity for larger wildlife populations and recreational opportunities.

The process is already partially complete and will be completed sooner if possible.

WDFW does look to other states for examples.

The new hunt by reservation system was developed, in part, to address this issue.

The new hunt by reservation system is designed, in part, to help landowners allow access that do not want to communicate directly with hunters but still want some control on hunter numbers and other aspects of how hunting is managed on their property.

The new hunt by reservation system was developed, in part, to address this issue. The

Another consideration is the ability to use it to find open access hunting opportunities over in eastern Washington, but when I physically got there in my pick-up to scout the area, I didn't have access to the computer to further refine my search. Confusing and very frustrating. I didn't hunt in eastern Washington that year because I was unsure of land areas that were supposedly open.

Some landowners grow weary of make it harder for hunters to gain access. We agree that landowners grow weary of cause some landowners to decline participation in the program which would actually make it harder for hunters to gain access. We agree that landowners grow weary of cause some landowners to decline participation in the program which would actually

The new mobile phone application may be considered which would address this need and a strategy has been added that would reflect this.

These sites would be included as well. We do acknowledge that this experience does occur. The new hunt by reservation system was developed, in part, to address this issue.

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Model after state of Montana plan

The new hunt by reservation system was developed, in part, to address this issue.

Any landowner who receives accommodation for wildlife damage should be required to enter an access agreement with WDFW and have his or her land registered in the private lands database as open to the public for hunting.

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Great id

This is critical to the public hunting opportunities.

This is important to assure that hunters know property boundaries and respect peoples private land.

This is an interesting idea and we are sure that some landowners may use it already. The hunt by reservation system is designed, in part, to help landowners allow access that do not want to communicate directly with hunters but still want some control on hunter numbers and other aspects of how hunting is managed on their property.

The process is already partially complete and will be completed sooner if possible.

This is already in practice. A rule regarding contact times may be a good idea and

We are always trying to increase landowner awareness of our program and the resources we can offer. A strategy has been added under Objective 16 to reflect this.

Yes, badly needed

This was unsure of land areas that were supposedly open.

Thanks for your support.

Here is the state not be in this business, there are plenty of public lands that should be developed for better habitat and enhancement not private lands.

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This is important to assure that hunters know property boundaries and respect peoples private land.

Acknowledged.

The state should not be in this business, there are plenty of public lands that should be developed for better habitat and enhancement not private lands.

Yes, this has been considered.

The information that would be included in pamphlets would be intended to help hunters understand how the private lands program works and would not necessarily add to the size of the document.

The new mobile phone application may be considered which would address this need and a strategy has been added that would reflect this.

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The process is already partially complete and will be completed sooner if possible.

The information that would be included in pamphlets would be intended to help hunters understand how the private lands program works and would not necessarily add to the size of the document.

Yes, good idea

This is critical to the public hunting opportunities.

This would be great!

Thank you for your support.

This is an interesting idea and we are sure that some landowners may use it already. The hunt by reservation system is designed, in part, to help landowners allow access that do not want to communicate directly with hunters but still want some control on hunter numbers and other aspects of how hunting is managed on their property.

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This is already in practice. A rule regarding contact times may be a good idea and
The Wolf Plan establishes mechanisms for addressing wolf-livestock conflicts without the need for...young animals to encounter humans, resulting in complaints (Lambert et al. 2006). Hunting of cougars was resulting in a very young age structure of the population and a higher...was increasing, as presumed. Instead, the State’s cougar population was declining, but heavy...sounds good. Should consider begging in offices go investigate if not enough coverage by wardens.

mitigation permits issued should be by demustrated need. No land owner fees should be permitted for public access. Be careful manding timed responses (72 hrs) when you have limited staff & budget. Just call a master hunter to go kill an elk like you been doing: NOT. OK

Yes, as a farmer, my crop can be destroyed in 2 hrs. by deer and elk. 72 hours is unacceptable, should be less 12. You plant cherries in the woods, figure out how to keep the animals out. It should be the responsibility of the landowner. Possibly.

Not necessary. Agriculture far less important than game animals. Another private land issue. Shouldn’t be a front burner priority.

Perhaps clarifying and presenting the steps taken before lethal action can be used would benefit both landowners and the public here. As of now it seems this is a subjective, process that is hard to track. Maybe this could be part of the standardized data collection system described in Objective 25?

The WDFW response needs to occur within 12 hours. Otherwise landowners feel like their issues are being ignored by the WDFW.

III. Recreational Hunting is not an Effective Means to Address Livestock Conflicts

The GMP SEIS at pp. 37-38 and 40-41 discusses, among other things, the use of recreational hunting of carnivores to reduce livestock depredations. It cites to the use of such strategies with respect to bears and mountain lions and intimates that wolf-livestock conflicts may end up being treated similarly. But, for the reasons stated above, livestock conflicts with wolves cannot be effectively resolved through establishing recreational hunting seasons on wolves.

The Department should also be reconsidering its use of recreational hunting seasons as a means to resolve livestock conflicts with bears and mountain lions. A recently-published study on Washington cougars and associated hunting of cougars in the State reports that increased hunting resulted in male cougars expanding their home range, increased overlap in territorial cougar ranges and increased complaints about cougars (Maletzke et al. 2014). These negative demographic effects for cougars also have potential unintended consequences for managers (Id.). An earlier study found that an increased number of complaints regarding cougars were not indicative that the Washington cougar population was increasing, as presumed. Instead, the State’s cougar population was declining, but heavy hunting of cougars was resulting in a very young age structure of the population and a higher probability of young animals to encounter humans, resulting in complaints (Lambert et al. 2006). Thus the state sanctioned increased hunting of cougars resulted in increased, not decreased, conflicts.

The Wolf Plan establishes mechanisms for addressing wolf-livestock conflicts without the need for recreational hunting of wolves. The Wolf Plan’s emphasis on the use of non-lethal conflict methods and strategies for reducing, resolving and preventing wolf-livestock conflicts should continue to be the focus of the Department’s efforts in this arena.

I recently heard a landowner who does not make his land generally available to the public claim he had received two “landowner” taps for his own use, and two more that he could do with whatever he wished to do with them. This is wrong. If word of this becomes generally known, it will surely damage the WDFW and hunters in the eyes of the non-hunting public, and rightly so. I am a hunter and a landowner who has had damage attributable to elk & deer, and I believe that most of these complaints are grossly overstated. In those cases where the complaints have merit, accommodations should still not be made unless the complaining landowner has opened his land to the public for hunting.

Instead of hiring pro hunters to harvest deer and elk that are causing other those hunts to disabled hunters when possible and to the other tag holders when not. If you must spend the money on biologist to accompany the hunter to gather samples.

It is critical that the state respect private property and to that end the state should allow proper property owners to protect their property from wildlife when it becomes evident, the property owner should not be obligated to outside groups to provide hunting opportunities or the carcass of the animal as a condition of lethal harvesting to protect his property.

Objective 21: Maintain or decrease livestock depredations levels over the period 2015-2021.

PUBLIC COMMENT

Support Objective

(4 comments) Oppose Objective

Public Comments for Objective 21

WDFW RESPONSE

Thank you for your support. Your comments are important to us.

Thank you for your perspective. Your comments are important to us.

Decrease the depredation by decreasing the species causing the depredation. Thank you for your perspective. WDFW would like depredation incidents to remain stable or decreasing as carnivore populations fluctuate (likely increased).

Do not “maintain”. This should be a decrease only. Thank you for your participation. Objective 27 addresses this topic.

Evaluate the non-lethal methods of decreasing livestock depredations that are already in use. Thank you for your support. Your comments are important to us.

How is this to be done...especially in the case of wolves which are an endangered species? Thank you for your participation. As outlined in the Wolf Conservation and Management Plan a variety tools and techniques can be employed to minimize negative encounters.
between livestock and wolves.

Methods need to be based on science, not hearsay and ear-mongering.

Thank you for your perspective. WDFW currently employs a variety of conflict management techniques to minimize potential negative encounters with livestock and carnivores.

Ranchers must be required to utilize non-lethal methods for protecting their livestock. Livestock should not be allowed on public lands that provide habitat for wolves and other predators.

Thank you for your participation. WDFW currently manages wildlife populations using a variety of tools, including predator control programs.

Reduce or maintain the number of predators, don't try to increase them then complain about livestock losses.

Thank you for your perspective. While depredation levels may seem statistically insignificant, WDFW is mandated to assist landowners with mitigating wildlife conflict.

This is the goal - utilize as many "volunteer" programs as possible - there are 1860s of retired people who would be available...

Thank you for your perspective. This objective will require developing cooperative efforts with residents, livestock producers, and WDFW.

This plan should include a public debate and comment period before implementation.

Thank you for your participation.

Why not do this for forestry as well?

Thank you for your participation. WDFW would like depredation incidents to remain stable or decreasing as carnivore population numbers fluctuate (likely increase).

Yes, using NON lethal means such as range riders, guard dogs, telemetry etc

Thank you for your participation. WDFW currently works with landowners to employ a variety of conflict management techniques to minimize potential negative encounters with livestock and carnivores.

Yes, see earlier comments. My hope is that we work towards preventative education for coexistence rather than a post-killed contraction model.

Thank you for your participation. WDFW currently employs a variety of conflict management techniques to minimize potential negative encounters with livestock and carnivores.

This goal should be achieved exclusively through the active use by livestock owners of non-lethal means to limit predation, and an increase of compensation for livestock owners who use non-lethal means and still experience predation of their livestock.

Thank you for your participation. WDFW currently compensates for livestock loss due to bear and cougar and when funding is appropriated.

Livestock depredation is mostly caused by careless humans. Teaching farmers how to prevent depredation will decrease it. Killing predator parents increases conflicts from youngsters who have lost their guides.

Thank you for your participation. WDFW would like depredation incidents to remain stable or decreasing as carnivore population numbers fluctuate (likely increase).

Absolutely minimize use of lethal means & strongly encourage the use of non-lethal means as well as promoting proper care & protection of livestock.

Thank you for your participation. WDFW places emphasis on use on non-lethal measures, when feasible, pre and post conflict incidents.

Admit it when depredation is by wolves, quit trying to make them out to cute and fuzzy, they don't just kill the old and weak, and they will kill for sport.

Thank you for your perspective. While depredation levels may seem statistically insignificant, WDFW is mandated to assist landowners with mitigating wildlife conflict.

Need to allow hunters to kill more predators.

Thank you for your perspective. Hunting seasons and limits for all game species are reviewed annually based on population numbers and analyses at both statewide and smaller geographic levels.

Yes based on ACCURATE INFORMATION.

Thank you for your comment.

I agree with this objective.

Thank you for your comment.

This is not a real level unless the number of livestock stays the same.

Thank you for your perspective. While depredation levels may seem statistically insignificant, WDFW is mandated to assist landowners with mitigating wildlife conflict.

Require livestock owners to allow scientist to verify the cause of death of the livestock to make sure the death was caused by a predator. A farmer/rancher/home owners claim is not sufficient to count the depredation as being caused by a predator.

Thank you for your participation. WDFW currently compensates for livestock loss due to bear and cougar and when funding is appropriated.

Use depredation hunts (lottery of license holders) rather than offering up tags to landowners as they are a public resource, not the landowners.

Thank you for your perspective. WDFW utilizes a variety of tools, including depredation hunts, when necessary to abate various levels of conflict; particularly those events that pose a public safety threat.

Decrease depredation needed badly now

Thank you for your participation. Your comments are important to us.

Focus resources on co-existence efforts. Require livestock owners that use public (federal or state) lands to participate in co-existence programs.

WDFW works with livestock producers to employ non-lethal conflict prevention measures.

Decrease livestock on public land

Thank you for your perspective.

Get rid of the wolves

No comment

Thank you for your participation.

These levels are currently negligent. Recommend removing this objective unless these levels show a statistically significant (e.g. >5%) increase, and remove the burden back to private industry for exploring adequate legal and non-lethal deterrence methods.

Thank you for your participation. While depredation levels may seem statistically insignificant, WDFW is mandated to assist landowners with mitigating wildlife conflict.

Yes we need to harvest more wolves and cougars to limit predators attacking wildlife.

Thank you for your perspective. WDFW currently compensates for livestock loss due to bear and cougar and when funding is appropriated.

I think this is not a goal solely for WDFW to attain. Stock owners knowledge, their degree of energy and resources available to make changes in their operations - some are pure lary. I think flunked 4th. Time to move on. Not a charitable response, I know. Took a variety of events to put some orchardists out of business who produced poor products. A more vital industry now in our state.

Thank you for your perspective. WDFW currently manages wildlife populations using a variety of measures including habitat assessments and carrying capacity.

Manage the livestock to decrease its depredation.

Thank you for your participation. Your comments are important to us.

also maintain the amount of space given to the predators that were eradicated for the benefit of the "ranchers"

Thank you for your participation. WDFW currently manages wildlife populations using a variety of measures including habitat assessments and carrying capacity.

Open cougar seasons to year round. Open more spring bear on the west side. Don't award damage tags to timber companies who charge the tagholder for access.

Thank you for your perspective.

Wolf management

Thank you for your participation.

compensate livestock owners for losses as part of the plan.

Thank you for your participation. WDFW currently compensates for livestock loss caused by wolves. Additionally, WDFW has the authority to compensate for livestock loss due to bear and cougar and when funding is appropriated.

Decrease

Thank you for your perspective.

None, a decrease would be best.

Thank you for your perspective.

I don't think this is necessarily the job of WDFW

Thank you for your perspective.

Decrease

Thank you for your perspective.

If the livestock are on public lands then there should be no compensation for lost livestock. The
<table>
<thead>
<tr>
<th>Predators are just doing what comes natural. If the losses are on landowners property then make adjustments and allow compensation.</th>
<th>by wolves in accordance with the Wolf Conservation and Management Plan. Additionally, WDFW has the authority to compensate for livestock loss due to bear and cougar and when funding is appropriated. In either scenario, no differentiation is made between private or public lands.</th>
</tr>
</thead>
<tbody>
<tr>
<td>okay</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Not an issue</td>
<td>Thank you for your participation. Your comments are important to us.</td>
</tr>
<tr>
<td>Really? More wolves with less livestock depredation? Are you going to hold “wolf training” classes to educate wolves to leave livestock alone to make this objective?</td>
<td>Thank you for your perspective. WDFW would like depredation incidents to remain stable or decreasing despite changes wolf population levels.</td>
</tr>
<tr>
<td>Along with wolf recovery...good luck with this one!</td>
<td>Thank you for your perspective. WDFW would like depredation incidents to remain stable or decreasing despite changes wolf population levels.</td>
</tr>
<tr>
<td>Continue to use non-lethal measures such as range riders, fladry and prompt carcass disposal to limit livestock depredation. Lethal measures should only be used as a last resort.</td>
<td>Thank you for your perspective. WDFW would like depredation incidents to remain stable or decreasing despite changes wolf population levels.</td>
</tr>
<tr>
<td>Hell yes! Less wolves equal less livestock problems.</td>
<td>Thank you for your perspective. Your comments are important to us.</td>
</tr>
<tr>
<td>How are you going to achieve that with wolves increasing?</td>
<td>Thank you for your perspective. WDFW would like depredation incidents to remain stable or decreasing despite changes wolf population levels.</td>
</tr>
<tr>
<td>Decrease</td>
<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>Increase</td>
<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>Yes. There are many racing pigeons being killed in this state by Coopers Hawks that are very valuable birds with no recourse for the owners to protect their property. Some pigeons are worth more than a cow which get some department action for protection. Let's be fair to all!</td>
<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>Decrease, kill more wolves. Reopen hound hunting for cats and bears. Use non-lethal proactive deterrents to prevent depredation as much as possible. It would be neat to have a fund that the public can donate to to fund specifically non-lethal tools to prevent depredation from native predators.</td>
<td>Thank you for your participation. Currently, WDFW works with livestock producers to employ proactive, non-lethal, conflict prevention measures, where feasible. Developing partnerships and exploring new innovative methods to support conflict mitigation measures is an important point for WDFW.</td>
</tr>
<tr>
<td>This seems to conflict with current wolf &quot;management goals&quot;</td>
<td>Thank you for your participation. WDFW would like depredation incidents to remain stable or decreasing despite changes wolf population levels.</td>
</tr>
<tr>
<td>If possible, but it may not be so with wolves, coyotes etc. Perhaps a reasonable compensation is more appropriate.</td>
<td>Thank you for your perspective. WDFW would like depredation incidents to remain stable or decreasing despite changes carnivore population levels.</td>
</tr>
<tr>
<td>Empower the livestock owners to address their own issues and the complaints will drop off.</td>
<td>Thank you for your participation. Currently, WDFW works with livestock owners to employ proactive, non-lethal, conflict prevention measures, where feasible. Additionally, state law allows livestock owners, under certain circumstances, to protect their property.</td>
</tr>
<tr>
<td>The WDFW’s goal should be to work towards zero depredations fully understanding that is not likely.</td>
<td>Thank you for your comments. WDFW will continue working closely with livestock producers to provide them with current information on techniques and to assist them with minimizing loss. Concurrently, WDFW is mandated by law to manage wildlife populations statewide.</td>
</tr>
<tr>
<td>Strategies:</td>
<td>WDFW is prepared to use lethal removal when necessary and will follow Department protocols for taking lethal action when necessary as a direct response to depredation events.</td>
</tr>
<tr>
<td>a. Provide livestock producers and owners with printed information materials to minimize conflict with carnivores (page 40). This is a good goal and one that the WDFW should continually work towards.</td>
<td>During the recovery period, WDFW is actively involved in capture and collaring of wolves to better assess recovery of the species.</td>
</tr>
<tr>
<td>b. Promote the use of WDFW agreements for livestock to commercial livestock producers, and encourage the use of a non-lethal prevention measures checklist (page 41). Livestock producers expect the WDFW to do its job and efficiently and effectively manage carnivores.</td>
<td></td>
</tr>
<tr>
<td>c. Promote the use of non-lethal conflict prevention measures and a prevention measures checklist to non-commercial producers (page 41). The WDFW needs to be prepared to utilize lethal force where applicable when needed.</td>
<td></td>
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<tr>
<td>d. Develop response protocols for carnivore depredation on livestock (page 43). The response needs to be fast and effective.</td>
<td></td>
</tr>
<tr>
<td>e. Use hazing and other non-lethal prevention measures to minimize potential loss or injury (page 41). The WDFW needs to do this as quickly as possible.</td>
<td></td>
</tr>
<tr>
<td>f. Encourage recreational harvest (black bear and cougar), where feasible, in areas with chronic depredation events (page 41). We agree.</td>
<td></td>
</tr>
<tr>
<td>g. Review and improve the techniques used for lethal removal of offending animals (page 41). We agree.</td>
<td></td>
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</tbody>
</table>

**Strategies:**

- a. Provide livestock producers and owners with printed information materials to minimize conflict with carnivores (page 40).
- b. Promote the use of WDFW agreements for livestock to commercial livestock producers, and encourage the use of a non-lethal prevention measures checklist (page 41).
- c. Promote the use of non-lethal conflict prevention measures and a prevention measures checklist to non-commercial producers (page 41).
- d. Develop response protocols for carnivore depredation on livestock (page 43). The response needs to be fast and effective.
- e. Use hazing and other non-lethal prevention measures to minimize potential loss or injury (page 41). The WDFW needs to do this as quickly as possible.
- f. Encourage recreational harvest (black bear and cougar), where feasible, in areas with chronic depredation events (page 41).
- g. Review and improve the techniques used for lethal removal of offending animals (page 41).
41). Livestock producers expect the WDFW to do its job and efficiently and effectively manage wolves. The WDFW needs to do this as quickly as possible.

b. Utilize agency kill authority and depredation permits, when feasible, for carnivore depredations on livestock, consistent with federal Endangered Species Act (page 4).

We agree.

General Comment

WDFW needs to make it a priority to collar as many wolves as possible in each different pack so it can better define pack areas to help define problem wolves, breeding pairs and general population.

Remove all lethal options for "wolf management" via a via livestock predation or population control. The burden is on private industry to explore ethical, straightforward, readily available non-lethal deterrent options, and any further depredations should be considered the cost of doing business in a wild environment. Government agencies should not be in the business of compensating private industry for well known risks or environmental factors.

Healthy and robust wildlife systems should include healthy and growing populations of native predators, including wolves and cougars. While it should be noted that reducing or eliminating human injury and death is always paramount, many people come to western wilderness areas to catch safe glimpses of these predators. In addition, allowing farmers and livestock breeders to indiscriminately hunt and kill wolves and cougars disturbs the predator-prey ratio. I would rather see more of our wildlife budget go toward non-lethal methods of relocating or reducing predator-human interactions than issuing hunting licenses for these animals. Also, unreported kills will likely increase the damage from elk, deer and similar ungulates to crops and native flora in the same range.

Objective 22: Decrease or minimize the number of urban-human-wildlife conflict calls requiring WDFW response so that the number of calls is constant or declining over the period 2015-2021.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
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<tbody>
<tr>
<td>(27 comments) Support Objective</td>
</tr>
<tr>
<td>(2 comments) Oppose Objective</td>
</tr>
<tr>
<td>(3 comments) Ok</td>
</tr>
<tr>
<td>(2 comments) No comment</td>
</tr>
<tr>
<td>(12 comments)</td>
</tr>
</tbody>
</table>

WDFW RESPONSE

- Thank you for your support. Your comments are important to us.
- Thank you for your participation. Your comments are important to us.
- Thank you for your comment.
- Thank you for your participation.
- Through public education and not issuing hunting tags for cougars and bears who would stay away from humans if they have parents.
- Again, emphasize co-existence measures, based on science. Educate the public on this.
- Allow private parties to deal with problems when state cannot deal with them.
- Do not allow wolves to reach the west side.
- This is a really flawed idea. The USDA unit does not have the same perspective as WDFW and has, on numerous occasions, done more harm than good with an animal issue.
- This does not mean that WDFW is planning to shift this issue to the Dept. of Agriculture's Animal Control? If so, this is a seriously flawed idea. The USDA unit does not have the same perspective as WDFW and has, on numerous occasions, done more harm than good with an animal issue.
- How? AT the expense of the wildlife is NOT ACCEPTABLE.
- How? The US Department of Agriculture's Animal Conflict? If so, this is a seriously flawed idea. The USDA unit does not have the same perspective as WDFW and has, on numerous occasions, done more harm than good with an animal issue.
- Thank you for your perspective. WDFW attempts to employ and provide non-lethal measures to the public to minimize negative encounters. We encourage the public to use simple measures, provided on the department's web site, to prevent conflict with wildlife.
- Thank you for your participation. WDFW generally responds to conflicts in urban areas that present a public safety threat, most other urban wildlife conflict events are handled by the landowner, private wildlife control operators, and other government or municipal organizations. WDFW would like to expand the partnerships with these other entities to promote preemptive actions, develop local ordinances, identify priority areas, create programs that reduce the likelihood of human-wildlife conflict, etc.
- Good luck.
- Thank you for your participation.

Human-wildlife conflicts have existed for eons. It's called natural selection.

Thank you for your perspective. Your comments are important to us.

I don't know how to get ahead of the fact that more and more of our citizens are "wildlife smart," in how they produce these conflicts. Building out into wildlife's habitat, some times displacing quickly and others times not ... More education. You and other public service agencies are stuck with public sentiment mostly not supporting your responses where killing the critter is the solution at the moment. The victim is implicitly the homeowner or recreationist, not the critter.

Increase the hunting opportunity on cat and bear in the areas of concern or use professional hunters with dogs as a tool.

Thank you for your participation. WDFW utilizes a variety of tools, including hunting opportunities, to minimize wildlife conflict issues.

Increase the use of the Karelian Bear Dog program for resolving human-wildlife conflicts.

Thank you for your perspective. Your comments are important to us.

Rewards

Maximizing the knowledge about non-lethal methods to decrease livestock depletion that results in zero casualties due to depredation.

Thank you for your comment. Communication and outreach are essential measures to increase the public's ability to prevent and resolve problems with wildlife.

Need for trapping coyotes.

Thank you for your participation. Washington coyotes may be removed year round. Additionally, WDFW allows for capture of coyotes through a special trapping permit.

Nice idea – not sure how you do it. Here is an idea, respond to wildlife conflicts in rural areas first and in urban areas only when you have spare time.

Thank you for your participation. WDFW generally responds to conflicts in urban areas that present a public safety threat, most other urban wildlife conflict events are handled by the landowner, private wildlife control operators, and other government or municipal organizations. WDFW would like to expand the partnerships with these other entities.

Not a problem unless you're a tabby-cat or Chihuahua.

Thank you for your perspective. WDFW utilizes wildlife conflict data to assist in reason setting for a variety of species.

Re-instate hunting for Bears and Cougars.

Thank you for your participation. WDFW utilizes wildlife conflict data to assist in reason setting for a variety of species.

Stop non-lethal programs.

Thank you for your perspective. WDFW utilizes wildlife conflict data to assist in reason setting for a variety of species.
Start educating people who chose to live areas where the wild animals live on how to prevent conflicts. If the humans are moving into the animals' homes, then they need to be better stewards as the animals can't move somewhere else.

That will be hard to accomplish as there are more humans expanding all the time resulting in more conflicts with wildlife.

That's just not going to happen. Honestly, think about it. People are building more and more homes where the wildlife lives, we are to blame for the problems not the wildlife. Face the facts, the further we spread out into their habitat the more issues there are going to be. If you built your house on the in a flood plain would you really expect the state to pay for the damages every time the river flooded? Use some common sense on that one.

This is impossible with the urban growth our state is having...this objective should say "educate the public on human-wildlife conflicts".

This plan should include a public debate and comment period before implementation.

This should be done with local planning regulations that provide places for wildlife to live instead of urbanizing everything and making it easy for those who move into conflict area.

Tough nut to crack with urban development.

URBAN...so here you need to remember how bear and cats were run back up in the hills far enough to escape the pressure of hound hunters. A most notable tool for keeping bear and cat away from developed urban areas.

WDFW doesn't even really care about these calls anyway. Their response is pathetic. If you continue to ignore them then the number will go down I guess. Needs to be some kind of broad education about living with wildlife.

With the number of humans on the wildland interface increasing, it may not be possible. We enjoy our troublesome wildlife.

Without hound hunting good luck

Wolves should be translocated to Washington's three National Parks.

You like the V.A. Fancy book

Yes help by wildlife department in the trapping and removal of problem animals. We lose cats in Edmonds monthly to coyotes.

Yes. Humans come first.

Yes, let's talk a lot of public education it is the best means to reduce complaints

You are not talking about killing things, are you?

Objective 23: Reduce number of permits requested to lethally remove black bears for timber damage over the period 2015-2021.

PUBLIC COMMENT

(29 comments) Support Objective

WDFW RESPONSE

Thank you for your support. Your comments are important to us.

(18 comments) Oppose Objective

(2 comments) I agree with this objective.

Absolutely the wrong idea - maybe we should re-train the bears?? There are too many bears, they cause millions in damage. Hunting them for the general public has become a "needless as a haystack" - bring back a bait program, hounds and increase the depredation program. People have right to protect their property.

Thank you for your perspective. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. WDFW strongly believes conflict management programs that utilize a variety of methods are the most successful at mitigating and minimizing wildlife conflict problems.

Agree.

A-firmative!!!!!!!!!

Thank you for your comments.

Agree, in fact issue no permits to those timber companies who lock up their land or charge fees for use

Thank you for your perspective. Currently, landowners who receive damage permits are required to allow some level of hunting access. WDFW is actively working with landowners to enhance hunter access during specified periods of time in areas where hunter participation may assist in mitigating and preventing damage.

Allow hound and bat hunting for black bear and these numbers will be reduced

Thank you for your perspective. WDFW would like to expand partnerships with these local entities to promote preemptive actions, develop local ordinances, identify priority areas, create programs that reduce the likelihood of human-wildlife conflict, etc.

Objective 23: Reduce number of permits requested to lethally remove black bears for timber damage over the period 2015-2021.

PUBLIC COMMENT

Thank you for your perspective. Your comments are important to us.

WDFW RESPONSE

Thank you for your participation. Your comments are important to us.

As written the objective scales the hell out of me and perpetuates the perception those of us with bear damage have had for several years that the department's end goal is stopping all depredation permits and leave landowners totally naked without any effective tools to protect our property. After visiting with Stephanie last night I'm a little less scared, but the perception remains alive. I understand this could be an easy/convenient way to measure "timber damage", but I fear it's more likely a way to measure the effectiveness of WDFW people/processes that further restrict our ability to protect our crops. More correctly, this objective should be (in my opinion): "Reduce the amount of bear caused timber damage over the period 2015-2021." Admittedly my language is a tough objective to measure objectively, but my proposed language better reflects the true intentions voiced by Stephanie last night. Ideally there are other potentially effective and economical tools that wouldn't reduce the significance of bear damage BUT until those other tools are readily available I'm not inclined to give up the only effective (partially) tools available, nor is it in the best interest of desired partnerships between WDFW and private landowners to perpetuate the perception (our reality) of landowners that WDFW cares more about individual critters than they do about having folks like ourselves continue providing habitat for all the state critters (greater good!).

Messing is important, particularly to those of use feeling abused and coerced (by a process that admittedly is only partially under WDFW control) - we need to feel that WDFW wants help us with critter problems, just like they do for city folks and several other farm/ranch/ag folks. Another important factor seemingly lost on the one-size-fits-all processes is how the same level of very significant damage on large industrial lands can be catastrophic to those of us with smaller tracts of land - 5% damage on larger ownerships can very quickly result in 60%-90% damage to smaller owners as is the case on my Oakville property. Those of us with smaller acreages in "hot spots" can't absorb more than few nights of damage so must be more proactive. Even if small forest landowners "lethally remove" a few bears that didn't actually "peel", the total depredation
Black bear tree depredation P.42

Objective 23: Reduce number of permits requested to lethally remove black bears for timber damage over the period 2015-2021.

This objective does not address the concern landowners have with financial loss due to state-managed wildlife on their private property. The objective would be more appropriate if it was restated to say Reduce number of complaints of black bears causing timber damage over the period 2015-2021. And then go on to identify strategies exactly how this will be accomplished. If a bear population is healthy and can sustain limited removal of specific bears causing damage, then landowners should be allowed to ask that bears be removed. The WDFW issues deer and elk kill permits for damage to agricultural lands, why not also do the same for bears? If the option to remove bears is reduced or removed, then the WDFW may need to compensate landowners for loss to their commercial crop as is done for elk damage. While one strategy is to identify additional recreational opportunities for harvest, specific offering bears may not be removed by boot hunters. Hunter success may not be all that good in areas experiencing damage so recreational harvest may not be effective. On private lands, timber harvest excise tax revenue in 2013 was roughly $35 million. If bear depredation reduces potential revenue for landowners then excise tax collections may be less, affecting all residents. Killing surplus bears at minimal cost to WDFW should continue as a reasonable approach to managing this specific conflict, as it is done for other species that cause commercial crop damage.

Objective 23: Reduce the number of permits requested to lethally remove black bears for timber damage over the period 2015-2021. We have grave concerns with the language contained in this section. This objective is poorly worded and misguided and does not address concerns landowners have with significant financial loss due to state-managed wildlife on their private property. Bear damage to commercial timberlandowners is no less of an economic issue than damage caused by deer and elk on farmland/orchards or to livestock producers from wolf and cougar predation. The language should be changed to “Reduce the number of complaints of black bears causing timber damage over the period 2015-2021.” Additionally, within the strategies we note that for damage caused by deer and elk in agricultural settings (page 40) and for carnivore depredation on livestock (page 41) that strong language exists reflecting the use of agency kill authority, as it should. Similar language does not exist under the strategies for black bear damage, strategy f. as listed should be changed to read “Utilize agency kill authority and depredation permits for landowners experiencing timber damage”. This will provide that the same level of response is being used to deal with any wildlife related economic damage. We are concerned with strategy g. as it appears to seek to change the currently preferred method of addressing bear damage from hunting opportunities. Is this consideration for recreational bear hunting? Hounds are a valuable and effective tool that should not be minimized, the permits provided have bears which likely deters damage and don’t always result in harvest as bears can escape. The wording in strategy g. should spell out what other lethal methods are being considered as they may be considered less ethical by the public (e.g. foot snares) or this strategy should be eliminated.

The language between how damage will be dealt with for commercial timberland owners versus general agricultural and livestock producers should be consistent. The language for commercial timberland damage as currently written does not appear to warrant being reduced. Black bear populations appear to be healthy in Washington as described on pages 97-100. Additionally, recreational hunting seasons in 2015 allow hunters to kill 2 bears in western Washington (where bear damage is most pronounced), reflecting healthy bear numbers and liberal hunting opportunity. This information does not seem to indicate that damage hunts are having any impact on bear populations or raise any concerns that damage hunts need to be minimized. The Washington Forest Protection Association (WFPA) reports that only 143-186 bears have been taken from damage hunts annually over the past 5 years and this harvest is spread out over a vast landscape. In comparison 134 damage permits alone were issued for elk and deer in the Skagit and ACME Valleys in 2013 alone, which represents a smaller, localized area in western Washington. The only evidence existing which suggests why bear depredation language in the Draft GMP were worded differently than for other species associated with economic damage is the 2014 General Public Opinion Survey. This survey indicated that 79% of the public was opposed to killing bears damaging commercial timberland. It is interesting to note that citizen opinion wasn’t solicited for damage permits being provided for deer and elk depredation on agricultural lands. Public opinion on these hunts would likely have shown similar opposition to killing ungulates to protect crops. We question why only black bears were targeted for public opinion, when the number of bears killed from damage hunts is very low and bear populations are consistent with liberal hunting opportunities. The timber harvest excise tax revenue in 2013 was approximately $35 million to the State of Washington. If bear depredation issues are not addressed, excise tax collections may be less affecting all residents. As bear populations are healthy, the number of animals removed lethally is small, and the costs for lethal removal fall on the commercial landowners, the currently employed strategy (not as outlined in the Draft GMP) provides low costs to WDFW and should be maintained as a reasonable approach to managing this issue.

Thank you for your participation. Using bait and hounds to hunt black bears was banned by voter initiative. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. Some actions may include better utilization of hunters with bear tags. One of the issues of spring bear seasons is orphning bear cubs. Therefore, WDFW tends to provide spring bear seasons when there is a clear management objective that spring seasons are ideal for addressing nuisance bear activity. To minimize cub orphning the department requires specialized hunter training and often limits the hunt areas to specific areas.

Definitely!

Do not agree this is a problem and I have seen it first hand.

Thank you for your participation. WDFW does not dispute that tree damage is occurring. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.

Thank you for your perspective. Our intent here is to better quantify and address timber damage. Removing bears has become routine, yet we don’t know if it has addressed the level of damage.

Does this not work?

Thank you for your question. The intent of this objective is to improve and broaden the existing program so that the need for damage permits is reduced.

“Isn’t issue permits in any area that has a permit fee access, this should include any area that has fee access for any type of hunting at any time of the year. How can there be bear damage when the landowner is charging and access fee? They obviously want the bears there for the hunters or they

Thank you for your comment.
During the spring, when black bears are emerging from dens, high nutritional value food resources are limited. Bears will often seek sapwood as a preferred food resource because of its high sugar content. Trees with high growth rates, typically found on commercial timberlands, contain the highest sugar content and therefore are the most vulnerable to depredation. Damage to commercial timberlands can, at times, exceed one third of the trees in a given stand, resulting in economic losses for landowners (Washington Department of Fish and Wildlife 2008). We agree.

Especially if a timber company landowner is charging for public hunting access

Force timber companies to allow free access for any black bear removal

Given the changing times in the timber industry, I don’t know enough now to comment.

Here is an idea; open a state wide spring bear season, not by special permit. This will increase revenue and if the timber companies want animals off the land then they can buy permit and have their own employees go hunting. Limiting the effective area these hunts can occur lead to private timber companies making thousands of dollars of additional revenue. And the state promotes this.

How you going to do this?

I agree here. If the timber companies are wanting this why lock out the hunters or make them pay for access?

I am a bit shocked that there are permits to lethally remove black bears. Reducing the number of permits and more fully evaluating the necessity in each situation is an important objective.

I’d like to see permits for timber damage drastically reduced and hunters who buy bear tags given the opportunity to harvest more bears in some of these areas. I don’t see any reason why nearly every GMU in the state doesn’t have some spring bear permits, even if it’s only five or ten it would be better than nothing. And success rates are usually very low anyway, so in most cases the harvest would be insignificant. But it would at least provide more opportunity to hunters who support the WDFW by purchasing licenses and tags.

If timber companies want charge for access, then make them pay for damage permits.

Increase black bear bag limits in that area

Isn’t it the humans who do way more timber damage than bears? Why are bears killed for this? Yes, reduce the permits to zero so bears aren’t killed for timber damage. What a waste of tax payer money.

I support this. Landowners need to realize that wildlife utilization of their land is part of the cost of doing business, you should not be letting them overkill many of the other “problem” species either--peregrines, mountain beaver, etc.

I would like to comment on objective 24. During the course of my career I have had the privilege of being involved with private forest land management in nearly all of the counties in Western Washington for over 30 years. In that time I have watched the black bear problem go from one that was under control in the early 1980’s to one of increasing severity over the last two decades. The policy set forth by WDFW relies on heavily using sport hunters as a means of controlling black bear damage to young stands of timber.

I have used all different methods to control black bear damage including but not limited to; bear feeding stations, hound hunting, sport hunting, and snaring. Of all the methods used to control the damage caused by bears sport hunting is the least effective. The problem bears are seldom eradicated. If the bears are causing nuisance problems around homes sport hunters can be effective. However, when the problem is bears that are stripping trees in the early summer, when sport hunters are not allowed to hunt them, they seldom get the offending bears. Sport hunters and hound hunters are both after larger bears. Especially when the number of bear permitted for taking is so limited. They will often times pass up smaller bears in favor of larger ones. Feeding stations can be effective but their success can be limited also when the some of the bears are unable to access the stations due to competition. Bears denied access to the stations will attack trees to get the sugars they are craving. Snares are very effective in pin pointing the offending bears. Many times the bears doing the most damage are not the larger bears. They can be very young bears that are too small to be attractive to hunters. It is critical to eliminate the problem bears and not just a set number of bears.

I urge the department to reconsider putting too much emphasis upon “politically popular” approaches to control bear damage. Sport hunting is a tool that can help overall population levels,
<table>
<thead>
<tr>
<th>Suggestion</th>
<th>Comment</th>
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<tbody>
<tr>
<td>Leave the Black Bears alone. Timber companies must leave more habitat if they don't want bear damage. They have to eat something. Timber damage is a result of excessive human damage. Educate, don't decimate.</td>
<td>Thank you for your comment. WDFW is mandated by state law to assist landowners with mitigating wildlife conflict, which includes damage to timberlands caused by bears. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.</td>
</tr>
<tr>
<td>Let the public hunt these animals. The current method of &quot;professional&quot; hunters is unfair and inhumane.</td>
<td>Thank you for your comment. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. Some actions may include better utilization of hunters with bear tags.</td>
</tr>
<tr>
<td>Let's stop lethally removing black bears for timber damage, period. No permits for lethally removing black bears should be the objective.</td>
<td>Thank you for your comment. WDFW is mandated by state law to assist landowners with mitigating wildlife conflict, which includes damage to timberlands caused by bears. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. WDFW strongly believes conflict management programs that utilize a variety of methods are the most successful at mitigating and minimizing wildlife conflict problems.</td>
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<tr>
<td>No more loss of hunting access.</td>
<td>Thank you for your participation. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.</td>
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<tr>
<td>No permits, encourage seasonal hunting access.</td>
<td>Thank you for your participation. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.</td>
</tr>
<tr>
<td>No the numbers are up and keep going up</td>
<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>No what you need to do is allow hunters to use hounds for hunting. The problem is most hunters never even see a bear out in the field. We need some kind of advantage. We can't bait and we can't use hounds, no matter how use slice it we cant harvest enough bears and cougars to even come close to helping the problem.</td>
<td>Thank you for your comment. The use of bait or hounds to hunt bears during the general season was banned by voter initiative. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. Some actions may include better utilization of hunters during different periods of time and other proactive measures.</td>
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<tr>
<td>No, not necessarily. You need to have a program that addressed needs as they come up. In general, I prefer to see sport seasons used to control damage. In some areas, you need to examine the trends following spring bear seasons -- when harvest goes from 50% success to 27 to 17 to 8 to 4%, I am guessing you have been hammering the bears. In those areas, you do not need damage hunts on top of everything else -- especially where timber owners are charging for access. Charging a spring bear hunter for access is ridiculous.</td>
<td>Thank you for your comment. Currently, landowners who receive damage permits are required to allow some level of hunting access. WDFW is actively working with landowners to enhance hunter access during specified periods of time in areas where hunter participation may assist in mitigating and preventing damage.</td>
</tr>
<tr>
<td>No, Increase permits. Timber owners can have tremendous losses from a just few random animals.</td>
<td>Thank you for your participation. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.</td>
</tr>
<tr>
<td>Only if the number of black bears causing damage is reduced. Otherwise why would we?</td>
<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>Open up a general spring bear season or bring back hound &amp; baiting</td>
<td>Thank you for your comment. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.</td>
</tr>
<tr>
<td>Or allow hounds, baiting.</td>
<td>Thank you for your comment. The use of bait or hounds to hunt bears during the general season was banned by voter initiative.</td>
</tr>
<tr>
<td>Really?????</td>
<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>Reduce permits to lethally remove black bears from forests.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>REDUCE the number of permits period...not just requests. The way this objective is worded...one could reasonably assume the dept would seek to destroy these animals instead of protecting THEM.</td>
<td>Thank you for your comment. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.</td>
</tr>
<tr>
<td>&quot;Reduce&quot; is nebulous. You could reduce by one and say the objective is met. Step up to the plate and give a specific goal. Reduce by 5 a year for the time period is a specific goal. Challenge yourself!!!</td>
<td>Thank you for your perspective. This objective has been modified based on recommendations received through the Game Management Plan commenting process.</td>
</tr>
<tr>
<td>The department needs to shine a light on this hidden and counterproductive practice by advertising how many bears are wasted in the name of timber damage. Absolutely no bear damage permits should be issued, or spring bear seasons set, on land that charges or prohibits state licensed hunters during bear season. Companies can earn damage permits with free public access, but not without.</td>
<td>Thank you for your participation. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. Currently, bears harvested through this program are the property of the State. Therefore, bear hides and gall bladders are returned to WDFW and harvested meat is professionally processed and donated.</td>
</tr>
</tbody>
</table>
The Makah Tribe owns commercial timberlands in the status off the Reservation and has grave
concerns with the language contained in this section. This objective is poorly worded
and misguided and does not address concerns landowners have with significant financial loss due
to state-managed wildlife on their private property. Bear damage to commercial timberland owners
is no less of an economic issue than damage caused by deer and elk on farmland orchers or
to livestock producers from wolf and cougar predation. The language should be changed to “Reduce
the number of complaints of black bears causing timber damage over the period 2015-
2021”. Additionally, within the strategies we note that for damage caused by deer and elk in
agricultural settings (page 40) and for carnivore depredation on livestock (page 41) that strong
language exists reflecting the use of agency kill authority, as it should. Similar language does not
exist under the strategies for black bear damage, strategy f. as listed should be changed to read
“Utilize agency kill authority and depredation permits for landowners experiencing timber
damage”⁰. This will provide that the same level of response is being used to deal with any wildlife
related economic damage. We are concerned with strategy g. as it appears to seek to change the
currently preferred method of addressing bear damage from hound hunting. Hounds are a
valuable and effective tool that should not be minimized, the permits provided haze bears which
likely deters damage and don’t always result in harvest as bears can escape. The wording in
strategy g. should spell out what other lethal methods are being considered as they may be
considered less ethical by the public (e.g. foot snares) or this strategy should be eliminated.

The language between how damage will be dealt with for commercial timberland owners versus
general agricultural and livestock producers should be consistent. The language for commercial
timberland damage as currently written does not appear to be warranted. Black bear populations
appear to be healthy in Washington as described on pages 97-100. Additionally, recreational
hunting seasons in 2014 allow hunters to kill 2 bears in western Washington (where bear damage
is most pronounced), reflecting healthy bear numbers and liberal hunting opportunity. This
information does not seem to indicate that damage hunts are having any impact on bear
populations or raise any concerns that damage hunts need to be minimized. The Washington
Forest Protection Association (WFPA) reports that only 143-186 bears have been taken from
damage hunts annually over the past 5 years and this harvest is spread out over a vast landscape.
In comparison 134 damage permits alone were issued for elk and deer in the Skagit and ACME
Valley in 2013 alone, which represents a smaller, localized area in western Washington. The
only evidence existing that suggests why bear depredation language in the draft GMP were
wasted differently than for other species associated with economic damage is the 2014 General
Public Opinion Survey. This survey indicated that 70% of the public was opposed to killing bears
damaging commercial timberland. It is interesting to note that citizen opinion wasn’t solicited for
damage permits being provided for deer and elk depredation on agricultural lands. Public opinion
on these hunts would likely have shown similar opposition to killing ungulates to protect crops.
We question why only black bears were targeted for public opinion, when the number of bears
killed for damage hunts is very low and bear populations are consistent with liberal hunting
opportunities. The timber harvest excise tax revenue in 2013 was approximately $35 million to
the State of Washington. If bear depredation issues are not addressed, excise tax collections may be
less affecting all residents. As bear populations are healthy, the number of animals removed
lethally is small, and the costs for lethal removal fall on the commercial landowners, the currently
employed strategy (not as outlined in the Draft GMP) provides low costs to WDFW and should be
maintained as a reasonable approach to managing this issue.

The permits should be given to hunters to harvest so there isn’t wastage of game.

This is good, too.

This is long overdue. Why does the dept. catter to these timber companies that are denying access to
timber lands for hunting? Let the bears eat their trees until they want hunters again.

This is totally supported.

This objective does not address the concern landowners have with financial loss due to state-
managed wildlife on their private property. The objective would be more appropriate if it was
restated to say Reduce number of complaints of black bears causing timber damage over the
period 2015-2021. And then go on to identify strategies exactly how this will be
accomplished. If a bear population is healthy and can sustain limited removal of specific bears
causing damage, then landowners should be allowed to ask that bears be removed. The
WDWF issues deer and elk kill permits for damage to agricultural lands, why not also do the
same for bears? If the option to remove bears is reduced or removed, then the WDFW may
need to compensate landowners for loss to their commercial crop as is done for elk damage.
While one strategy is to identify additional recreational opportunities for harvest, specific
offending bears may not be removed by boot hunters. Hunter success may not be all that good in areas experiencing
damage so recreational harvest may not be effective. On private lands, timber harvest excise tax revenue in 2013 was roughly $35 million. If bear depredation reduces potential revenue for
landowners then excise tax collections may be less, affecting all residents. Killing surplus bears
at minimal cost to WDFW should continue as a reasonable approach to managing this specific
conflict, as it is done for other species that cause commercial crop damage.

This represents a complete reversal of proper priorities.

This should not be done. I have been involved with depredation hunts on private forest land for
over 30 years and it has been the most successful tool in reducing bear damage to forest
plantations. We use all tools as well including feeding and allowing the public opportunities to
hunt. The feeding effects the process of reducing damage because it is supplemented with
depredation hunts. The public do not take enough animals to reduce the damage, most years on
our land no bears are taken by boot hunters.

Thank you for your comments. This objective has been modified based on
recommendations received through the Game Management Plan commenting process.

Thank you for your perspective.

This should be balanced the number of bears annually.

Thank you for your participation. Data collected from conflict management actions is
included in population management analyses.

Timber damage? Somebody got bear fur in their Stihl? Reduce these permits to zero.

Timber companies can always allow hunters, WITHOUT CHARGING THEM, to help keep the
number of bears and damage down

Thank you for your comments. The intent of this objective is to improve the existing
program so that the need for damage permits is reduced. WDFW strongly believes
conflict management programs that utilize a variety of methods are the most successful at mitigating and
minimizing wildlife conflict problems.

Thank you for your comment.

Tough one to solve. Some times even when feeding pellets trees still getting peeled. Need to
increase harvest in these areas to combat it.

Thank you for your perspective. WDFW is actively working with landowners to enhance
hunter access during specified periods of time in areas where hunter participation may assist in mitigating and preventing damage.
This objective is poorly worded and misguided and does not address concerns landowners have with significant financial loss due to state-managed wildlife on their private property. Bear damage to commercial timberlandowners is no less of an economic issue than damage caused by deer and elk to farmland and orchards or to livestock producers from wolf and cougar predation. The language should be changed to "Reduce the number of complaints of black bears causing timber damage over the period 2015-2021". Additionally, within the strategies we note that for damage caused by deer and elk in agricultural settings (page 40) and for carnivore depredation on livestock (page 41) that strong language exists reflecting the use of agency kill authority, as it should. Similar language does not exist under the strategies for black bear damage. This objective will also have a negative effect on the dollars produced for schools on lands managed by DNR.

Strategy (page 42) Facilitate the black bear timber depredation program (including applications, permits, and actions) to improve WDFW's response to landowners experiencing timber damage. Should be changed to read "Utilize agency kill authority and depredation permits for landowners experiencing timber damage": This will provide the same level of response that is being used to deal with any wildlife related economic damage. Strategy (g) (page 42) Evaluate the potential to use a variety of methods for lethally removing black bears to address timber damage. We are concerned with this strategy as it appears to seek to change the currently preferred method of addressing bear damage from hound hunting. Hounds are a valuable and effective tool that should not be minimized, the permits provided hase bears which likely deters damage and don't always result in harvest as bears can escape. The wording in strategy g should spell out what other lethal methods are being considered as they may be considered less ethical by the public (e.g. foot snares) or this strategy should be eliminated.

General Comments: The language between how damage will be dealt with for commercial timberland owners versus general agricultural and livestock producers should be consistent. The language for commercial timberland damage as currently written does not appear to be warranted. Black bear populations appear to be healthy in Washington as described on pages 97-100. Additionally, recreational hunting seasons in 2014 allow hunters to kill2 bears in western Washington (where bear damage is most pronounced), reflecting healthy bear numbers and high hunting opportunity. This information does not seem to indicate that damage hunts are having any impact on bear populations or raise any concerns that damage hunts need to be minimized. The Washington Forest Protection Association reports that only 158-180 bears have been taken from damage hunts annually and this trend is spread out over a vast landscape. In comparison 143 damage permits alone were issued for elk and deer in the Skagit and ACME valleys in 2013 alone, which represents a smaller, localized area in western Washington. The only evidence existing that suggests why bear depredation language in the draft GMP were worded differently than for other species associated with economic damage is the 2014 Public Opinion Survey. If public opinion is to be used this survey indicated that 70% of the public was opposed to killing bears damaging commercial timberland. It is interesting to note that citizen opinion wasn't solicited for damage permits being provided for all hounds depredation on agricultural lands. Public opinion on these hunts would likely have shown similar opposition to killing ungulates to protect crops. We question why only black bears were targeted for public opinion and are now being managed by public opinion, when the number of bears killed from damage hunts is very low and bear populations are consistent with liberal hunting opportunities.

There should be no damage permits. Completely remove all damage permits for timber companies. They can either open their lands back up to hunters (and I don't mean walk in only)" buy the price". These are OUR bear the peoples of WA state, not timber company bear. With all their lands and resources there are no other resources to protect crops. We question why only black bears were targeted for public opinion and are now being managed by public opinion, when the number of bears killed from damage hunts is very low and bear populations are consistent with liberal hunting opportunities.

Thank you for your perspective. Currently, landowners who receive damage permits are required to allow some level of hunting access. The intent of this objective is to improve the existing program so that the need for damage permits is reduced. WDFW is actively working with landowners to enhance hunter access during specified periods of time in areas where hunter participation may assist in mitigating and preventing damage.

Why decrease them? Its effective control. Come on!

You should increase the number of permits. Thank you for your perspective. The intent of this objective is to improve the existing program so that the need for damage permits is reduced.
<table>
<thead>
<tr>
<th>Objective 24: Reproduce and/or update existing conflict prevention outreach materials and create 2 new conflict prevention publications by 2021.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>(22 comments) Support Objective</td>
</tr>
<tr>
<td>(7 comments) Oppose Objective</td>
</tr>
<tr>
<td>(4 comments) Ok</td>
</tr>
<tr>
<td>Evaluate the non-lethal methods of decreasing livestock deprivation that are already in use</td>
</tr>
<tr>
<td>I suggest you increase your education as there are many humane ways ranchers can live with predators, especially the wolves that they hate so much.</td>
</tr>
<tr>
<td>Poorly written objective. What does it mean?</td>
</tr>
<tr>
<td>Update them so they are fair to everyone.</td>
</tr>
<tr>
<td>Who is the target audience?</td>
</tr>
<tr>
<td>Yes - prioritize conflict prevention. Increase fines on those people who do not follow sensible practices that cause conflict in the first place.</td>
</tr>
<tr>
<td>If it makes you feel better - otherwise don't waste our money.</td>
</tr>
<tr>
<td>Use the old ones -- only update where needed or clearly helpful. Preventing conflicts is usually common sense and you need to be strong when dealing with landowners that are not using proper husbandry techniques</td>
</tr>
<tr>
<td>Yes, at least 2.</td>
</tr>
<tr>
<td>Looks pretty good</td>
</tr>
<tr>
<td>It won't make any difference, spend the money on something that will.</td>
</tr>
<tr>
<td>I agree with this objective.</td>
</tr>
<tr>
<td>This shouldn't take 7 years.</td>
</tr>
<tr>
<td>This could be added cost to the dept. This would be better done through the news media.</td>
</tr>
<tr>
<td>No comment</td>
</tr>
<tr>
<td>Simplify</td>
</tr>
<tr>
<td>No, this is a waste of money!</td>
</tr>
<tr>
<td>If publication will help. Less expensive than in-person communication. A 'leave behind' pamphlet is good. Keep messages few.</td>
</tr>
<tr>
<td>or not</td>
</tr>
<tr>
<td>YES BY (g)!!!</td>
</tr>
<tr>
<td>only if needed and just on the net. no use wasting money.</td>
</tr>
<tr>
<td>Disagree. This is too much study with little results.</td>
</tr>
<tr>
<td>not sure there is any success here.</td>
</tr>
<tr>
<td>Yes, this is very much needed.</td>
</tr>
<tr>
<td>agree</td>
</tr>
<tr>
<td>I agree with this objective.</td>
</tr>
<tr>
<td>good</td>
</tr>
<tr>
<td>Agree, it helps a little</td>
</tr>
<tr>
<td>No Comment</td>
</tr>
<tr>
<td>People need to use common sense in what they do and where they go and where they build. Every time you make a new plan or take time to update an older one you waste more money and time. You can create new materials every day but if you don't have common sense and you don't read the material then what is the point.</td>
</tr>
<tr>
<td>Very easily accomplished.</td>
</tr>
<tr>
<td>Who knows cut wolves now to stop need for future expenditures.</td>
</tr>
<tr>
<td>Only 2</td>
</tr>
<tr>
<td>YES</td>
</tr>
<tr>
<td>Waste of tax payer money, use only the website</td>
</tr>
<tr>
<td>Use social media, save the trees</td>
</tr>
<tr>
<td>I don't know if there is a conflict prevention publication for gray wolves, but there should be, and perhaps it should be provided for free to any ranchers with wolves in the area.</td>
</tr>
<tr>
<td>Is this really necessary?</td>
</tr>
<tr>
<td>Urbanites should have access to conflict prevention material and be reminded that they have moved into the home range of wild animals by choice.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective 25: Develop a standardized data collection system for recording complaints and lethal removal of game and fur bearer species; searchable by species, location, and resolution.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>(39 comments) Support Objective</td>
</tr>
<tr>
<td>(5 comments) Oppose Objective</td>
</tr>
<tr>
<td>(4 comments) Ok</td>
</tr>
</tbody>
</table>
Objective 26: Conduct a randomized survey of complainants who filed deer, elk, bear, cougar, and wolf complaints to determine the level of satisfaction with WDFW actions for resolving their wildlife conflict complaint during the period 2015-2021.

WDFW RESPONSE

This objective has been modified based on recommendations provided through the Game Management Plan commenting process. Conduct a survey of complainants who filed deer, elk, bear, cougar, and wolf complaints to determine the level of satisfaction with WDFW actions for resolving their wildlife conflict complaint during the period 2015-2021.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>(25 comments) Support Objective</td>
</tr>
<tr>
<td>(17 comments) Oppose Objective</td>
</tr>
<tr>
<td>(3 comments) OK</td>
</tr>
</tbody>
</table>

Thank you for your support. Your comments are important to us.

Thank you for your participation. Your comments are important to us.

Thank you for your comment.
Conduct a randomized survey of complainants who filed deer, elk, bear, and cougar complaints... as understood, it concerns data collection for conflicts between humans and game species. However, human/wolf conflict is currently covered in the Washington Wolf Conservation and Management Plan, and therefore, the inclusion of wolves here is unnecessary.

Therefore, Objective 26 should be modified to eliminate mention of wolves, so that it reads “Conduct a randomized survey of complainants who filed deer, elk, bear, and cougar complaints...”

(51 Comments) Delete “wolves” in Objective 26 from the “Wildlife Conflict” section, on p. 4, regarding a reporting system for complaints about hunted game species. Wolves are not a hunted game species; they are a state endangered species. The Management Plan already includes strategies for addressing any wolf-related conflicts.

Thank you for your comments. Inclusion of wolves in WDFW’s survey and SEIS for its Game Management Plan is simply inappropriate.

(2 Comments) Delete “wolves” in Objective 26 from the “Wildlife Conflict” section, on p. 4, regarding a reporting system for complaints about hunted game species. Wolves are not a hunted game species; they are a state endangered species and should be treated accordingly. The Washington Wolf Conservation and Management Plan already includes strategies for addressing any wolf-related conflicts. The inclusion of wolves in WDFW’s survey and SEIS for its Game Management Plan is simply inappropriate.

Thank you for your comments. Unfortunately, conflict issues with wolves do occur even during recovery of wolf populations. WDFW is actively involved in mitigating conflict issues with wolves. Much effort is spent on assisting landowners with non-lethal measures to minimize conflicts.

As well as the satisfaction of the public in general.

Thank you for your comment.

Delete “wolf”.

Thank you for your comment.

Good idea.

Thank you for your support.

How will these wildlife complaints be resolved in the case of wolves?

Thank you for your question. This objective is not intended to create resolution actions but rather to assess the level of complainant satisfaction with the actions taken by WDFW. Many of the strategies for action are mentioned in the other objectives of the Game Management Plan.

No. It should be automatic that anyone who files a complaint should have to provide a survey or their complaint goes to file 13.

Thank you for your comment. Complainants would not be required to provide a response to surveys and the survey has no relevance to the extent of response provided by WDFW.

Remove the private livestock owners from our public land

Thank you for your perspective. The removal of private livestock owners from public lands is not under the purview of WDFW or the Game Management Plan.

Satisfaction will only come if owners are compensated fairly for any loss of domestic stock caused by wildlife species.

Thank you for your comment.

This implies that the complainants who are generously given a permits to kill wildlife to “solve their problem” will be giving WDFW high marks. WDFW needs to focus on reducing and eliminating permits to kill wildlife.

Thank you for your perspective. The spectrum of WDFW’s response to wildlife conflict complaints is broad and diverse; permits for removing animals is only one component of the management tools WDFW utilizes.

WDFW serves all of Washington’s public not just the squeaky wheels.

Thank you for your comments. WDFW currently collects information from a broad sample of Washington residents through other surveys. However, it is important to receive feedback from those individuals affected by wildlife conflict to better understand if our actions are effective in resolving the conflict issues.

Work to include non-consumptive users – determine their level of satisfaction.

Thank you for your comment. Because both consumptive and non-consumptive user may experience wildlife conflict, the sample of survey respondents is likely to include both user groups.

You are not going to like the results.

Thank you for your comment.

This does not even already??

Thank you for your comment. No, WDFW has not conducted a formal survey to assess this topic.

Statistically – a systemic is just as good and sometimes better than random. I would want to see you look at more than just their satisfaction

Thank you for your comment. The objective has been revised to reflect responses received on the draft Game Management Plan. Additionally, WDFW will consider additional types of information that may be gathered through the survey along with level of satisfaction with WDFW response.

Fine them and make them fix the problem they caused. make them use flaggy, electric fence, etc...

Thank you for your comment. The intent of this objective is to determine the public’s level of satisfaction with WDFW’s effort to resolve the complainant’s wildlife conflict issue.

agree

Thank you for your comment.

Why randomized, send a letter asking each one to comment.

Thank you for your comment.

Contact every complainant. Not just a few. Publish the results publicly, it’s part of transparency which is a big need at WDFW.

Thank you for your comment. The actual survey design is yet to be determined and may include all complainants or a sample of complainants. WDFW strives to provide the public with accurate, up-to-date information.

I agree with this objective.

Thank you for your comment.

True satisfaction is NOT of any import if they use public lands, and do NOT collaborate with protection of the wild species...they have NO room to complain. And if they violate any laws, they should be imprisoned NOT just have a fine levied.

Thank you for your comments. WDFW is mandated to assist landowners with wildlife conflict issues; therefore it is important that our efforts appropriately address the problem and resolve the complaint.

Make it available to other hunters.

Thank you for your comment. WDFW strives to provide the public, including both consumptive and non-consumptive users, with accurate, up-to-date information.

Public plain English

Thank you for your comment.

Worthwhile. Value of a survey will be depend upon quality of same and those hired to execute. I suggest considering who to do the survey and whether in person or other means.

Thank you for your comments. The actual survey design and who will conduct the survey is yet to be determined and may include a variety of methodologies.

Some of this is the landowner responsibility. If their land is closed to hunters, or if they charge, why do they get special damage permits?

Thank you for your comment. Special permits and private lands access are covered under separate objectives within the Game Management Plan.

This should have already been in place.

Thank you for your comment. WDFW has conducted surveys in the past for information regarding specific species or for general views; however information reflecting level of customer satisfaction has been limited.

no resolution here... just more frustration.

Thank you for your comment.

I agree with this objective.

Thank you for your comment.

good

Thank you for your comment.

Don’t worry about weather the landowner is satisfied unless the problem is on his land. You can not continue to encroach upon the wildlife and not expect it to eventually fight back.

Thank you for your comment. WDFW is mandated to assist landowners with wildlife conflict issues; therefore it is important that our efforts appropriately address the problem and resolve the complaint.

Forget random survey. Send everyone that is contacted a survey in the mail. Then actually read them and listen and learn from them knowing you cannot please everyone.

The actual survey design is yet to be determined and may include all complainants or a sample of complainants. The intent of every survey utilized by WDFW is to gain information that can be used to improve our efforts.

Forget wolf-related conflicts.

Thank you for your comment.

Well, when you are a state endangered species and they are charging a fee for WDFW service you can bet the level of satisfaction feel dramatically

Thank you for your comments. Currently WDFW does not charge fees for conflict mitigation efforts put forth by our staff; however, there are fees associated with various damage protection permits and hunting licenses.

Waste of resources. No

Thank you for your comment.

10:41

Thank you for your comment.

same people who won’t allow access

Thank you for your comment.
Sure.

Great topic but keep politics out of discussing wildlife conflicts. The public should be aware of what is going on. They want to get out in the open air but don't have a clue what is out there and what it can do. It's not just as simple as it seems. The public is very concerned about the outcome.

I agree with this objective.

This should be standard operating procedure for all wildlife conflict complaints. The follow up survey should be conducted within one month of originating complaint, with further investigations being conducted if complaint remains unresolved at that point.

If a complaint does not support or engage in hunting as a scientific means of controlling wildlife, they can move. When is it going to be acknowledged that moving to urban areas is encroaching on wildlife? When are developers going to be stopped from encroaching on wild lands? A little common sense will go a long ways here.

Delete “wolves” in Objective 26 from the Wildlife Conflict section. It is inappropriate at this time to address conflict issues involving wolves in the 2015-2021 GMP. Strategies addressing wolf-related conflicts are discussed in the Washington Wolf Conservation and Management Plan, the only plan that should guide the recovery and management of wolves while they are a state listed endangered species in Washington.

Well, when you started charging a fee for WDFW service you can bet the level of satisfaction fell dramatically.

Objective 27: Develop a minimum of two projects to expand, improve, or develop the use of non-lethal harassment, deterrence, or mitigation measures to minimize negative human-wildlife interactions particularly in urban areas, areas where species populations are below management objectives or species are under federal protection during the period 2015-2021.

PUBLIC COMMENT

WDFW RESPONSE

This objective has been modified based on recommendations provided through the Game Management Plan commenting process. Develop a minimum of two projects to expand, improve, or develop the use of non-lethal harassment, deterrence or long-term mitigation measures to minimize negative human-wildlife interactions; particularly in: 1) urban areas, 2) areas where species populations are below management objectives, or 3) areas where species are under federal protection during the period 2015-2021.

- Support Objective
- Oppose Objective
- OK
- A-firmative
- A-great idea
- Good idea
- Good at these objectives seem to be reiterations of other objectives.
- Thank you for your support. Your comments are important to us.
- Thank you for your participation. Your comments are important to us.
- Thank you for your comment.
- Thank you for your comment.
- Thank you for your comment. This objective allows for inclusion of projects that may involve wolves as well as other species.
- Thank you for your comment. WDFW has used volunteers to assist with various projects in the past and would continue to do so. Through this objective, as well as objectives 22 and 28, WDFW will promote collaboration with local governments and others to provide improved service and response for conflict management.
- Thank you for your comments.
- Thank you for your comment.
- Thank you for your comment. This objective has been modified based on recommendations provided through the Game Management Plan commenting process.
- Thank you for your comment.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments. WDFW currently utilizes a variety of permits to abate nuisance activities.
- Thank you for your comments. WDFW currently utilizes a variety of permits to abate nuisance activities.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
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- Thank you for your comments.
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- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
- Thank you for your comments.
ensures their viability but is in balance with prey across the landscape. Funding needs and new conflict prevention and mitigation techniques (page 44).

We question the need and the outcome of these projects especially when conducted by a "pro" carnivore biologist. Strategies:

a. Identify, explore, and test the use of new non-lethal deterrent measures for wildlife conflict issues, e.g., using dogs to move turkeys from an urban area (page 44).

b. Provide opportunities for volunteers to assist in wildlife conflict resolution activities (page 44). Landowners must be consulted first and asked if they want volunteers on their private property.

c. Support collaborative research opportunities that test, assess, and evaluate existing and new conflict prevention and mitigation techniques (page 44).

While remembering the mandates of managing predator populations at a level that ensures their viability but is in balance with prey across the landscape. Funding needs to be available to assess prey populations first.

g. Develop new options for providing compensation to landowners outside of annual cash payments (page 44).

Cash compensation must be available to those that suffer losses.

Objective 28: Expand and improve the existing wildlife control operator program to ensure statewide coverage in each county and include comprehensive training and accountability.

WDFW RESPONSE

PUBLIC COMMENT

I think that the urban areas need to enjoy wildlife as much as we are forced to live with them because you expect us to...

Thank you for your comment. This objective is not limited to urban areas, the intent of the objective is to place emphasis on three separate scenarios: 1) urban areas, 2) areas where species populations are below management objectives, or 3) species under federal protection. The objective has been rewritten to make the distinction more clearly understood by the reader.

You are a state agency... work within the state to change zoning laws for wild lands. ...

Thank you for your comment.

We question the need and the outcome of these projects especially when conducted by a "pro" carnivore biologist.

Thank you for your support, we agree with many of your comments.

I think that the mandate of managing predator populations at a level that ensures their viability but is in balance with prey across the landscape. Funding needs to be available to assess prey populations first.

Thank you for your support. Your comments are important to us.

I disagree with this objective. As a result, we have declined in both areas which is a lose-lose for the agency, public and wildlife.

Thank you for your comment. What I find as a flaw is that funding for this needs to be found. WDFW chose to remove some of this responsibility from Enforcement Division along with that funding to the objective is to place emphasis on three separate scenarios: 1) urban areas, 2) areas where species populations are below management objectives, or 3) species under federal protection. The objective has been rewritten to make the distinction more clearly understood by the reader.

We question the need and the outcome of these projects especially when conducted by a "pro" carnivore biologist.

Thank you for your support. Your comments are important to us.

We question the need and the outcome of these projects especially when conducted by a "pro" carnivore biologist.

Thank you for your support. Your comments are important to us.

I disagree with this objective. As a result, we have declined in both areas which is a lose-lose for the agency, public and wildlife.

Thank you for your comment. This objective is not limited to urban areas, the intent of the objective is to place emphasis on three separate scenarios: 1) urban areas, 2) areas where species populations are below management objectives, or 3) species under federal protection. The objective has been rewritten to make the distinction more clearly understood by the reader.

We question the need and the outcome of these projects especially when conducted by a "pro" carnivore biologist.

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We question the need and the outcome of these projects especially when conducted by a "pro" carnivore biologist.

Thank you for your support. Your comments are important to us.
Agree they need revision. Are you planning to include waterfowl damage complaints?  

Standardized but not the value. 

Disagree  yes, and be sure that those "ranchers" get 

reduce the compensation programs. It is a cost of doing business, not a taxpayer expense 

No, let them shoot the animals. 

...and response time of payments. 

in a herd, culling weaker animals out of the open grazing program. 

To what end? 

Compensation should not take place if the person making the claim has not let the state scientist 

I agree with this objective. 

Make it meaningful and at market value. 

I would rather see compensation come from Dept of Agriculture since they regulate food 

production. I would rather see Fish and Wildlife be able to spend their budget in protecting wildlife and helping people understand the benefits of vibrant, diverse wildlife populations. 

If this means finally including those of us (forestand) in the state most effected by animal damage I'm all for this objective. Our known annual losses are easily in the hundreds of thousands of $/year and likely in the millions if we had accurate ways to measure. The big difference between tree farming and other (good but less criterion beneficial) farm/ranch practices is that one nights bear damage affects our crop for 30-50 years (not just current year loss) - there is no way to undo the bought footage loss on damaged tree's or fill-in the holes left in our forest until the next rotation - one nights loss due to bear damage compounds to huge $ over the 30-50 year rotation. I suspect this objective is more likely intended toward more proactive win-win (WDFW & Landowner) efforts to avoid losses that would be considered for the current compensation programs (see comments on Objective 23) - if so, can these proactive win-win efforts envisioned be applied to forestland owners in "hotspots" disparate for some sort of help.  

Increase compensation for ranchers who utilize non-lethal methods to protect livestock. No compensation or permits should be given out to ranchers who do not use non-lethal methods. 

Revise should be changed to "increase." 

Yes and make sure the loss claims are valid. 

See comment to objectives 15, 19 & 20. 

...and response time of payments. 

I agree with this objective. 

Compensation should not take place if the person making the claim has not let the state scientist verify the cause of the loss. 

To what end? 

Aren't there practices that farmers can implement to minimize these losses to begin with? Like actively moving/ herding their animals daily vs open grazing where they aimlessly mill around not as a herd, culling weaker animals out of the open grazing program. 

I suppose. I know nothing about current programs. Markets change, so too the value of loss. 

"A" 

Again if the land isn't open to hunting No compensation. 

Yes, and be sure that those "ranchers" get about what they pay for the use of each acre they use, per year, to cover their loss. 

Disagree  to be fair there is not always the same value of a resource in one area or the next. The process can be standardized but not the value. 

Agree they need revision. Are you planning to include waterfowl damage complaints?
River elk herds. Legal hunting for antlerless elk has not occurred in the White or Green River drainages that can be cited. We will consider editing this statement in the next draft of the plan.

Yes, if land owners do not allow any hunting even if it is permit only they should not be offered any compensation or at least a reduced compensation.

Yes, We farmers need this. Increase bag limits.

No more compensation for welfare ranches.

Sounds like administrative pork. Empower the land owner.

Farmers/ranchers/etc. that are unwilling to take the steps to minimize predator conflict and/or do not allow verification of what cause the animal's death should not be eligible for reimbursement for livestock or other losses.

As mandated by the Washington State Legislature (RCW 77.04.012), "...the department shall preserve, protect, perpetuate, and manage the wildlife..." the department shall conserve the wildlife... in a manner that does not impair the resource... "...and The commission shall attempt to maximize the public recreational... hunting opportunities of all citizens, including juvenile, disabled, and senior citizens." We suggest that the WDFW always consider these requirements when proposing objectives throughout the document.

In Washington, elk are hunted from August through December with some special permit hunts to address agricultural damage taking place as late as March.

Permits are issued throughout the year. This statement needs to be changed to reflect what is actually occurring with elk harvest. This excerpt is taken from the June 2, 2014 Wildlife Program Weekly Activity Reports:

"Wildlife Conflict Specialist Hand monitored harvest of DPP permits in Elk Area 3721. Another strong week of bull elk harvest was reported with 4 spikes, one 5x5 and one 4x5. Total harvest for the summer/bull season is 18 bull elk."

As the new elk plans are finalized and the existing plans are revised, all will have a common objective relating to attempting to maximize the public recreational game fishing and hunting opportunities of all citizens, including juvenile, disabled, and senior citizens (RCW 77.04.012). To maximize the opportunity would require managing those additive mortality factors negatively affecting the elk herd that compete with hunting, if those mortality factors are not negatively affected by management actions. It says right here to attempt to maximize hunting, and the best way than to achieve this is with modest, but not excessive predator numbers.

The Washington Fish and Wildlife Commission shall attempt to maximize the public recreational game fishing and hunting opportunities of all citizens, including juvenile, disabled, and senior citizens (RCW 77.04.012).

To maximize the opportunity would require managing those additive mortality factors negatively affecting the elk herd that compete with hunting, if those mortality factors are not negatively affected by management actions. It says right here to attempt to maximize hunting, and the best way than to achieve this is with modest, but not excessive predator numbers.

Background

Again we note the need to consistently apply (RCW 77.04.012) and agree this should be the driving factor influencing management. This would indicate the need to manage all additive factors negatively effecting elk herds, including predation. We believe predator populations managed at modest densities would help achieve this objective.

Herd-wide estimates or indices for the North Rainier, South Rainier, and Olympic herds have not been practical for a number of years.

There is a lot more being done in the North and South Rainier herds than is mentioned here, although much of it is tribal. There are also joint fall elk surveys conducted in Mount Rainier National Park, http://change.nature.org/en-us/our-work/nparks/more-elk-that-are-not-mentioned-here. The Muckleshoot Tribe conducts annual aerial surveys of elk in GMUs 485 and 653 and generates herd estimates based on radio-marked animals. The GMU 485 surveys are cooperative among Muckleshoot, Tacoma Water, and WDFW.

We will consider editing this statement in the next draft of the plan.
### Strategies

We have noticed that predation is not cited anywhere as at least a potential limiting factor for any of the herds covered by specific plans. We agree in areas where herds are large and at or near objectives or have significant habitat deficiencies (Mount St. Helens) that predation is unlikely to be a significant factor. However, we have serious doubts that sufficient information exists for smaller herds, particularly ones subjected to increased predatory pressure from wolves. We note that the Selkirk Elk Herd Plan did not have predicted population estimates in the past and is still lacking today. It would seem this should have been a priority when wolves began colonizing Washington, particularly as the lessons learned from the Rocky Mountain wolf recovery found that elk populations in some instances declined significantly. Instead, the assumptions provided for factors limiting the population are habitat and damage removals. Without data on elk population size or trend (other than harvest success) there is no way to assess the validity of these statements. The Muckleshoot Tribe provided convincing evidence that cougar predation was the limiting factor on the Green and White River elk herds at the 2009 Western States Elk and Deer Workshop in Spokane, WA. The Makah Tribe conducted calf survival research over 2 years 2010-2011 and found cougar predation (76% of all mortalities) to be the number one factor limiting calf recruitment. Although we acknowledge that the elk population is not declining, the rate of population growth is low which plays a key role in limiting subsistence and recreational elk harvest. It would seem Commission policy (RCW 77.04.012) would indicate pursuing all potential remedies to improve hunter harvest. While predator management is contentious, it should still be an important management tool that isn’t ignored.

We disagree with the language in the section covering the Olympic Herd Plan. While loss of habitat to human encroachment is an issue, there is a significant amount of habitat managed by the U.S. Forest Service, Washington Department of Natural Resources, and private industrial timberlands that provide a tremendous amount of secure habitat. While we agree that human encroachment may be more of an issue in the future, we don’t believe it is a primary limiting factor at this time. We also disagree with the misinformation that available elk habitat is significantly limited as a function of timber management on private industrial timberlands. Logging is the stated reason why this herd was historically much larger in the Olympic Herd Plan. The habitat available on industrial timberland provides the vast majority of secure elk habitat now and in the future. Additionally, as forest rotations have been reduced on industrial timberlands the amount of time stands remain in closed canopy conditions with little forage for elk has been reduced. We also disagree that the limited timber management activities by U.S. Forest Service lands affects elk habitat to a lesser extent. The U.S. Forest Service manages a significant amount of land with very little creation of optimal elk foraging habitat from logging.

We believe this to be a far more significant factor affecting overall herd growth. We do-agree that habitat is a limiting factor for this herd and undoubtedly better forest management practices on industrial timberland would benefit elk. However, elk on the Olympic Peninsula are primarily limited by the intrinsic value of their forage and this must be considered when setting population objectives. Yet, there has not been evidence presented that the current population size is regulated by habitat and current objectives are too high. As discussed previously, our species indicates the population growth rate may be influenced by high rates of predation on neonates. We also believe this section completely ignores the influence of noxious weeds on recruitment. Although we acknowledge that the elk population is not declining, the rate of population growth is low which plays a key role in limiting subsistence and recreational elk harvest. It would seem Commission policy (RCW 77.04.012) would indicate pursuing all potential remedies to improve hunter harvest. While predator management is contentious, it should still be an important management tool that isn’t ignored.

The North Cascade (Nooksack) elk herd is continuing to grow and is not currently limited by the carrying capacity of the elk habitat. (page 48) We disagree with the statement and the primary causes. The current elk plan for the North Cascades Elk Herd is flawed with a population objective of 1,755 to 2,015 animals (see page 51). There is not enough habitat to support these numbers. As the herd has grown from 700 animals to 1,200 (see page 51) the depredation on private lands and the public safety issues on HWY 20 have increased exponentially. If the Nooksack herd is limited, it is probably as a result of agricultural lands adjacent to core elk habitat and the department's legal requirements to address wildlife damage. The top priority should be to reduce and stabilize the herd back to 700 animals by removing the elk that are depredating on private lands, then developing suitable habitat away from Ag lands and the HWY 20 corridor. The depredation on private lands and public safety issues on HWY 20 are severe issues and need to be dealt with sooner rather than later. It will accomplish little if the WDFW intends only to deal with the effect, which is the present management strategy.

The Colockum elk herd is limited by available habitat, hunting, and lethal removals related to resolving agricultural damage. We totally disagree with this statement. The Colockum elk herd is not limited by available habitat, hunting and lethal removal related to resolving agricultural damage (see page 51) which shows population estimates of 1,000 over-objective which has also been quoted by WDFW as 2,000 animals over objective. The WDFW is presently rewarding hunters with over 1,000 cow tags in the 2014 regulations. The growth of this elk herd has occurred by recruiting additional cows and increasing the harvest. The mortality level from hunting has been a significant factor as you described, it took fairly significant restrictions to grow this herd which has recently exceeded population objectives, so the recent hunting regulations are reflecting that. And finally, the mortality level from damage issues was significantly greater in the past than the 200 you described in recent years. There were extensive damage removals in the Wenatchee and Peshastin areas that were significantly reduced in order to increase this herd. Only in the Ellensburg area did damage removals stay high and even there they have come down from the first year or two.

The WDFW is aware of the forest practices conducted by USFS and DNR that are beneficial to elk. Clarifying language has been added to the plan.

As the new elk plans are finalized and the existing plans are revised, all will have a predator section similar to the Selkirk Elk Herd Plan. There are no peer-reviewed publications from the predation studies done in the White River and Green River drainages or the Olympic Peninsula that can be cited. The North Cascades elk herd plan is being revised at this time. The population objective stated is from the current plan. We agree that addressing the damage on the valley floor must be done or the population cannot expand. We agree with the comments on the Colockum herd and disagree with others. Obviously the Colockum herd is not limited by a significant factor as you described, it took fairly significant restrictions to grow this herd which has recently exceeded population objectives, so the recent hunting regulations are reflecting that. And finally, the mortality level from damage issues was significantly greater in the past than the 200 you described in recent years. There were extensive damage removals in the Wenatchee and Peshastin areas that were significantly reduced in order to increase this herd. Only in the Ellensburg area did damage removals stay high and even there they have come down from the first year or two.

We agree with the comments on the Colockum herd and disagree with others. Obviously the Colockum herd is not limited by a significant factor as you described, it took fairly significant restrictions to grow this herd which has recently exceeded population objectives, so the recent hunting regulations are reflecting that. And finally, the mortality level from damage issues was significantly greater in the past than the 200 you described in recent years. There were extensive damage removals in the Wenatchee and Peshastin areas that were significantly reduced in order to increase this herd. Only in the Ellensburg area did damage removals stay high and even there they have come down from the first year or two.

We are unsure why there are two background sections under the heading of Population Management. We note that "Herd wide estimates or indices for the North Rainier, South Rainier, and Olympic Herds have not been practical for a number of years". We agree that this work has not been a priority for WDFW within the Olympic Herd area and technically elk in Olympic National Park are not considered in the population estimate for the region. However, the Tribes have been collecting this data annually on a significant portion of the Olympic Peninsula and it has been provided to WDFW. We have also feel it important to note that the Tribes were working with WDFW to update population estimates for many GMUs. But we have been disappointed that since Greg Schirato’s leadership on behalf of WDFW in Region 6 was lost (moved to position with WDFW in Olympia) that the efforts on behalf of WDFW desisted.

As the new elk plans are finalized and the existing plans are revised, all will have a predator section similar to the Selkirk Elk Herd Plan. There are no peer-reviewed publications from the predation studies done in the White River and Green River drainages or the Olympic Peninsula that can be cited. The North Cascades elk herd plan is being revised at this time. The population objective stated is from the current plan. We agree that addressing the damage on the valley floor must be done or the population cannot expand.

We agree with the comments on the Colockum herd and disagree with others. Obviously the Colockum herd is not limited by a significant factor as you described, it took fairly significant restrictions to grow this herd which has recently exceeded population objectives, so the recent hunting regulations are reflecting that. And finally, the mortality level from damage issues was significantly greater in the past than the 200 you described in recent years. There were extensive damage removals in the Wenatchee and Peshastin areas that were significantly reduced in order to increase this herd. Only in the Ellensburg area did damage removals stay high and even there they have come down from the first year or two.

We are monitoring the Selkirk elk herd growth mainly from harvest data, but we are also attempting to develop a survey technique for this area and habitat that is difficult to monitor.

### Table

<table>
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<th>Index Number</th>
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<tr>
<td>1</td>
<td>How can the elk herd be limited by available habitat if it is reduced from its present population to its objective?</td>
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<tr>
<td>2</td>
<td>How can the elk herd be limited by hunting, this is a very devious statement when the only tool used to increase the population was to limit hunting.</td>
</tr>
<tr>
<td>3</td>
<td>Lethal removal to agriculture have been in use for 10+ years and the herd is still growing.</td>
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</tbody>
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226
The priorities for the Colockum herd are habitat conservation, habitat enhancement, resolving wildlife damage conflicts, and bull escapement. (page 48)

1. We disagree that a priority should be habitat conservation (purchasing more private lands).
2. We would agree to habitat enhancement for all species on WDFW lands. Currently, it appears there is little meaningful effort being expended in the way of habitat development on WDFW lands.
3. Resolving wildlife damage conflicts is an ongoing problem and can be partially resolved by reducing and stabilizing the population through hunter harvest and by adhering to the herd plan objective.
4. Bull escapement is not a problem, the WDFW just needs to find their wintering bulls and count them (see page 57). An alternative explanation to chronically low estimates ofbull core ratios deriving mainly from low bull survival is that the distribution of wintering bulls renders them poorly detectable under the traditional winter survey design for population monitoring employed for the Colockum herd (page 57).

The Selkirk elk herd is likely increasing in numbers and distribution based on harvest data and observations made by WDFW staff. The limiting factor for this herd is probably the amount of habitat created by active timber management and wildlife damage issues occurring on agricultural lands adjacent to elk habitat. (page 49)

The current Selkirk elk herd plan calls for increasing this herd, which will only increase the damage occurring on private agricultural lands. We note that the Selkirk elk herd plan did not have established population estimates in the past and is still lacking today. It would seem that this would have been a priority since wolves have begun to recognize Washington as the NE, particularly as the lessons learned from the NRM wolf recovery found that elk populations declined significantly.

Be specific. This is no objective. Talk about building wiggle room.

Incorporate regulations to allow wolves, cougars, and other predators to keep elk populations healthy by allowing them to feed on the sick an weak as nature intended.

On scientific base only

WDFW makes every effort to have sound objective science inform management decisions.

Keep it open ended for revisions.

WDFW plans evolve. Elk plans can be revised when emerging issues require revision.

No realistic about herd needs and numbers.

You cannot start changing the 2014 hunting season regulation for Elk Area 6013, to allow a late archery season and antlerless harvest with a muzzle loader and help prevent more crop damage from a 40-50% elk herd increase this summer with another calf crop.

The Spokane County herd was not addressed at all. It should have been.

The Spokane County herd was addressed in the Selkirk Elk Herd Management Plan.

50% success rate or less for hunters indicates area of low population or over hunting.

NO

your plans was done by a kid that knows nothing about elk. put your self in the shoes of a hunter. use common sense.

As soon as possible

This is an incorrect statement.

Please move the archery elk early season back to September 8th-21st like it used to be, and leave the dates the same every year.

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

yes... to include lethal means by property owners to protect private property.

A variety of lethal removal tools are available to landowners if they meet all of the requirements.

again letting people know what is your management plan

The management plans are available to the public on the WDFW web site. Hard copies can also be requested.

good plan

Thank you for your support.

Definitely

Thank you for your support.

Replace the spike only rule with a permit system

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

If you want to manage the elk herds you have to use the best tools available, as the sportsmen. If we cant hunt at the optimum time of year at least close to it there really isn't anything that can be done. Just look at the last few years stats for the elk harvest in the Yakima units. You gave out 250 antlerless permits in the little naches and 53 were harvested the year before wasn't much better. Our season needs to be moved back at least 1 week and the antlerless permits need to go for the whole season not just the last few days. Also if one side of the state gets a 12 day season then the other side should get the same length season. The elk in thesis areas are migratory and when there is no weather then the harvest is going to suffer that is why the season should be moved back. And also if the west side is a week later then the east side should be a week later. Both elk seasons should be at the same time and the same length of time.

please do

Thank you for your support.

Management plans seem to be very broad. Provide more information to the public so they can use it in determining where to hunt, scout, etc.

Move the season into the first week of november like it used to be.

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

We need more money spent on drafts and studies.

Yes we need more money spent on drafts and studies.

Yes. Please reduce elk tags availability. It's time to manage reduce your elk tags immediately before there on the endangered species list on the west side

Based on the information that we have there is no indication that elk hunting opportunity in western Washington needs to be reduced. We have reduced the antlerless special permits for the Mount St. Helens herd for 2014 as that population has been reduced to a more appropriate level.

Can't wait to see it.

Thank you for your support.

Support

Thank you for your support.

Objective 31: Monitor elk populations annually to determine whether they are consistent with Tables 1 and 2.

PUBLIC COMMENT

WDFW RESPONSE

(1 comment) Agree

Thank you for your support.

(24 comments) Yes

Thank you for your support.

(2 comments) OK

Thank you for your support.
Objective 31
Strategy a. Conduct aerial surveys to estimate populations, estimate indices, or to estimate composition ratios of bull, cows, and calves when funding is available. This strategy publically sums up what many Tribes have known to be the case. Surveys to verify that the criteria in Table 2 are only conducted when funding is available. We understand that population estimates for each GMU in a herd plan can be costly and preclude efforts on a routine basis. Annual surveys in a subset of GMUs that adequately provide data on composition at a minimum should be part of the annual budget in each Region. Without this basic information how can decisions on liberalizing/restricting seasons be set? The WDFW has access to tremendous funding dedicated to annual population monitoring of elk. Why are elk which provide significant recreational and subsistence hunting opportunity not prioritized. Tribes have access to far less stable funding levels, yet prioritize this data collection annually. The lack of funding dedicated to annual population monitoring of elk illustrate why the predator management guidelines in this GMP are unlikely to be implemented.

I agree with the monitoring - but have no idea what is in Tables 1 and 2. Thank you for your support. Table 1 is on page 51 and Table 2 is on page 52.

need to do a better job of this

Don't worry about the Elk. Worry that there may not be enough wolves, bears and cougars to balance their numbers and keep them in the hills away from conflicts and salmon.

Definitely. Thank you for your support.

There is no reason, scientific or biological, to maintain the same bull/cow ratio in an urban/agriculture farm community GMU vs a crop damage, as there is in a Forest Service, BLM or Timber company lands GMU with a large hunter access to control the wildlife population. Some populations hunting seasons may have to be changed each year.

Thank you for your support.

However often makes sense.

Should already be doing this. WDFW is currently doing this but the intent of the objective being in the plan is to indicate that we will continue to do this. Language has been added to the objective to clarify.

Do like fish. Make 30pt only areas, we need big game if we want to keep the gene pool viable. We need to preserve the large animals.

We have restrictions and season structures in place to meet post-hunt bull objectives.

also be in the tribal reports of their hunting activity, is true and honest for what he harvest. when they were given access to the lands within the city of acoma watershed to hunt, with in the first year they had decimated the elk herd entirely, claiming it was cougar predation that killed all the animals. i personally had seen 300 - 400 elk, at one time in that locale, (lester), since their being allowed to hunt there, i have seen but one cow elk, and in 20 yrs or more hunting only one cougar near there?

Tribal rights are reserved in federal treaties and the Department has no authority over tribal hunting regulations or tribal harvest reporting.

You mean one more than the wolves have killed off. Lets start talking a twenty five percent over harvest season package development.

Agree also monitor tribal hunting closely with use of cameras

WDFW does not have the staff or the resources to monitor legal tribal hunting.

You mean one more than the wolves have killed off. Lets start taking a twenty five percent over carry capacity to prevent shortages due to wolves.

All sources of mortality, including hunting, are taken into account when managing elk. Managin an elk population above the level that the landscape can support would do more harm than good.

More elk less wolves

WDFW tries to manage elk populations as close to objective as possible while taking into account all sources of mortality.

The small elk herds in n.e. washington are a joke......calf recruitment is almost non

Thank you for your comment. The elk herd in NE is continuing to grow and expand which is evident by the continuing increase of elk harvested in the District and the observations of more and more elk by people like yourself. Calf recruitment is likely better than you think since the population is growing and expanding in distribution.

Objective 32: Maintain a sustainable annual elk harvest (range 7,750 to 9,000) that is consistent with the population objectives in Tables 1 and 2.

PUBLIC COMMENT

(18 comments) Yes.

Thank you for your support.

(15 comments) OK

Thank you for your support.

(3 comments) No.

Thank you for your support.

determine the cause of decreasing elk populations

WDFW is going to continue to provide the type of opportunity to meet this harvest objective.

This is a good point, thank you. Exception language has been added to Objective 31.

Is this range consistent with the wolf pack numbers and population increase you expect? Maybe you should check with Idaho wildlife managers for their experiences.

The ranges are in light of all sources of mortality. WDFW has consulted with IDFG managers on a number of occasions.

You mean one more than the wolves have killed off. Lets start taking a twenty five percent over carry capacity to prevent shortages due to wolves.

Managing an elk population above the level that the landscape can support would do more harm than good.

More elk less wolves

WDFW tries to manage elk populations as close to objective as possible while taking into account all sources of mortality.

Not very good numbers considering it wasn't that long ago when the harvest was double those numbers.

The objectives are consistent with harvest averages for the past 15 years.

The small elk herds in n.e. washington are a joke......calf recruitment is almost non

Thank you for your comment. The elk herd in NE is continuing to grow and expand which is evident by the continuing increase of elk harvested in the District and the observations of more and more elk by people like yourself. Calf recruitment is likely better than you think since the population is growing and expanding in distribution.

What is that objective????

It is Objective 32.

Not rational.

The last 15 years have met this objective so we think it is.

Will respect especially to muzzledrailer elk create a GMU rotation that would permit hunting in each GMU at least once every 3 years - pref every 2 years. A hunter should have the opportunity to hunt at least every couple of years in the unit (s)he is most familiar with.

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

Briefly state the reason why you are commenting on this objective.

This is covered on page 56 and in Objective 3.

Not very good numbers considering it wasn't that long ago when the harvest was double those numbers.

The ranges are in light of all sources of mortality. WDFW has consulted with IDFG managers on a number of occasions.

With respect especially to muzzledrailer elk create a GMU rotation that would permit hunting in each GMU at least once every 3 years - pref every 2 years. A hunter should have the opportunity to hunt at least every couple of years in the unit (s)he is most familiar with.

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

Make seasons later in the year for migratory herds to keep numbers in check.

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

Try 75,000 to 90,000

There are fewer elk than in the entire state of Washington so it would be impossible to provide that level of harvest.

Only if there are adequate bulls. There needs to be at least 25% mature bulls to harvest and there needs to be a shortened season for all user groups hunting. There also needs to be a TRUE population in each game unit as well.

This is covered in Objective 31.
A review of past elk harvest records will show a decline in harvest over the past thirty years. The harvest in the last ten years has been reduced due to the change in general season dates becoming earlier by several weeks. The elk have not migrated from the summer ranges, in the national parks, to the wintering areas in the lowlands. The result of the season changes is evident in the fact that the game check stations have not even been manned during the general hunt. The end result is that the feeding requirements have increased. I have hunted the Wenatche drainages for thirty years, the opening of the general season has moved earlier by about two weeks making for a low harvest. The hunters are there but the meat poles have been empty and the elk check station has not been busy. Please review the game check station records to verify my comments!

Not sure

*The goal should be to keep the populations stable despite urban encroachment

and what is the objectives one who buy the license should know

We do recognize factors that can be effecting an elk population, potentially managing predators at a lower overall from human development over a 6 year period? Are you assuming that predation on elk is largely enhanced? Does a conservation easement on 2,000 acres equate to expected losses in elk habitat is happening in an elk herd, so management actions may or may not have an effect on it?

Not sure this is a realistic with degrading habitat and hoof rot issue

We need more to protect from closures due wolf kills.

Please get our elk numbers back up to where they should be.

More elk less wolves

How are you to manage a sustainable harvest when the department keeps moving the hunting season earlier each year before the snows come and shortening the seasons.

How many elk can 2,000 acres support? What is the difference between the carrying capacity after it is enhanced? Is the WDFW assuming that predation on elk is largely enhanced? Does a conservation easement on 2,000 acres equate to expected losses in elk habitat is happening in an elk herd, so management actions may or may not have an effect on it?

How many elk can 2,000 acres support? Will there be a significant change in carrying capacity after it is enhanced? Does a conservation easement on 2,000 acres equate to expected losses in elk habitat from human development over a 6 year period? Are you assuming that predation on elk is largely compensated due to habitat and enhancement will improve calf recruitment? There are many factors that can be effecting an elk population, potentially managing predators at a lower overall level would improve elk populations. We do recognize the importance of protecting and restoring elk habitat and recognize it may be beneficial at a small scale. We recommend that noxious weed issues be highlighted as a serious focus of habitat enhancements as discussed previously (see page 48 comments).

We understand that maintaining or enhancing 2,000 acres sounds attractive on the surface. But question whether 2,000 acres makes a significant difference over the 6 year period. How many elk can 2,000 acres support? Will there be a significant change in carrying capacity after it is enhanced? Does a conservation easement on 2,000 acres equate to expected losses in elk habitat from human development over a 6 year period? Are you assuming that predation on elk is largely compensated due to habitat and enhancement will improve calf recruitment? There are many factors that can be effecting an elk population, potentially managing predators at a lower overall level would improve elk populations. We do recognize the importance of protecting and restoring elk habitat and recognize it may be beneficial at a small scale. We recommend that noxious weed issues be highlighted as a serious focus of habitat enhancements as discussed previously (see page 48 comments).

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Habitat should be the #1 priority. Thank you.
Maintain an adequate range — do not acquire. Thank you for your comment. Habitat is such a premium that acquisition sometimes has to be part of management to keep habitat from being lost completely.
that or more. WDFW is trying to keep the objective realistic.
Focus on Roosevelt first because they are fewer. For Rocky mtn -- stop poaching, excessive damage complaints, and allow access to other winter ranges -- get rid of high fences. Based on harvest data Roosevelt elk and Rocky Mountain elk are about equal. Maintaining habitat helps with damage. Removing fences would increase damage.
Maintain and enhance, yes. Why is it necessary to add more habitat? Habitat is constantly being lost to development.
OK, if that’s a reasonable number. Why not more or less. WDFW is trying to keep the objective realistic.
Unknown. Thank you.
Habitat should also be a safe haven for other species, including predators. Maintaining quality habitat does not necessarily equate to safe haven for any wildlife species.
How about 2,000,000 acres? That would be an unrealistic objective. WDFW is trying to keep the objective realistic.
Habitat is where its at. We agree.
At the very least, more would be better. WDFW is trying to keep the objective realistic.
cool. We agree.
Very weak goal — up the acres here. WDFW is trying to keep the objective realistic.
Yes, as long as it meets domain is not used. WDFW only purchases land on a willing-seller basis.
o more land should be purchased public land habitat should be improved to support more animals away from private lands especially if damage claims and complaints are occurring. WDFW will continue to focus attention on elk habitat whenever possible.
More is better. WDFW is trying to keep the objective realistic.
A 2000 would be better. WDFW is trying to keep the objective realistic.
good. Thank you for your support.

The acreage for maintain and enhance sounds low. Please continue coordinating projects with RMEF to maximize effectiveness. WDFW is trying to keep the objective realistic.
What is meant by maintain? Maintain may be detrimental to the management of the species in question and to other species in the ecosystem. In the context of the sentence the implication is that sub-par habitat would be enhanced and good quality habitat would be maintained.
2,000 acres is not that much land when it comes to elk. Shoot for 20,000 acres. WDFW is trying to keep the objective realistic.

Shoot for 20,000 acres. WDFW is trying to keep the objective realistic.

enhancing habitat goal is minor in overall degrading habitat. WDFW is trying to keep the objective realistic.
Great. Thank you for your support.
More land than that, as much as possible. WDFW is trying to keep the objective realistic.

Do whatever it takes us to save our Roosevelt herd. Thank you for your support.

Agree as long as it will be available to hunters and not created as an exclusion zone. Recreation is always considered when acquisitions are contemplated.

More. WDFW is trying to keep the objective realistic.

Goods. Thank you for your support.

Definitely. Thank you for your support.

Only if you pay the land taxes as we do. WDFW makes payment in lieu of taxes (PILT) to the counties.
At least, preferably much more. WDFW is trying to keep the objective realistic.

Objective 35: Conduct an evaluation of the current elk-feeding program. Reduce the dependency on supplemental feeding if possible.

PUBLIC COMMENT

WDFW RESPONSE

(5 comments) Agree with reducing the dependency on supplemental feeding. Thank you for your support.
(23 comments) Yes. Thank you for your support.
(3 comments) OK. Thank you.

Feeding elk to increase human populations is a serious mistake. Currently the feeding program conducted by WDFW in conjunction with fencing, is intended to prevent elk from causing damage on agricultural lands (crops, orchards, haystacks, etc.).

I think you are dreaming. to maintain current herd levels with an increasing human population will require more feeding not less. That’s why the objective reads “if possible.”

Stop developing winter feeding grounds, I don’t know how you can do that! WDFW doesn’t have the authority in most cases, to stop development. That typically falls to county governments.

Unless there is a risk of mass starvation, I think supplemental feeding is a bad idea. It increases the spread of disease if the animals congregate to feed. Currently the feeding program conducted by WDFW in conjunction with fencing, is intended to prevent elk from causing damage on agricultural lands (crops, orchards, haystacks, etc.).

If there is any kind of supplemental feeding program than WDFW is completely justified to say that wolves and cougar predators can be said to have a first-ri ght to elk and that human hunting allotments take a second place (in an determination of elk population goals or expectations). That is not consistent with WDFW’s mandate and mission.

Feeding Elk teaches them to ruin crops, artificially increases their numbers and causes environmental damage to seedlings and salmon habitat. We need more predators, not more Elk. Currently the feeding program conducted by WDFW in conjunction with fencing, is intended to prevent elk from causing damage on agricultural lands (crops, orchards, haystacks, etc.).

Only feed when it is necessary for recruitment and survival. Currently the feeding program conducted by WDFW in conjunction with fencing, is intended to prevent elk from causing damage on agricultural lands (crops, orchards, haystacks, etc.).

That will only be accomplished if you give back the winter range or reduce the elk herd, neither is going to be popular with your constituency. Thank you for your comment.

We should not be feeding Elk just so they can be hunted. Currently the feeding program conducted by WDFW in conjunction with fencing, is intended to prevent elk from causing damage on agricultural lands (crops, orchards, haystacks, etc.).

let the line “and where not economically feasible.” You may have misinterpreted the meaning of the objective. Go to the plan and re-read the objective and the associated strategies.

I don’t see supplemental feeding as an issue. Read the background information in the plan. It spells out the issues.

Increase harvest rates by making seasons later to harvest migratory elk. We take this to mean you want the populations reduced through hunting.

Allow more logging so they have small shoots of new growth to eat. Active logging and thinning takes place on DNR and WDFW land, not to mention private timber lands. Currently the feeding program conducted by WDFW in conjunction with fencing, is intended to prevent elk from causing damage on agricultural lands (crops, orchards, haystacks, etc.).

Why? Read the background information in the plan. It spells out the issues.

Disagree. We need to do more to keep a healthy population going. Read the background information in the plan. It spells out the issues.

no comment OK but “no comment” is a comment.

If it means lowering the herd size you can’t stop feeding elk in the winter time where do they go weather will drive them down and will end up in farmers fields where now you have to do more damage control. which is cheaper? The intent is to make the population less dependent on feeding without changing the population objective.

why wind more look to reduce? The intent is to make the population less dependent on feeding without changing the population objective.

Not if it means lowering the herd size. Thank you for your comment.

You can’t stop feeding elk in the winter time where do they go weather will drive them down and will end up in farmers fields where now you have to do more damage control. which is cheaper? The intent is to make the population less dependent on feeding without changing the population objective.

During good mild winters that should be the plan but during real bad maybe increase it if needed During good mild winters that should be the plan but during real bad maybe increase it if.
We also suspect that the predator management guidelines as drafted currently will inhibit actual implementation of strategies that help at-risk ungulate populations. We suspect that the rigorous predator management guidelines will inhibit actual implementation of strategies that help at-risk ungulate populations. Unfortunately there is only limited data collected on most herds, and many do not have size monitored. We hope that action will occur once the data are collected and analyzed. There is no evidence to suggest that herbicides are associated with hoof disease. WDFW does not have the authority to ban the use of pesticides. That authority lies with the Federal EPA.

This is a good definition and likely can be documented. We hope that action will occur once the data are collected and analyzed. The intent is to make the population less dependent on feeding without changing the population objective. WDFW does adapt the feeding operation each year depending on winter conditions.

Volunteers will come in handy on this one. WDFW will be using volunteers to help determine prevalence and distribution of hoof disease.

WDFW uses extensive outreach efforts when it comes to wildlife disease but there is always room for improvement. WDFW always uses objective, rigorous science when conducting disease monitoring. Routine tests are done on animals that are captured for radio-marking. Some samples can also be collected from dead, hunter-harvested animals.

Public Comment: Agree (9 comments) Thank you for your support. Yes and age class by tooth samples. All of this information should be kept as data that is available to the public each year. Look for pesticide induced hoof rot, especially on Weyerhauser land. Anorexia must be banned everywhere. It kills the hoof micro-ecosystem that keeps bacteria in check.

You accomplish this by moving the season ahead so hunters have something to hunt. We take this to mean you want the populations reduced through hunting. Yes (24 comments) Thank you for your support. Yes and age class by tooth samples. All of this information should be kept as data that is available to the public each year. Look for pesticide induced hoof rot, especially on Weyerhauser land. Anorexia must be banned everywhere. It kills the hoof micro-ecosystem that keeps bacteria in check.

WDFW is actively pursuing all aspects of hoof disease diagnosis and mitigation. We suspect that the predator management guidelines as drafted currently will inhibit actual implementation of strategies that help at-risk ungulate populations. We hope that action will occur once the data are collected and analyzed. There is no evidence to suggest that herbicides are associated with hoof disease. WDFW does not have the authority to ban the use of pesticides. That authority lies with the Federal EPA.

An at-risk population would also include any ungulate population which falls 25% below its population objective for two consecutive years or if the harvest decreases by 25% below the 10-year average harvest for two consecutive years. This is a good definition and likely can be documented. We hope that action will occur once the data are collected and analyzed. Unfortunately there is only limited data collected on most herds, and many do not have size monitored. We suspect that the rigorous predator management guidelines will inhibit actual implementation of strategies that help at-risk ungulate populations.

The intent is to make the population less dependent on feeding without changing the population objective. The intent is to make the population less dependent on feeding without changing the population objective. WDFW has not detected (physical exams, blood samples) any disease problems associated with feeding operations to date, but we do want to reduce that possibility.

Support, but I also support the feeding program if elk herds need it to maintain population levels. The intent is to make the population less dependent on feeding without changing the population objective.

OBJECTIVE 3C: Opportunistically monitor the health of wild elk in Washington when they are captured for other reasons and samples can be readily obtained. Take blood and tissue samples when elk are captured and/or from harvested elk and test for diseases common to elk. When necessary capture or collect elk to address specific disease issues.

PUBLIC COMMENT

WDFW RESPONSE

Support for not letting us hunt the last two weeks of September. I would rather hunt the first two weeks of September is also very low. When it comes to herd numbers, I can’t see any common sense reason for not letting us hunt the last two weeks of September. I would rather hunt the first two weeks of October then the first two weeks of September. Can we please think about changing the Archery Season to the first two weeks of October? I’m actually thinking about quitting hunting in Washington due to the lousy Elk Season we have now.

WDFW already does this. Improvement would be to use volunteers to help determine prevalence and distribution of hoof disease. WDFW always uses objective, rigorous science when conducting disease monitoring. Routine tests are done on animals that are captured for radio-marking. Some samples can also be collected from dead, hunter-harvested animals.

WDFW takes every attempt to use objective science to inform management decisions.

Recent research projects have been completed pertaining to the Mount St. Helens herd. WDFW makes every attempt to use objective science to inform management decisions.

The intent is to reduce the dependency on feeding, not eliminate it entirely. We take this to mean you want the populations reduced through hunting. The intent is to reduce the dependency on feeding, not eliminate it entirely.

The intent is to make the population less dependent on feeding without changing the population objective. WDFW has not detected (physical exams, blood samples) any disease problems associated with feeding operations to date, but we do want to reduce that possibility.

We also suspect that the predator management guidelines as drafted currently will inhibit actual implementation of strategies that help at-risk ungulate populations. We hope that action will occur once the data are collected and analyzed. There is no evidence to suggest that herbicides are associated with hoof disease. WDFW does not have the authority to ban the use of pesticides. That authority lies with the Federal EPA.

The intent is to make the population less dependent on feeding without changing the population objective. The intent is to make the population less dependent on feeding without changing the population objective. WDFW uses extensive outreach efforts when it comes to wildlife disease but there is always room for improvement. WDFW always uses objective, rigorous science when conducting disease monitoring.

The intent is to make the population less dependent on feeding without changing the population objective. The intent is to make the population less dependent on feeding without changing the population objective.

Objectives:

Objective 36: Opportunistically monitor the health of wild elk in Washington when they are captured for other reasons and samples can be readily obtained. Take blood and tissue samples when elk are captured and/or from harvested elk and test for diseases common to elk. When necessary capture or collect elk to address specific disease issues.
especially if it continues to spread as fast as it currently is. This epidemic could devastate all elk in the region has dropped by over 75% in the last 5 years. thanks to the Department for their commitment. We need to continue with the same level of effort to address the issue. If the Department doesn't come up with a clear plan for how to mitigate hoof rot disease, there won't be any elk left in the region to hunt. Expect hunter participation levels in this region to decline. The only group who would want fewer animals would be the few farmers affected. Don't let them dictate herd size. The Yakima elk herd I believe is actually made up of five groups. One management plan does not fit all of the sub groups of the so called Yakima herd. Consideration should be given to developing separate plans and manage the animals accordingly. This objective does pertain to the elk plan. It is impractical to carve up the Yakima population into 5 separate sub-groups with their own management plans. why not bring the population of non-resident humans within that area, so the animals have more room to move around? This is accomplished by using radio-collars on the animals and following up on mortalities to obtain cause of death. And publish results. At the very least the project will be published as a final agency report. Yes, but big game should never be managed with economic value as the deciding factor. YES, don't just arbitrarily reduce or increase the herd like happened in Colockum. ODF. I can save you a lot of time and money and game. You'll see the ratifications next year when your total hunters licenses drop. This is a must do and game. You'll see the ratifications next year when your total hunters licenses drop. I can save you a lot of time and money and game. You'll see the ratifications next year when your total hunters licenses drop. 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Objective 41: Establish and implement consistent survey protocols for black-tailed deer by 2021.

PUBLIC COMMENT

WPFW RESPONSE

(3 comments) Agree

WPFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

(3 comments) OK

Correct. That is why WPFW is pursuing better protocols.

(6 comments) Agree

WPFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

Objective 40

This objective is poorly worded as well. Again, what are the survey protocols to be implemented? It appears from the strategies that they primarily deal with developing a mechanism for population estimate protocols for black-tailed deer are working by 2021.

WPFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

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habitat enhancements. This strategy should be eliminated or a new objective should be drafted that deals with habitat issues. If another objective is drafted, we feel strongly that the influence of noxious weeds should be discussed and prioritized for action as we commented on for elk (Strategies, page 48 and Habitat Management, pages 54-55). We recommend that another strategy be incorporated that reflects the need to conduct annual composition surveys in a subset of GMUs. Finally, what about tracking hair loss incidence rates, seems this should be an issue of high priority based on Makah research and would fit as a survey protocol. This could be incorporated in post season composition surveys. We do note that Objective 49 mentions monitoring for HLS, but has no definitive strategy for it or any other disease (see following comments).

**By 2016**

WDFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

**Do it by 2015**

WDFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

**good**

WDFW uses hunter input whenever it can.

**Hunters input**

Thank you for your support.

**I agree with this objective.**

Thank you for your support.

**It's a little late don't you think**

Thank you for your comment.

**Leave them alone.**

Thank you for your comment.

**u better move faster than that**

WDFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

**Why wait that long?**

WDFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

**Great plan!**

Thank you for your support.

**Sooner than 2021 is needed.**

WDFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

**Yes, but how can we manage Black Tail Deer when there is no data collected as to their populations? We should be using all state agencies to collect data in each area worked to share with WDFW. There should be a computer data program in place to make this data collecting easier.**

WDFW is currently conducting research to address this challenge. That work will inform any new protocols that will be developed.

**Objective 42: Continue to implement, refine, and expand survey protocols for mule deer.**

**PUBLIC COMMENT**

- **(6 comments) Agree**
  - Thank you for your support.
- **(4 comments) No**
  - Thank you for your comment.
- **(4 comments) OK**
  - Thank you for your support.
- **(19 comments) Strongly agree**
  - Thank you for your support.
- **(23 comments) Yes**
  - Thank you for your support.

**Hunters input**

WDFW will continue to refine and improve these protocols.

**I agree with this objective.**

Thank you for your support.

**Mule Deer are not over hunted by humans.**

WDFW tries to use hunter input whenever possible.

**The survey is Wrong.**

WDFW disagrees with this statement. Survey and harvest data show no indication of overharvest.

**We have those?**

Yes, we currently have protocols in place for most of the mule deer populations. WDFW will continue to refine and improve these protocols.

**Great idea!**

Thank you for your support.

**Objective 43: Use the information provided by the Cooperative Mule Deer Research study to manage mule deer at an ecoregional scale.**

**PUBLIC COMMENT**

- **(6 comments) Agree**
  - Thank you for your support.
- **(4 comments) No**
  - Thank you for your comment.
- **(4 comments) OK**
  - Thank you for your support.
- **(15 comments) Strongly agree**
  - Thank you for your support.
- **(2 comments) Yes**
  - Thank you for your support.

**Hunters input**

WDFW uses objective, rigorous science to inform management decisions.

**I agree with this objective.**

Thank you for your support.

**No killing of does. Start planting beans and other food stuffs as part of reforestation.**

Antlerless harvest is an integral part of deer management.

**Strongly agree. Cut back on the doe kills!!!**

Thank you for your support. Antlerless harvest is an integral part of deer management.

**WDFW tries to match the level of antlerless opportunity with the population control needs.**

Thank you for your comment.

**hard look at the numbers**

Thank you for your comment.

**Support**

Thank you for your support.

**Not sure**

Thank you for your comment.

**Should be done for Game units with under 50 buck harvest not over 50 buck harvest**

This is an attempt to prioritize effort.

**Objective 44: Document buck:doe ratios for a sample subset of GMUs where at least 50 bucks are harvested each year.**

**PUBLIC COMMENT**

- **(5 comments) Agree**
  - Thank you for your support.
- **(4 comments) No**
  - Thank you for your comment.
- **(4 comments) OK**
  - Thank you for your support.
- **(15 comments) Strongly agree**
  - Thank you for your support.
- **(2 comments) Yes**
  - Thank you for your support.

**Hunters input**

WDFW uses hunter input whenever it can.

**I agree with this objective.**

Thank you for your support.

**No killing of does. Start planting beans and other food stuffs as part of reforestation.**

Antlerless harvest is an integral part of deer management.

**Strongly agree. Cut back on the doe kills!!!**

Thank you for your support. Antlerless harvest is an integral part of deer management.

**WDFW tries to match the level of antlerless opportunity with the population control needs.**

Thank you for your comment.

**hard look at the numbers**

Thank you for your comment.

**Support**

Thank you for your support.

**Not sure**

Thank you for your comment.

**Should be done for Game units with under 50 buck harvest not over 50 buck harvest**

This is an attempt to prioritize effort.

**Objective 45: Improve and expand the existing survey protocols for white-tailed deer.**

**PUBLIC COMMENT**

- **(6 comments) Agree**
  - Thank you for your support.
- **(4 comments) No**
  - Thank you for your comment.
- **(4 comments) OK**
  - Thank you for your support.
- **(15 comments) Strongly agree**
  - Thank you for your support.
- **(2 comments) Yes**
  - Thank you for your support.

**Hunters input**

WDFW uses objective, rigorous science to inform management decisions.

**I agree with this objective.**

Thank you for your support.

**No killing of does. Start planting beans and other food stuffs as part of reforestation.**

Antlerless harvest is an integral part of deer management.

**Strongly agree. Cut back on the doe kills!!!**

Thank you for your support. Antlerless harvest is an integral part of deer management.

**WDFW tries to match the level of antlerless opportunity with the population control needs.**

Thank you for your comment.

**hard look at the numbers**

Thank you for your comment.

**Support**

Thank you for your support.

**Not sure**

Thank you for your comment.

**Should be done for Game units with under 50 buck harvest not over 50 buck harvest**

This is an attempt to prioritize effort.
**Objective 46:** Use the information from the completed Mule Deer Cooperative Study, such as the relationship between habitat, predation, body condition, and other factors as they relate to Washington mule deer survival and recruitment to inform mule deer management.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 comments Agree</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>6 comments No</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>4 comments OK</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Should have already been done</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Try looking for them in the residential rural interface!! No shortage in my backyard but the local GMU says there isn't many around.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Try something other than counting deer in a field and guessing...........</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>White tails are increasing. No study needed except Columbia whitetail.</td>
<td>Whether increasing or decreasing it is important to know population trend.</td>
</tr>
<tr>
<td></td>
<td>Thank you for your support.</td>
</tr>
</tbody>
</table>

**Objective 47:** Continue and complete the current black-tailed deer research to develop a better understanding of population dynamics, survival, habitat needs, and population estimation techniques for black-tailed deer.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 comments Agree</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>5 comments No</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>4 comments OK</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>22 comments Yes</td>
<td>Survey and harvest data show no indication of overharvest of mule deer.</td>
</tr>
<tr>
<td>Including over hunting by humans.</td>
<td>As the objective suggests we will do more than look.</td>
</tr>
<tr>
<td>Do more than look</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Good</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Support</td>
<td>Thank you for your support.</td>
</tr>
</tbody>
</table>

This information should have already been gathered. People should have access to it.

**Objective 48:** Continue and expand the current white-tailed deer research.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 comments Agree</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>7 comments No</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>3 comments OK</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Yes, comments Yes</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Agree, although of the three species, since these are non-native they should be lower priority</td>
<td>White-tailed deer are native to Washington state. They provide 1/3 of the deer hunting opportunity and are therefore a priority.</td>
</tr>
<tr>
<td>Be more specific! This objective is pie in the sky. What exactly do you hope to determine from researching white tailed deer?</td>
<td>WDFW will learn survival, movements, some measure of body condition which translates to a measure of habitat quality, and resource use and resource selection functions will be developed to better measure habitat use. The first graduate student has completed their project and is analyzing data and writing manuscripts so this is not a “pie-in-the-sky” effort by any means.</td>
</tr>
<tr>
<td>Good</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>How does it help</td>
<td>This will help focus management attention on land management recommendations. It will also provide information on movements and migration, which are turning out to be far more complicated and dramatic than first expected. I will also help with hunting season development especially for antlerless deer.</td>
</tr>
<tr>
<td>Hunters input</td>
<td>Thank you for your comment.</td>
</tr>
</tbody>
</table>

As stated in the background for this objective, little is known about survival, population...
Why do you need to research them?

As stated in the background for this objective, little is known about survival, population dynamics, and movements of white-tailed deer in Washington State. WDFW will learn survival, movements, some measure of body condition which translates to a measure of habitat quality, and resource use and resource selection functions will be developed to better measure habitat use.

Objective 49: Monitor deer for disease each year and implement means to reduce the risk of disease when possible.

PUBLIC COMMENT

WASHINGTON RESPONSE

WDFW has highlighted the need to address this issue and we believe it should be monitored through post harvest monitoring. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Disease (Pages 68-69)

Were pleased to see hair loss in deer finally mentioned in the document, but it appears that its influence on population management is not fully recognized. Hair Loss Syndrome is extremely wide spread and prevalent in black-tailed deer populations and should receive more emphasis in the document. Particularly as Makah research has documented it is limiting population growth.

Based on the objective provided there is no indication how hair loss monitoring would occur, at what intensity, and what role its influence will play in management. Our previous comments have highlighted the need to address this issue and we believe it should be monitored thru post season composition counts which should be performed annually. We believe it would be better addressed under Objective 41.

Agree, as long as it can be ensured that infected sheep can be kept away from them

Thank you for your support.

(28 comments) Yes

Thank you for your support.

WDFW is currently conducting black-tailed deer research to address this challenge. That work will inform any new protocols that will be developed.

Objectives 50: Identify locations within existing bighorn sheep ranges where prescribed burns or noxious weed eradication can be accomplished in a cost-efficient manner.

PUBLIC COMMENT

WASHINGTON RESPONSE

And then act on the findings.

Thank you for your comment. Strategy 50.b is to accomplish at least one prescribed burn in a priority area by 2016. Strategy 50.c is to work with federal (e.g., USFS, BLM) and other state land management agencies (e.g., DNR) to elevate the importance in their planning of fire management policies beneficial to bighorn sheep.

(1 comment) Agree or OK

Thank you for your comment.

(2 comments) NO

Thank you for your comment.

Yes (includes “sounds good” and “yes Please”) (22 comments)

Thank you for your comment.

(agree and it can help forest health at the same time

Thank you for your comment.

And in an ecologically responsible manner.

Thank you for your comment.

don’t know

Thank you for your comment.

good

Thank you for your comment.

Land manager already should have this information

Thank you for your comment.

OK

Thank you for your comment.

Support

Thank you for your comment.

Why is the sheep section so much more detailed than other species.

Thank you for your comment.

Sounds good.

Thank you for your comment.

we have also bighorn's.

Thank you for your comment.

Objective 51: Identify locations within and adjacent to existing bighorn sheep ranges where habitat acquisition of private land (either through fee title or conservation easement) is a high priority.

PUBLIC COMMENT

WASHINGTON RESPONSE

Not merely identify...acquire the land instead

Thank you for your comment. Strategy 51.a. states “Pursue conservation easements or fee title purchases for properties identified as high priorities when opportunity arises”.

(15 comments) Agree (includes “OK”,”Good”, and “Good idea”)

Thank you for your comment.

(4 comments) NO

Thank you for your comment.

Only if it benefits multiple species

Thank you for your comment.

there should not be more public funds for private land the state already owns too much land

Thank you for your comment.

(13 comments) Yes

Thank you for your comment.

yes - and work in partnership

Thank you for your comment.

you can relocate people - you cannot relocate the animals - they are there for a reason that being that there is there environmental range. That those conditions exist where they do and where the animals reside is paramount to their survival. DO NOT ALLOW people to move into areas where the animals range is - just as you should not allow people to build their residences in the middle of woods that are highly inaccessible and then have to expend exhorbitant resources in order to save them or bail them out.

Thank you for your comment.

Objective 52: Re-establish a bighorn herd in the existing Tieton herd habitat patch by 2016, and monitor for reproduction and population trends by 2018.

PUBLIC COMMENT

WASHINGTON RESPONSE

Agree, as long as it can be ensured that infected sheep can be kept away from them

Thank you for your comment. Your concerns about genetic diversity are valid, and are shared by WDFW. Unfortunately, Swayne herd bighorn sheep derive from a very similar set of founders as do Cleman Mountain bighorn sheep. We are investigating the possibility of acquiring bighorns from outside Washington, in part to optimize genetic variation, while at the same time ensuring that new founders have the requisite experience with habitats and predators found in the Tieton area.

How long should habitat be vacant to ensure disease is not still there?

Thank you for your comment. Fortunately, the bacteria causing pneumonia in bighorns do not persist in the environment, so there is no specific time that needs to be waited before bighorns can be reintroduced. Rather, the issue is minimizing the probability of another interaction with domestic sheep or goats. Strategy 52.a “Identify risks to Tieton bighorns posed by presence of domestic sheep and/or goats” and 52.b: “Minimize risks through combination of education, fencing, disease treatment, herd buy-outs, and other actions identified through ongoing analyses.”

Absolutely expand every opportunity to have with sheep maybe bring in from swakane herd then we would have different genetics to cross with clemens herd

Thank you for your comment. Your concerns about genetic diversity are valid, and are shared by WDFW. Unfortunately, Swayne herd bighorn sheep derive from a very similar set of founders as do Cleman Mountain bighorn sheep. We are investigating the possibility of acquiring bighorns from outside Washington, in part to optimize genetic variation, while at the same time ensuring that new founders have the requisite experience with habitats and predators found in the Tieton area.

Move up 2 years please.

Thank you for your comment. It would be imprudent for us to reintroduce bighorn sheep.
Only pursue this objective if existing cougar populations are protected and individual cougars are not "removed" if they prey on this population of sheep.

Support

what happened to the herd

The Tetons herd suffered a severe die-off in winter-spring 2013 from pneumonia. In order to safeguard the adjacent Cleman herd from this very contagious pathogen, remaining animals (roughly one-quarter to one-third of the estimated initial number) were euthanized.

Wonderful idea but be sure to get rid of all domestic sheep first.

Thank you for your comment. Strategy 52 a: "Identify risks to Teton bighorns posed by presence of domestic sheep and/or goats" and 52 b: "Minimize risks through combination of education, fencing, disease treatment, herd buy-outs, and other actions identified through ongoing analyses."

The state has no plans to ban pack goats from the state. Thank you for your comment.

Apply direction to eliminate domestic sheep and goats from native ranges of bighorn sheep.

Thank you for your comment. WDFW currently has no plans to ban pack goats from lands it manages, nor is it actively engaged in encouraging other land owners to do so. Domestic goats do carry and can transmit bacteria that lead to pneumonia in wild sheep.

Objective 55: Initiate assessment of the genetic diversity of, and genetic relatedness among Washington’s bighorn sheep herds, and, if necessary, develop strategies to maximize bighorn herds’ abilities to respond adaptively to future environmental stressors (Hogg et al. 2006; Luikart et al. 2008, 2010; Rioux-Paquette et al. 2010, 2011).

WDFW RESPONSE

Thank you for your comment. Archeological evidence suggests that Moses Coulee historically supported big horn sheep (Johnson 1983).

They should be reintroduced in the Pasayten as this looks like ideal habitat.

Thank you for your comment. There are plans for these herds that date from 1995. However, much has changed since that time, thus a renewed focus on these herds is required.

Objective 54: Evaluate the status of small, isolated bighorn herds in the northeastern part of the state (Hall Mountain and Vulcan Mountain), and formulate a long-term strategy for their management.

WDFW RESPONSE

Good but leave them alone

Thank you for your comment. Strategy 54 b: Test captured animals in Vulcano Mountain for disease, and equip a sample of animals with GPS collars to examine habitat relations relative to increasing human development. Strategy 54 c: Explore feasibility and desirability of using Hall Mountain animals to supplement any small, disease-free herds of Rocky Mountain bighorn sheep within Washington.

Great!

Thank you for your comment.
Objective 60: Provide recreational hunting season opportunities for individual bighorn sheep herds using harvest strategies that maintain demographic stability, typical breeding behavior, and minimize the probability of undesirable evolutionary consequences.

PUBLIC COMMENT

WDFW RESPONSE

Thank you for your comment. We occasionally encounter situations in which a herd is judged to be large enough that negative feedbacks occur, typically in the form of lack of forage or excessive movements into private lands or areas where the presence of domestic sheep cause disease risks. In order to reduce population size, the only feasible management options are harvesting or translocating females. Translocation is expensive, requires an appropriate recipient population, and cannot be conducted if there is uncertainty about the disease status of the abundant herd.

why should we translocate? (3 comments) OK

Thank you for your comment. We occasionally encounter situations in which a herd is judged to be large enough that negative feedbacks occur, typically in the form of lack of forage or excessive movements into private lands or areas where the presence of domestic sheep cause disease risks. In order to reduce population size, the only feasible management options are harvesting or translocating females. Translocation is expensive, requires an appropriate recipient population, and cannot be conducted if there is uncertainty about the disease status of the abundant herd.

If a ewe harvest doesn't count towards the once in a lifetime requirement (4 comments) Yes (9)

Thank you for your comment. The once-per-lifetime limitation does not apply to ewe harvests. Hunters who’ve harvested a ewe in the past are still eligible to draw a ram permit, and vice versa.

harvest? what are they a crop? this is the mind set an ignorant person.

Thank you for your comment. The term “harvest” is often used in a wildlife context. Similar terms include “yield”, “off-take”, and “sustainable use”.

Incorporate regulations to allow wolves, cougars, and other predators to keep sheep populations healthy by allowing them to feed on the sick and weak as nature intended. (4 comments) NO

Thank you for your comment. Guidelines used to limit hunting are designed to account for typical levels of predation.

when we know there is a sick herd in the Instantan lets take it let hunters pay to harvest not just let rot away (4 comments) YES

Thank you for your comment.

Agree. Also swakane can handle two permits a year. (1 comments) Agree

Thank you for your comment.

Objective 58: Monitor bighorn sheep herds bi-annually (or annually where justified) with sufficient precision that: i) declines driven either by disease events can be identified rapidly, ii) declines driven by other external factors or by overharvest can be identified within a 3-year period, and iii) increases sufficient to justify an increase in harvest opportunity can be identified within a 3-year period.

PUBLIC COMMENT

WDFW RESPONSE

Over harvest? with such limited draws. More die of disease than are harvested. (1 comments) No

Thank you for your comment. Your point is well taken: only under the most unusual circumstances would harvest primarily of rams be capable of causing a population reduction. In this context, the intent of “overharvest” was to refer to truncating the male age-structure more than desired. More precise wording will be used in the final plan.

Provide notification to drivers that bighorn sheep are on the roadways in a timely manner. For instance just out of Naches, WA bighorn come down to the road for salt at certain times of the year. No measures are taken by the Department to protect the animals or vehicles even though the Oak Creek game feeding station is near by and is manned. (3 comments) OK

Thank you for your comment. This suggestion will be forwarded to become considered as part of the ongoing 3-year package of hunting season recommendations.

Agree. Also swakane can handle two permits a year. (1 comments) Agree

Thank you for your comment.

Objective 59: Reduce to the degree feasible the probability of contact between bighorn sheep and domestic sheep and goats in all bighorn herds as well as in areas identified for repatriation of bighorn sheep.

PUBLIC COMMENT

WDFW RESPONSE

Yes. There needs to be some movement towards all domesticated animals removed off of state lands and forests. /yes, as stated earlier. remove all domestic sheep and goat grazing on public lands. (3 comments) Yes

Thank you for your comment. WDFW takes this issue seriously, and works with available models and maps to reduce the risk of contact between domestic sheep/goats and wild bighorns.

Again. Grazing sheep is the issue not pack goats. We could use heath checks a GPS requirement for Pack goats. I would love to opportunity to show my pack goat herd to wdfw and show that the chance of contact is more than minimal. (3 comments) Agree and “Strongly agree”

Thank you for your comment.

Initiate a plan to eliminate exotic big game animals such as the Ibex goats along the Columbia River near the Oregon border. (4 comments) Agree

Thank you for your comment.

Agree. Absolutely (1 comments) No

Thank you for your comment.

un-obtainable goal (2 comments) Yes (includes "Yup")

Thank you for your comment.
Incorporate regulations to allow wolves, cougars, and other predators to keep sheep populations healthy by allowing them to feed on the sick and weak as nature intended.

Hunting should be subordinate to species health.

10 comments Agree (includes "Good")
I agree with this objective.
4 comments No
2 comments Yes
1 comments OK
5 comments Agree (includes "Support")

Who in the heck lawyer wrote this question?
No
Not an effective way to manage the program
Thank you for your comment.

Objective 61:  Provide opportunity for auction tags and raffle tags in a manner that enhances predictability for both bighorn herd managers and the hunting public, while maintaining or increasing the desirability of these unique opportunities.

PUBLIC COMMENT
All auction tags should go directly to that species for any and all needed research, land acquisition etc. None of the $ should go to any general fund.

Already occurring and should not be expanded
Increase draw tag number and limit the amount of auction and raffle tags the majority of the public can't afford

6 similar comments No, equal opportunity, first come first served flat rate, anything else favors the rich.

YES -- but keep it limited so average guy has a chance too

(2 comments) No (includes "NO NO NO")
Agree (6 comments)
(4 comments) OK (includes "Support")
(14 comments) Yes

Objective 62: Account for all known bighorn sheep mortalities. Clarify rules and regulations to provide the department and the public with clarity regarding the possessing of bighorn skulls, heads, and horns.

WDFW RESPONSE
If we allowed for public to pick skulls from predator and water kills but required they be examined by regional biologists and pin. A better mortality survey can be done. Just make the penalty high for not having it checked and pinned.

Is it even possible to account for all mortalities.
Yes and data given. People who violate laws that protect the animals should suffer stiffer fines and loss of hunting privileges.

Most people know the rules already

(3 comments) OK
Should have already been done

(3 comments) OK

Objective 64: Revise existing goat management units to better reflect movement patterns, human access, and aerial survey units, while providing for close control of harvest and hunting recreational opportunity.

WDFW RESPONSE

Agree, especially in ONP where they are a problem
The map in the text does not have goats near Mt. St. Helens, where there are many.

I know very little on this matter. "Bad goats" and problems in the Olympics. Longstanding discussions about transplanting to the Cascades. Tribal issues I know exist, and challenges for the NPS and USFS.

Yes, but also be proactive
Not an effective way to manage the program

Thank you for your comment. WDFW agrees that it is not feasible to account for all mortalities; the Objective is to account for and document well known mortalities.

Thank you for your comment.

Thank you for your comment.

Guide used prohibitive

Prosecute poaching.

Yes and Indian harvest

(1 comments) Agree

Objective 65:  Continue opportunistic surveillance of mountain goats for bacterial pathogens that could cause disease and mortality in goats and/or in bighorn sheep should contact occur.

WDFW RESPONSE

Thank you for your comment. We acknowledge that the map in the Draft EIS is old and somewhat inaccurate. WDFW is working on developing a more accurate map.

Yes but also be proactive
Not an effective way to manage the program

Thank you for your comment.

WDFW RESPONSE

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.
Oh heck yes more scientists.

(14 comments) OK

Thank you for your comment.

Thank you for your comment. WDFW, working with a group of agency, university, and tribal stakeholders, has produced some preliminary analyses. These will be incorporated into the larger NEPA analyses conducted by Olympic National Park.

Yes as long as it does not impact existing hunting opportunities

Objective 66: Monitor abundance of mountain goats within management units supporting recreational harvest bi-annually (or annually where justified) with sufficient precision that declines driven by external factors or by overharvest can be identified within a 4-year period, and ii) increases sufficient to justify an increase in harvest opportunity can be identified within a 4-year period.

PUBLIC COMMENT

Thank you for your comment. WDFW currently conducts annual mountain goat surveys in most goat hunting units. The proposal here is to reduce the frequency of these monitoring flights so as to free some resources for surveying areas that are less-well understood.

Watch wives effect on mohew and chelan burds closely.

(14 comments) Yes

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Yes you don’t give out nearly enough tags for as many goats that are out there

Objective 67: Clarify the needs for recovery and/or augmentation of populations in the North Cascades by 2017. If the assessment (above) demonstrates a clear benefit to be gained from translocation, and mountain goats are available for such purposes, implement at least one translocation project (including monitoring capable of informing future projects) by 2020.

PUBLIC COMMENT

Thank you for your comment. Guidelines used to limit hunting are designed to account for typical levels of predation.

Watch wives effect on mohew and chelan burds closely.

Objective 68: Provide recreational hunting opportunities in individual mountain goat management areas at levels consistent with a stable or increasing population. In general, harvest of female goats (nannies) should be minimized to the degree possible, consistent with providing acceptable hunter opportunity.

PUBLIC COMMENT

Allocate tags based on the number of goats harvested each year. Billies = 1 goat, Nannies = 4 goats. Use this formula to promote harvesting of Billies. Have an orientation for each successful applicant.

Except in areas where they did not exist historically -- in those areas use liberal harvests

Work with other agencies to increase hunting opportunity where viable, especially where nonnative goats exist (which have cause negative encounters with humans).

Mountain goats should not be hunted in the state of Washington because of the current rapid population declines.

Thank you for your comment. Declines in mountain goat populations occurred during earlier decades, when over-harvesting was common. Currently, mountain goats are harvested according to conservative off-take allowances. The proposal here is to reduce the frequency of these monitoring flights so as to free some resources for surveying areas that are less-well understood.

WDFW RESPONSE

Objective 71: In support of the recovery of mountain goats in the North Cascades, hunting opportunities are likely to increase in the long-term. However, if ONP reduction results in translocation of mountain goats into native habitats in the North Cascades, hunting opportunities are likely to increase in the long-term.

Public Comment

Objective 65: Increase hunting opportunity for mountain goats on the Olympic Peninsula, east of Olympic National Park. These new hunts are not intended to be long-term sustainable; rather, they are designed to reduce conflicts with other recreationists in the area. If ONP ultimately reduces or eliminates mountain goats, this hunting opportunity will likely cease. However, if ONP reduction results in translocation of mountain goats into native habitats in the North Cascades, hunting opportunities are likely to increase in the long-term.

Public Comment

Thank you for your comment. Your suggestion is similar conceptually to a “points” system over-viewed in Strategy g. of this Objective. WDFW currently does not have a specific orientation or class for successful applicants, but does provide all with a brochure and video that provide training and testing for hunters’ ability to differentiate mountain goat gender in the field.

Thank you for your comment. Your suggestion is similar conceptually to a “points” system over-viewed in Strategy g. of this Objective. WDFW currently does not have a specific orientation or class for successful applicants, but does provide all with a brochure and video that provide training and testing for hunters’ ability to differentiate mountain goat gender in the field.
Incorporate regulations to allow wolves, cougars, and other predators to keep mountain goat populations healthy by allowing them to feed on the sick and weak as nature intended.

Thank you for your comment. Guidelines used to limit hunting are designed to account for typical levels of predation.

Nannies should only be harvested in over populated areas... Oh wait, there are no over populated areas.

Thank you for your comment. Strategy ‘g’ of Objective 68 is intended to further reduce harvest pressure on female goats while allowing existing levels of overall harvest to continue.

(2 comments) No harvest of ewe's. If there isn't a large enough population then don't hunt. Use common sense. (Includes "There is no reason for hunters to chase nannies")

Thank you very much for your comment. Strategy ‘g’ of Objective 68 is intended to further reduce harvest pressure on female goats while allowing existing levels of overall harvest to continue.

Not an obtainable objective for this species.

Thank you for your comment.

1 comment) OK

Thank you for your comment.

on a year to year basis

Thank you for your comment.

Open areas between mt rainier and I-90

Thank you for your comment.

Support

Thank you for your comment.

why

Thank you for your comment.

(12 comments) Yes

Thank you for your comment.

Yes you should've been doing this all along

Thank you for your comment.

(7 comments) Agree

Thank you for your comment.

Hunting will be needed. I leave it to managers how to manage.

Thank you for your comment.

(3 comments) NO

Thank you for your comment.

Objective 69: Provide opportunity for auction tags and raffle tags in a manner that enhances predictability for both mountain goat herd managers and the hunting public, while maintaining or increasing the desirability of these unique opportunities.

PUBLIC COMMENT

Already being done and should not be expanded.

Thank you for your comment. This Objective and associated Strategy do not envision or recommend expanding the number of auction or raffle tags for mountain goats. Rather, they are intended to provide additional tools to biologists in fine-tuning the number of goats removed from each herd, while providing additional predictability and geographic scope to the few hunters with these tags.

more permit

Thank you for your comment. This Objective and associated Strategy do not envision or recommend expanding the number of auction or raffle tags for mountain goats. Rather, they are intended to provide additional tools to biologists in fine-tuning the number of goats removed from each herd, while providing additional predictability and geographic scope to the few hunters with these tags.

only a few - leave opportunities for average guy

Thank you for your comment. Almost 85% of available permits for mountain goats over the past decade have been regular draw permits (as opposed to auction or raffle permits). Most of the funds available for surveys, research, efforts to reduce disease risk, planning for future restoration, and other management efforts on behalf of mountain goats have, during the same period, derived from auction or raffle permits.

Out of State tags should be minimal.

Thank you for your comment. WDFW does not allocate or limit the number of tags going to hunters from other states or jurisdictions. In recent years, >90% of mountain goat hunters in Washington have been residents.

(5 comments) No, this just feeds the rich get richer mentality. Open more permits for draw.

(thanks includes "auction if just for the rich", "highly discriminatory against the average hunter", "no more auction and raffle tags, quit managing just to make more money. Hunting does not need to be a rich man's sport!!", and "Raffle and auction tags are a slap in the face of "average" hunters. All those tags should go into the drawings. Our resources are ours not the highest bidders. WDFW should be ashamed of this behavior.")

Thank you for your comment. Almost 85% of available permits for mountain goats over the past decade have been regular draw permits (as opposed to auction or raffle permits). Most of the funds available for surveys, research, efforts to reduce disease risk, planning for future restoration, and other management efforts on behalf of mountain goats have, during the same period, derived from auction or raffle permits.

No, have flat rate, first come first served, no pre-orders, no guides, no online ordering. Auctions and raffles cater to the wealthy.

Thank you for your comment. Almost 85% of available permits for mountain goats over the past decade have been regular draw permits (as opposed to auction or raffle permits). Most of the funds available for surveys, research, efforts to reduce disease risk, planning for future restoration, and other management efforts on behalf of mountain goats have, during the same period, derived from auction or raffle permits.

Of course wherever you can make more money.

Thank you for your comment.

(3 comments) OK

Thank you for your comment.

Okay. Make some money to help cover management.

Thank you for your comment.

Support

Thank you for your comment.

(18 comments) Yes

Thank you for your comment.

(6 comments) Agree

Thank you for your comment.

(5 comments) No (Includes "NO NO NO")

Thank you for your comment.

Objective 70: Reduce the potential for mountain goat/human conflict through decreasing the incidence of habituated and/or conditioned goats, as well as the intensity of habituation/condition of individual goats that frequent heavily used recreation areas.

PUBLIC COMMENT

Reduce the potential for conflict by educating recreating public of the dangers of interacting with wildlife.

Thank you very much for your suggestion. WDFW is considering the logistics and feasibility of similar proposals.

Consider transplanting to different area of state.

Thank you very much for your comment. It would be difficult and expensive to identify, capture, and relocate specific individual mountain goats.

(2 comments) Habituated goats should be eliminated by hunters. Durt and tag such goats so that they can be easily identified during hunting season and open a season on those tagged goats. Problem goats should be a focused hunter removal opportunity

Thank you very much for your comment. WDFW re-opened hunting opportunities for mountain goats on the Olympic Peninsula, east of Olympic National Park. These new hunts are not intended to be long-term sustainable; rather, they are designed to reduce conflicts with other recreationists in the area.

(2 comments) shoot em (includes "hunt them")

Thank you very much for your comment. In 2014, WDFW re-opened hunting opportunities for mountain goats on the Olympic Peninsula, east of Olympic National Park. These new hunts are not intended to be long-term sustainable; rather, they are designed to reduce conflicts with other recreationists in the area.

(6 responses) No

Thank you for your comment.

(6 comments) OK (includes "Support")

Thank you for your comment.

Sure. Been successful with bears, so why not goats.

Thank you for your comment.

(9 comments) Yes

Thank you for your comment.

good.

Thank you for your comment.

7 comments) Agree

Thank you for your comment.

Objective 71: Ensure that moose habitat requirements are incorporated into land-use planning and practices.

PUBLIC COMMENT

(3 comments) Habitat is the key.

Thank you for your comment.

This is a very high priority.

Thank you for your comment.

(4 comments) OK

Thank you for your comment.

Support

Thank you for your comment.

NO

Thank you for your comment.
<table>
<thead>
<tr>
<th>Objective 72: Produce a statistically-valid estimate of moose abundance within moose habitats in Districts 1 and 2 (Ferry, Pend Oreille, Spokane, and Stevens counties) by 2017.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Would think we have an estimate now. Big question is what effect wolves will have on animals</td>
</tr>
<tr>
<td>Make sure to also research the number of Moose that are mysteriously dying, in GMUs 113 and 117. The last two years, I've come across MANY dead moose, with little or no signs of trauma. Disease? Ticks?</td>
</tr>
<tr>
<td>why as long you know they are there</td>
</tr>
<tr>
<td>With.out guessing....</td>
</tr>
<tr>
<td>Don't have to worry wolves have wiped out most of the moose.</td>
</tr>
</tbody>
</table>

| **WDFW RESPONSE** |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |

<table>
<thead>
<tr>
<th>Objective 73: Develop alternative approaches to population assessment that do not require annual helicopter surveys for estimating moose population trends by 2021.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>(2 comments) Hunter input (includes &quot;Yes, ask the locals&quot;)</td>
</tr>
<tr>
<td>(4 comments) Consider the use of drones of various type for survey purposes. These would be more cost effective and safer plus could provide better data if properly equipped and operated. The use of this type of tool should also be considered by the Department for other types of surveys. (includes similar comments)</td>
</tr>
<tr>
<td>Junks very burn more money to see wolf killed moose.</td>
</tr>
<tr>
<td>Heli.copter is probably the best tool.</td>
</tr>
<tr>
<td>Need to keep closet eye on them</td>
</tr>
<tr>
<td>(1 comment) No</td>
</tr>
<tr>
<td>(3 comments) OK</td>
</tr>
<tr>
<td>Should have already been done</td>
</tr>
<tr>
<td>Helicopter is probably the best tool.</td>
</tr>
<tr>
<td>Need to keep closet eye on them</td>
</tr>
<tr>
<td>(4 comments) Agree</td>
</tr>
</tbody>
</table>

| **WDFW RESPONSE** |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |

<table>
<thead>
<tr>
<th>Objective 74: Obtain initial, rough estimates of abundance and population trend in District 3 (Region 1), and District 6 and 7 (Region 2) by 2019.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Do you want to know how many there are or are you thinking just another area we have to cover. rough draft work you know now roughly how many</td>
</tr>
<tr>
<td>(3 comments) Agree</td>
</tr>
<tr>
<td>(2 comments) No</td>
</tr>
<tr>
<td>(4 comments) OK</td>
</tr>
<tr>
<td>Should have already been done</td>
</tr>
</tbody>
</table>

| **WDFW RESPONSE** |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |

<table>
<thead>
<tr>
<th>Objective 75: Monitor the effects of diseases and parasites on moose populations by surveillance of samples provided by hunters as well as opportunistically obtained carcasses.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Analyze the impacts of global climate change re: parasites</td>
</tr>
<tr>
<td>(3 comments) Text does not talk about tapeworm infectious but have personally seen this in two Washington moose and one mule deer. (includes &quot;Wolf disease is going to take care of the moose,&quot; and &quot;especially wolf introduce tapeworms&quot;).</td>
</tr>
<tr>
<td>Game Checks</td>
</tr>
<tr>
<td>I understand that it's difficult to do a Post-Mortem on a discovered dead Moose, unless you're able to do it within a few hours, due to the body heat. However, something needs to be figured out. Too many moose have been found, dead, in GMUs 113 and 117, the past two years.</td>
</tr>
</tbody>
</table>

| **WDFW RESPONSE** |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |

<table>
<thead>
<tr>
<th>Objective 76: Monitor changes in the geographic distribution of moose throughout Washington.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>(2 comments) Yes add moose to cascade range in western Washington</td>
</tr>
<tr>
<td>Hunter input</td>
</tr>
</tbody>
</table>

| **WDFW RESPONSE** |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |
| Thank you for your comment. |

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242
<table>
<thead>
<tr>
<th>Objective 77: Minimize risks to human safety and property by managing moose conflicts at the wildland-human interface.</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interface areas with moose conflicts should be handled by hunters.</td>
<td>Thank you for your comment. WDFW does have a program in which Master Hunters are occasionally called on to remove problem animals. The decisions about when this option can be used are made by the Enforcement Division. In recent years, relatively few cases have been deemed appropriate for Master Hunter participation.</td>
</tr>
<tr>
<td>Minimize the &quot;wildland-human interface&quot; also through development regulations.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Well, they're in my yard every winter but, they were here first. yes, but give benefit of doubt to the moose. Houses out in the forest or rangeland are out of place and wildlife should not be controlled to accommodate such housing sprawl.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Population control.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(11 comments) Yes.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>again low.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(5 comments) Agree.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(3 comments) No.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(4 comments) OK.</td>
<td>Thank you for your comment.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective 80: Communicate with owners of private lands on which small groups of pronghorns have been documented, to understand the degree to which pronghorns present a conflict to agricultural interests.</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>(19 comments) Yes (includes &quot;Support&quot; and &quot;Sure why not&quot;).</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>NO.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(6 comments) Agree.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(3 comments) OK.</td>
<td>Thank you for your comment.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective 81: Keep current on the status of small, fragmented populations of pronghorns in Washington by keeping a database of reports obtained from the public and agency sources.</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes -- or be more proactive in monitoring.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(6 comments) Agree.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>make numbers public.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>No (2 responses).</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(7 comments) OK (includes &quot;Support&quot;)</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(14 comments) Yes.</td>
<td>Thank you for your comment.</td>
</tr>
</tbody>
</table>
A tribal issue (2 responses)

Objective 82: As time and funding permits, work with private parties prepared to take the lead in reintroducing pronghorns to investigate the biological, social, and economic feasibility of specific proposals.

WDFW RESPONSE

Thank you for your comment.

(2 comments) 2000

get rid of "as time and funding permits". no other objective has that but it is basically assumed

Thank you for your comment.

5 comments - Re-introduction of Pronghorns where feasible & viable is a must. (includes other comments, such as "Should have already been done."). "Support!!! Yes, we should have tons of speed goats!!!" "This should be a high priority on the list. We reintroduce predators to the state we should also reintroduce the pronghorn as well.")

WDFW views pronghorns as a native and desirable species. However, their historical scarcity and the fact that no dedicated funding sources exist to support their management combine to prevent this objective from being a high priority.

(14 comments) 3000

Brian to help educate us on some of these.

Thank you very much for your comment. WDFW views pronghorns as a native and desirable species. However, their historical scarcity and the fact that no dedicated funding sources exist to support their management combine to prevent this objective from being a high priority.

Yes, we have lots of habitat for these animals.

Thank you for your comment.

(1 comment) Yes.

again what is the cost of farmers crops damaged

Thank you for your comment.

(1 comment) Agree.

I support efforts to restore/reintroduce pronghorns in Washington State.

Thank you for your comment.

No.

Thank you for your comment.

Agree.

Thank you for your comment.

I'd like spring bear permits available in nearly every GMU. Even if it's only five or ten. This would not give accurate information needed for the entire state.

Thank you for your comment. The Department is unable to estimate bear density in all areas of Washington due to cost and logistic limitations. However, with a west-side and east-side study area, the Department may be able to extrapolate to most areas of Washington.

I think some of your other Objectives had this same theme as it's a hot-button issue with some hunters and public today. Some friends in the Legislature have reached out to the SFLO community to help brainstorm some win-win solutions. Heather will be coordinating our most creative idea's in coming up with a carrot rather than a stick for management tools.

Thank you for your comment.

Would not give accurate information needed for the entire state.

Thank you for your comment. The Department is unable to estimate bear density in all areas of Washington due to cost and logistic limitations. However, with a west-side and east-side study area, the Department may be able to extrapolate to most areas of Washington.

Get a handle on poaching by local and international poachers.

The Department has increased emphasis on monitoring bear poaching levels due to the illegal commercialization of bear parts.

Thank you for your comment.

What lawyer wrote this one. Don't you get hunter reports back on hunter success. No More Studies.

Thank you for your comment. The Department believes understanding the relative abundance of bears is important for managing bears as a hunted species. The Department is mandated by state law to maximize recreational opportunities, including hunting, for game species without impacting the long-term sustainability of the species.

Objective 84: Provide recreational hunting opportunities while at the same time maintaining a sustainable bear population in each BBMU.

WDFW RESPONSE

(28 comments) Agree.

Get rid of "as time and funding permits". no other objective has that but it is basically assumed

Thank you for your comment.

Good luck. Populations are too high in the westside. Hunting them is pure luck without bait or hounds.

Thank you for your comment. Using bait to hunt black bears was banned by voter initiative.

(2 comments) In all areas of Washington.

Thank you for your comment. The Department is unable to estimate bear density in all areas of Washington due to cost and logistic limitations. However, with a west-side and east-side study area, the Department may be able to extrapolate to most areas of Washington.

NO.

Thank you for your comment.

Allow hunting so he hunter and see if its a lactating female or if she has cubs.

Thank you for your comment. Using bait to hunt black bears was banned by voter initiative.

Bear hunting needs to be stopped- apex predators need to be preserved. In addition these non-human animals are sentient beings. They experience familial caring, grief, fear. Killing them is unethical and borders on sociopathy.

Thank you for your comment. The Department is mandated by state law to maximize recreational opportunities, including hunting, for game species without impacting the long-term sustainability of the species.

(2 comments) Disagree.

Get a handle on poaching by local and international poachers.

The Department has increased emphasis on monitoring bear poaching levels due to the illegal commercialization of bear parts.

Thank you for your comment.

I think something of your other Objectives had this same theme as it's a hot-button issue with some hunters and public today. Some friends in the Legislature have reached out to the SFLO community to help brainstorm some win-win solutions. Heather will be coordinating our most creative idea's in coming up with a carrot rather than a stick for management tools.

Thank you for your comment.

If like spring bear permits available in nearly every GMU. Even it's only five or ten. This would provide a lot more opportunity for hunters who support the WDFW with license and tag purchases. I apply for the point option in the spring bear permits every year because there are no decent units to apply for near where I live. It used to be there was the Capitol Peak spring bear permit but that was taken away for apparently no reason. There are lots of bears in that GMU and it could easily support at least 25 or 30 permits each spring. Many other GMU's could also support spring permits. The WDFW would sell more applications if there were more units with spring bear permits available. I'd also like to see baiting be allowed for these spring permit hunts.

One of the issues of spring bear seasons in orphaning bear cubs. As such, the department tend to provide spring bear seasons when there is a clear management objective that spring seasons are ideal for addressing, such as bear damage to trees in spring and nuisance bear activity in spring. To minimize cub orphaning the department requires specialized hunter training and often limits the hunt areas to specific areas. This level of coordination is not logistically feasible of spring seasons where offered in all GMUs.

Increase bear populations and create more opportunities for ecotourism.

Thank you for your comment. Washington currently has an abundant and healthy bear population and is not directing management toward elevating bear densities beyond carrying capacity.

It is not the "Opportunity" that is lacking - it is the TOOLS to be successful.

Thank you for your comment.

killing as recreation, wow what a relaxing beautiful activity.

Thank you for your comment.

Limit or eliminate bear damage permits, esp. in areas where licensed hunters are restricted.

Thank you for your comment. The Department is actively working with landowners to enhance hunter access in areas where hunters participate in damage related seasons.

Male bears only to be harvested.

Thank you for your comment. The Department closely monitors male and female harvest to prevent over-harvest of either sex.

No one should be hunting bears. A human attacked by a bear should have the right of defense, but

Thank you for your comment. The Department is mandated by state law to maximize
the predation effect is depensatory, causing a greater proportional loss and more rapid decline on communities.

We should have a statewide spring bear hunt to help control the population. If there are only a certain number of bears to harvest per unit establish a quota that once it has been reached in that unit the hunt is closed for the spring. The bear population is extremely high especially in parts of the state and those bears are taking their toll on everything around them from deer and elk to trees. So why not establish a general spring bear hunt and increase license sales at the same time help control the bear populations since we are unable to use hounds or bait to hunt them.

You need to maintain the bear depredation hunts to reduce damage to private forests.

Impacts to black bear populations and other native wildlife. The harvested bear populations are consistent with long-term sustainability. The corresponding bear population should remain at or near current levels and it is unlikely it will result in greater impacts to other wildlife species (i.e., deer and elk) or habitat communities. Not necessarily true, especially if deer and elk are declining. As ungulate numbers decline the predation effect is depensatory, causing a greater proportional loss and more rapid decline on ungulates despite stable bear numbers, so there could be an impact. It could be argued that there are too many or too few bears at the current level and the baseline population size for long-term sustainability needs to be adjusted. Maybe the population research will provide some insight here.

Black bear harvest impacts on native species. The public has voiced concern about potential impacts of black bear-hunting on grizzly bears. With the prohibition on the use of dogs and bait for recreational hunting of bears, potential impacts to grizzly bears were greatly reduced.

The logic of this argument seems flawed. Bow hunters may be more likely to accidentally shoot grizzly bears on the run than under more controlled situations of hunting bear and with dogs. Is there scientific evidence to support a ban on hounds and bait for black bear hunting to protect grizzlies? If not, then this is likely an opinion and not necessarily a factual statement.

Objective 85: Minimize negative human-bear interactions so that the "number of negative interactions per capita" is constant or declining over the term of this plan.

PL:

- Timber Damage
  - The objective and associated strategies are articulated much better than under Objective 23 (pages 41-42). We feel that it is redundant to have 2 similar objectives and recommend removing Objective 85 from the black bear section. However, we recommend that Objective 23 be changed to reflect our specific comments and the language contained in the existing Objective 85.

- Impacts to black bear populations and other native wildlife. The harvest guidelines above favor a stable and healthy bear population and are consistent with long-term sustainability. The corresponding bear population should remain at or near current levels and it is unlikely it will result in greater impacts to other wildlife species (i.e., deer and elk) or habitat communities. Not necessarily true, especially if deer and elk are declining. As ungulate numbers decline the predation effect is depensatory, causing a greater proportional loss and more rapid decline on ungulates despite stable bear numbers, so there could be an impact. It could be argued that there are too many or too few bears at the current level and the baseline population size for long-term sustainability needs to be adjusted. Maybe the population research will provide some insight here.

- Black bear harvest impacts on native species. The public has voiced concern about potential impacts of black bear-hunting on grizzly bears. With the prohibition on the use of dogs and bait for recreational hunting of bears, potential impacts to grizzly bears were greatly reduced.

- Bear interaction is caused because of human intrusion into their space and degradation of their space to the human wants and desires - ie, needs. If you build in the bears neighborhood his rules prevail - NOT yours - ie humans.

- Bear educational messages targeted residents in the human-wildlife interface.

- Seatur was here first - We should have a statewide spring bear hunt to help control the population. If there are only a certain number of bears to harvest per unit establish a quota that once it has been reached in that unit the hunt is closed for the spring. The bear population is extremely high especially in parts of the state and those bears are taking their toll on everything around them from deer and elk to trees. So why not establish a general spring bear hunt and increase license sales at the same time help control the bear populations since we are unable to use hounds or bait to hunt them.

- You need to maintain the bear depredation hunts to reduce damage to private forests.

- Impacts to black bear populations and other native wildlife. The harvest guidelines above favor a stable and healthy bear population and are consistent with long-term sustainability. The corresponding bear population should remain at or near current levels and it is unlikely it will result in greater impacts to other wildlife species (i.e., deer and elk) or habitat communities. Not necessarily true, especially if deer and elk are declining. As ungulate numbers decline the predation effect is depensatory, causing a greater proportional loss and more rapid decline on ungulates despite stable bear numbers, so there could be an impact. It could be argued that there are too many or too few bears at the current level and the baseline population size for long-term sustainability needs to be adjusted. Maybe the population research will provide some insight here.

- Black bear harvest impacts on native species. The public has voiced concern about potential impacts of black bear-hunting on grizzly bears. With the prohibition on the use of dogs and bait for recreational hunting of bears, potential impacts to grizzly bears were greatly reduced.

- The logic of this argument seems flawed. Bow hunters may be more likely to accidentally shoot grizzly bears on the run than under more controlled situations of hunting bear and with dogs. Is there scientific evidence to support a ban on hounds and bait for black bear hunting to protect grizzlies? If not, then this is likely an opinion and not necessarily a factual statement.

WDFW RESPONSE

- Thank you for your comment. The Department will continue to monitor bear populations and harvest levels, as well as ungulate populations. If there is evidence that bear depredation is limiting an ungulate population reaching population objectives, the department may initiate target bear removal (see predator-prey guidelines in Chapter 2).

- Thank you for your comment. Based on past experiences in Washington, and with the black bear-grizzly bear ID test, the Department does not anticipate impacts to grizzly bears.

- Thank you for your comment. The Department plans to continue addressing tree damage through non-lethal actions, and lethal actions as warranted.

- Thank you for your comment. The Department will continue to monitor bear depredation is limiting an ungulate population reaching population objectives, the department may initiate target bear removal (see predator-prey guidelines in Chapter 2).

- Thank you for your comment. Using bait to hunt black bears was banned by voter initiative.

- Thank you for your comment. Using bait to hunt black bears was banned by voter initiative.

- Thank you for your comment. The Department includes “living in bear country” in the bear educational messages targeted residents in the human-wildlife interface.

- Thank you for your comment. The Department now has the authority to fine individuals that attract bears and create problem situations.

- Thank you for your comment. These and more “best management practices” are include in our messaging in bear education materials.

- Thank you for your comment. The Department routinely provides education materials to Washington residents and is initiating a “Be Bear Aware” education project in key communities.

- Thank you for your comment. The Department routinely provides education materials to Washington residents and is initiating a “Be Bear Aware” education project in key communities.

- Thank you for your comment. The Department attempts to minimize human-bear interactions through a variety of actions, including outreach and education, non-lethal methods (capture-move, hazing, etc.), and lethal removal of problem bears.

- Thank you for your comment. Minimizing human-bear conflict is a high priority for the Department.
<table>
<thead>
<tr>
<th>Objective 86. Develop programs with informational materials to help timber owners with: valid and anticipating bear damage; use of non-lethal methods to avoid damage; and lethal removal options. Develop a minimum of one of these programs each year beginning in 2015.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Agreed, as warned that scars bell out of anyone trying to protect their crops regardless of what is meant by this language, the message received will at least partially exasperate landowners fears that WDFW is continuing headlong on a pathway to eliminate the only effective damage control tools we have - before truly effective (or reimbursement) alternatives are in place. Although I very much doubt any small or large forestland owners want to get bear depredation permits just because they, or their friends, want to go hunting I do understand the idea to validate damage at least on the initial request. However, as noted above because of the financial significance of bear damage over short periods of time and particularly the potential for catastrophic effects on small parcels the permits should be issued automatically with &quot;validation&quot; to follow rather than waiting for staff to make a site visit. We all have our &quot;Nero fiddled while Rome burned&quot; stories that are not conducive to better relationships. Likely unintentional, but as worded this feeds into landowner perceptions that the regulatory processes (often FUBAR) of the past will be even more of an obstacle to keeping our forests forested in the future. At a minimum, those landowners who have clearly established recent and on-going damage (validated &quot;hotspots&quot;) should be held to much higher levels of trust with more readily available, longer, and unfettered depredation permits (at least until potential alternative &quot;non-lethal methods&quot; are proven to be effective) than truly true partnerships are exist and thrive. Our (SFLOs) Howard Wilson is collecting a list of process recommendations (for next year) intended to build on a more positive relationship between SFLOs and WDFW that builds on your dept's positive responsiveness to our concerns with this year's process.</td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>Thank you for your comment. The Department is actively working with landowners to improve the existing programs to better understand the impacts and identify areas where improvements can be made to enhance WDFW's ability to assist timber owners.</td>
</tr>
<tr>
<td>Developed programs with informational materials to help timber owners with: valid and anticipating bear damage; use of non-lethal methods to avoid damage; and lethal removal options. Develop a minimum of one of these programs each year beginning in 2015.</td>
</tr>
<tr>
<td>This is a better stated objective and strategies than Objective 23. Is the redundancy necessary?</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(23 comments) Agree</td>
</tr>
<tr>
<td>Already exists</td>
</tr>
<tr>
<td>This a is a high priority</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>bears were here first</td>
</tr>
<tr>
<td>Thak you for your comment.</td>
</tr>
<tr>
<td>don't see the problem maybe more reports on the cost of this</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Eliminate this program completely. Timber companies do not need any help, they have ruined enough in this state.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>emphasise non-lethal management.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Follow the money (international timber interests) and kill the bears for doing what comes naturally.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Forget the lethal options. Learn to live with the inevitable side effect of wildlife.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>give out special permits to control bear population by allowing to bait bears with sealed barrels</td>
</tr>
<tr>
<td>Thank you for your comment. Using bait to hunt black bears was banned by voter initiative.</td>
</tr>
<tr>
<td>Help no timber owners unless they open their land to hunting and retreat fees. Help only those who allow hunting without fees, like Green Diamond.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>I agree with this objective.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>I wonder how this will work.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>If a timber company is not allowing free access for bear hunters, they should not be given damage permits.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Let the timber owners pay for it themselves.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Lure the timber companies that allow free access for licensed hunters during bear season. bear damage is one item of leverage the WDFW has with big timber and you are wasting it and wasting bears.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(2 comments) NO</td>
</tr>
<tr>
<td>Non lethal methods should be prioritized, too many of these animals are taken in the necessary evils of hunting and from lethal action on behalf of the dept. of wildlife. Timber damage should not warrant lethal action.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Non-lethal methods need to be the first line of defense and should be promoted over the lethal options. People need to learn how to live with wild animals if they live in the wild animals' home.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>or just harvest the bears if there are too many which is what is sounds like.</td>
</tr>
<tr>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(5 comments) NO</td>
</tr>
<tr>
<td>actions, including: outreach and education, non-lethal methods (capture-move, hazing, etc.), and lethal removal of problem bears.</td>
</tr>
<tr>
<td>Thank you for your comment. Minimizing human-bear conflict is a high priority for the Department.</td>
</tr>
<tr>
<td>Not a goal this objective can reach with human expansion in to rural area</td>
</tr>
<tr>
<td>Thank you for your comment. Minimizing human-bear conflict is a high priority for the Department.</td>
</tr>
<tr>
<td>This is an admirable objective but without the method is important; how is this realistic for example if humans continue to take more wild lands from bears and other animals?</td>
</tr>
<tr>
<td>The Department attempts to minimize human-bear interactions through a variety of actions, including: outreach and education, non-lethal methods (capture-move, hazing, etc.), and lethal removal of problem bears.</td>
</tr>
<tr>
<td>This is an area that needs revision. There appears to be an increase in the number of lethal removal permits issued since this area of wildlife management was removed from Enforcement. A sad day for bears and the public.</td>
</tr>
<tr>
<td>Thank you for your comment. The level of lethal removal of bears is strongly influenced by environmental conditions. In periods with low food abundance, human-bear conflict typically increases.</td>
</tr>
<tr>
<td>Train idiot humans how to avoid interactions. It's not that hard.</td>
</tr>
<tr>
<td>The Department attempts to minimize human-bear interactions through a variety of actions, including: outreach and education, non-lethal methods (capture-move, hazing, etc.), and lethal removal of problem bears.</td>
</tr>
<tr>
<td>Unrealistic goal. You may be in control of some variables, but not the human variable, this goal will never be reached.</td>
</tr>
<tr>
<td>Thank you for your comment. The Department has a score-card system to evaluate if the goal is met or with reason of being attainable. Our past data suggests this is a reasonable objective.</td>
</tr>
<tr>
<td>Objective 87: Evaluate and update cougar PMUs by 2015.</td>
</tr>
<tr>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Is the discussion on prey impacts on cougar the statement &quot;The current population levels for deer and elk populations are compatible with the cougar population objectives for each PMU&quot;. It would seem this may be true, but considering that Objective 87 has not been completed at this point it is not a fact. Particularly, as for many ungulates mentioned in this plan, there is no current estimate of population size.</td>
</tr>
<tr>
<td>Impacts Despite the outlined procedure for manipulating predators to recover prey in Chapter 2, it is unlikely it will occur because the procedures seem very difficult to document to everyone's satisfaction. There needs to be more flexibility, accommodate some uncertainty, and incorporate adaptive approaches to truly successfully implement the action.</td>
</tr>
<tr>
<td>Were pleased to see prey availability finally enter into the equation of predicting potential cougar numbers (Strategy a). Hopefully, this means that the current estimate is replaced with an estimate of the number of cougar the prey can support considering hunter harvest (RCW 77.04.012). We note that this objective is scheduled to be completed by 2015. We feel this highly unlikely to occur as there is a need to gather more information on many species of ungulates in the GMP to have any idea on how to rectify prey and cougar numbers.</td>
</tr>
<tr>
<td>Objective 87: Strategy a. Evaluate cougar PMUs based on habitat use, prey availability, and human activities.</td>
</tr>
<tr>
<td>Good, let's hope prey availability really does enter into the equation of predicting potential cougar numbers and a simple density estimate is replaced in favor of actual potential number of cougar the prey can support considering hunter harvest and other needs (RCW 77.04.012 &quot;the commission shall attempt to maximize the public recreational hunting opportunities of all citizens...&quot;). We challenge the WDFW to model prey numbers and cougar kill rates to estimate the acceptable number of cougar to also meet prey species objectives and hunting.</td>
</tr>
<tr>
<td>The &quot;Population Objectives&quot; issue statement states that &quot;...recent analysis comparing number of complaints and previous year's harvest levels suggests that harvest at levels below 24% of the estimated population had no effect on reducing the overall number of cougar-human conflicts&quot;. The following Objective 88 states &quot;Manage for a stable cougar population in each PMU (see exceptions)&quot;. The plan should identify here how objective 88 deals with the conflict issue statement, and why the state would not increase harvest to above 24% of the estimated population had no effect on reducing the overall number of cougar-human conflicts.</td>
</tr>
<tr>
<td>(27 comments) Agree</td>
</tr>
<tr>
<td>Bring back dogs and go back to permit draw only</td>
</tr>
<tr>
<td>Cougars self-manage their own populations. There is no need for hunting cougars. Follow science-based studies. See studies done in California.</td>
</tr>
<tr>
<td>Kill more cougars.</td>
</tr>
</tbody>
</table>

Thank you for your comment. The department plans to emphasize the use of education and non-lethal measures, lethal removal will likely continue to be needed as a last resort for chronic areas.
The goal should be reworded to state:

What is really meant by "healthy, productive population"? Does this mean a specific number of cougar because they respond far more to prey than vegetation. vegetation and landscape characteristics then it will be futile to manage these directly for term limiting effects. Habitat, if it is defined by specific vegetation and landscape characteristics, does not limit local cougar population size.

Through this behavioral-based organization, cougar population size is limited by the available habitat. Not sure what is really meant by this statement, and what scale it refers to. What really is "available habitat" for cougar? Prey availability and human removals would limit the distribution and number of cougar over the whole state. Locally, it would appear that cougar numbers, at least adult males, are limited, maybe regulated, by social tolerance. Human harvest and inaspecific mortality most certainly limits the number of adults. Diseases may have short-term limiting effects. Habitat, if it is defined by specific vegetation and landscape characteristics, does not limit local cougar population size.

7. Prescribe, protect, perpetuate, and manage cougar and their habitats to ensure healthy, productive populations.

What is a healthy, productive population? It appears from the information provided that maintaining the currently estimated population is the goal, but this doesn't reflect effects on their prey that may already be sustainable population.

Preserve, protect, perpetuate, and manage cougar and their habitats to ensure healthy, productive populations

The goal of a healthy, productive population can only be met where the prey base is adequate to support the whole suite of predators and other mortality factors acting upon it. You cannot decouple trophic levels and achieve the desired goal. You cannot manage for stable cougar if they are negatively affecting their "habitat", i.e., prey. If habitat is intended to be specific vegetation and landscape characteristics then it will be futile to manage these directly for cougar because they respond far more to prey than vegetation.

What is really meant by "healthy, productive population"? Does this mean a specific number of cougar, a targeted recruitment level, a number that does not impact its food resource, i.e., "habitat", or targeted harvest?

The goal should be reworded to state: Preserved, protect, perpetuate, and manage cougar and their prey habitats, and human hunting of cougar prey, to ensure a reasonable, but not excessive, sustainable cougar population.

The statewide goals for cougar are:
1. Preserve, protect, perpetuate, and manage cougar and their habitats to ensure healthy, productive populations
We do not agree with the undefined terms "healthy or productive populations". We believe the WDFW should approach cougar management like this: “Management of predators to conserve the wildlife in a manner that does not impair the resource while maximizing the public recreation - providing hunting opportunities for all citizens.”

2. Minimize human/cougar conflict
This should also include minimizing cougar/livestock conflicts and cougar/pet conflicts.

3. Manage cougar for a variety of recreational, educational and aesthetic purposes including hunting, scientific study, and cultural and ceremonial uses by Native Americans, wildlife viewing, and photography

This is a legislative requirement but the main emphasis should be: "Management of predators to conserve the wildlife in a manner that does not impair the resource while maximizing the public recreation - providing hunting opportunities for all citizens".

4. Manage statewide cougar populations for a sustained yield
For sustained yield of what? The term sustained yield is not numerically defined in this document. Should state "Manage cougar populations at a level that ensures their viability but is in balance with available prey, and human needs from hunting." We assume that sustained yield means maintaining the cougar population at its current level. What is not agreed upon is the baseline for cougar populations in Washington, maintaining them at a level 25% lower than the current population would still provide a sustained yield. The yield may be higher initially, then lower once the objective is reached.

5. Improve our understanding of predator-prey relationships
With improved understanding of predator/prey relationships we would assume that the WDFW would manage predators & prey at an optimum level as per WDFW Legislative Mandate.

1. POPULATION STATUS AND TREND (page 104)
Except for females with kittens, cougars are solitary the majority of their life, making it difficult to accurately estimate statewide cougar populations. However, based on densities from six long-term research studies in Washington over a 13-year period the Department has obtained credible information to estimate the adult (>24 months of age) cougar population size. The Department concurs that this is tied to prey. However, the department believes that there is ample prey available for cougar populations, so prey availability is not has not been a priority issue for managing cougar. It’s very important, but we believe there are no foreseeable issues that will limit prey.

The Department concurs that this is tied to prey. However, the department believes that there is ample prey available for cougar populations, so prey availability is not has not been a priority issue for managing cougar. It’s very important, but we believe there are no foreseeable issues that will limit prey.

In this context sustained yield means a stable cougar population both numerically by count and population growth rate, and with adequate representation by all sex and age classes for territorial stability.

The Department attempted to manage for a population reduction (about 25%) through increased hunting. The result was a declining growth rate (lambda) but do to an influx in subadult males, the total population remained nearly the same. The end result was a population nearly void of adult cougars, instead comprised mostly of juvenile animals with a lower propensity for stable territories and successful reproduction.

The department does not manage cougars for the benefits to prey species (ungulates) unless cougar predation is believed (through scientific investigation) to be limiting an ungulate population from reaching the departments population objective (see predator-prey in Chapter 2).

Harvest to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations.

Thank you for your comment. The Department believes it is important to manage the cougar population at a spatial scale that best represents the on the ground cougar population.

Oh heck yes more studies more scientist less enforcement.

Thank you for your comment. The Department believes enforcement is a top priority. Research investigations are used answer specific questions and depend on funding and other resources.

(2 comments) Too many cougars

Thank you for your comment. The Department experimented in increased cougar harvest to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

Thank you for your comment. Another way of describing it is that if prey populations where to increase 10%, cougar populations would likely not increase 10%, because cougars, particularly adult males, have a land-tenure system, where they defend a territory and keep other males out (at least try) regardless of the fluctuations in prey. So, in this regard, adult male abundance is limited by suitable habitat, not prey.

Thank you for your comment. The Department concurs that this is tied to prey. However, the department believes that there is ample prey available for cougar populations, so prey availability is not has not been a priority issue for managing cougar. It’s very important, but we believe there are no foreseeable issues that will limit prey.

Thank you for your comment. In this context, health means long-term sustainable populations, naturally reproducing at levels to perpetuate the species, with genetic or other limitations that might impact the species in the long-term, with adequate social structure, behavior, and other ecological dynamics. Interactions of cougars with prey are covered on a case by case situation and discussed in Predator Prey in Chapter 2.

Minimizing cougar –livestock and cougar-pet conflicts is included under the umbrella human-cougar. We will consider clarifying this in the final version. Additionally, minimizing livestock depredation caused by carnivores is addressed under Objective 21 in the Game Management Plan.

Thank you for your comment. The Department must adhere to legislative mandates.

In this context sustained yield means a stable cougar population both numerically by count and population growth rate, and with adequate representation by all sex and age classes for territorial stability.

The Department attempted to manage for a population reduction (about 25%) through increased hunting. The result was a declining growth rate (lambda) but due to an influx in subadult males, the total population remained nearly the same. The end result was a population nearly void of adult cougars, instead comprised mostly of juvenile animals with a lower propensity for stable territories and successful reproduction.

The department does not manage cougars for the benefits to prey species (ungulates) unless cougar predation is believed (through scientific investigation) to be limiting an ungulate population from reaching the departments population objective (see predator-prey in Chapter 2).

Densities include all cougar habitat in Washington, including moderate sized riparian areas in agricultural areas and suburban landscapes. The resolution for estimate cougar habitat was between 30 and 90 meters.
of information on many species of ungulates in the GMP to have any idea on how to rectify prey estimate the acceptable number of cougar to also meet prey species objectives and hunting. Why are we spending such vast resources on a species that is as resilient as cougars are?

The harvest guidelines on page 109-l l 0 states that the number is actually closer to 1,900. The significant male dominance and social organizations of prey species (deer/elk/bighorn sheep etc). The only tool that has been applied has been a reduction of seasons and harvest which has allowed for dramatic population growth.

"Cougar population size is limited by the available habitat" We understand this statement as over population has caused cougars to occupy the last available ha bitat such as under people's houses in their barns and on t heir back porches. Throughout this document we see no reference to ecology, social structure, male dominance and social organizations of prey species (deer/elk/bighorn sheep etc). Why are we spending such vast resources on a species that as resilient as cougars are?

General Comments: Studies have estimated the number of adult territorial cougars in Washington to develop the stated number of 1,800. However it is important to note that the table 1 on page 109-l 1 states that the number is actually closer to 1,900. The significant issue that exists is that this number doesn't account for the number of sub-adults and adult males with non-territorial behavior on the landscape (unknown number of the total 3600) that create extra predatory pressure on ungulates. The harvest guidelines do not account for this, discussed more below. The WDFW assumes that cougar populations must remain at current levels and all guidelines regarding harvest follow this assumption. A population that is 25% lower than the current level is likely viable, and as indicated on page 106 would result in lower cougar-human conflicts. Similarly, a 25% lower overall population may very well provide for improved ungulate populations and higher recreational harvest.

III. DATA COLLECTION

It's hope prey availability really does enter into the equation of predicting potential cougar numbers and a simple density estimate is replaced in favor of actual potential number of cougar the prey can support considering hunter harvest and other needs (RCW 77.04.012 "The commission shall attempt to maximize the public recreational ... hunting opportunities of all citizens..."). We challenge the WDFW to model prey numbers and cougar kill rates to estimate the acceptable number of cougar to also meet prey species objectives and hunting. The "Population Objectives" issue statement states that "...recent analysis comparing number of complaints and previous year's harvest levels suggests that harvest at levels below 24% of the estimated population had no effect on reducing the overall number of cougar-human conflicts". The following Objective 88 states "Manage for a stable cougar population in each PMU (see exceptions)". The Plan should identify here how objective 88 deals with the conflict issue statement, and why the state would not increase harvest to above 24% of the population to reduce conflict issues where they occur. Were pleased to see prey availability finally enter into the equation of predicting potential cougar numbers (Strategy a). Hopefully, this means that the current estimate is replaced with an estimate of the number of cougar the prey can support considering hunter harvest (RCW 77.04.012). We note that this objective is scheduled to be completed by 2015. We feel this highly unlikely to occur as there is a stated lack of information on many species of ungulates in the GMP to have any idea on how to rectify prey and cougar numbers.

In terms of hunting method (tool), the use of dogs to hunt cougars was banned by voter initiative. In a review of cougar management, the state legislature has not allowed continued use of cougar hunting with dogs during recreational seasons. Current cougar seasons are among the longest seasons for any game animal and start Sept 1 through Dec 31, and in many areas through March 31.

The department does not manage cougars for the benefits to prey species (ungulates) unless cougar predation is believed (through scientific investigation) to be limiting an ungulate population from reaching the departments population objective (see predator-prey in Chapter 2)

The impacts of a greater than 25% removal of cougars to cougar populations, ungulate populations, and human-cougar conflict is unknown. Based on the scientific evidence we do have, we suspect removal rates greater than 25% would result in a declining growth rate, a population with little to no adult cougars. It's unknown if this would trigger more or fewer conflicts or depredations on ungulates, although some research suggests it could result in increased conflict and increased predation on some ungulate species.

The Department estimates population growth research data on survival, population size, recruitment, dispersal, etc. The result data has been published and is in the literature cited section of the chapter.

Through the predator-prey section in chapter 2, the department is proposing considering to manage cougar to benefit prey only when cougar predation has been demonstrated (scientifically) to limiting the prey population from reaching the departments objective. The Department is proposing managing cougar to maximize the recreational opportunities of an hunted ungulate population.
Strategies:

b. Compare cougar PMUs to information on genetic population structure (page 106). Why is the WDFW concerned with genetic structure of the cougar when you do not have any prey base numbers for deer, moose and some elk herds? If the department is going to manage cougars according to their mandates they need to get their priorities straight!!

c. Identify PMUs with emerging management priorities (e.g., cougar-livestock conflict, cougar-ungulate interactions) (page 106).

The use of incidence reports only captures a percentage of the actual cougar conflicts because people do not report all incidences. This lack of reporting of incidences is based on the perception that people have of the WDFW being too slow to respond and not providing an effective resolution. This means that people are killing problem cougars and not reporting it to the WDFW.

Cougar/pt conflict should also be a management priority. Most of the pets killed by cougars just disappear and the carcasses are not found and thereby not reported, this is a very large and increasing problem in rural areas.

In the event of an emerging management priority the WDFW needs to immediately open hound hunting so that the correct cougars are being taken out of an area. Only by treeing can we start hound hunting so that the correct cougars are being taken out of an area. 

Public Comment:

A stable population does not have to mean a mixed out population. The cougar population should hold at a low enough level for higher ungulate population then present. This benefits hunters and in turn sells licenses which was mentioned as an objective earlier in the survey.

WDFW Response:

Thank you for your comment. The Department experimented in increased cougar harvest to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

Public Comment:

Here again, guessing is the default used in determining populations and it simply is unacceptable.

WDFW Response:

Thank you for your comment. The Department experimented in increased cougar harvest to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

Public Comment:

Hounds!!

WDFW Response:

The use of dogs to hunt cougar was banned by voter initiative.

PUBLIC COMMENT

Increase cougar populations and create more opportunities for ecotourism.

WDFW RESPONSE

The use of dogs to hunt cougar was banned by voter initiative.

Public Comment:

Kill more cougars.

WDFW Response:

The Department experimented in increased cougar harvest to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

Public Comment:

Let them manage themselves. Humans cannot manage Cougars without creating conflicts. The kits need their mom for 3 years.

WDFW Response:

Thank you for your comment. The Department is mandated by state stature to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

Public Comment:

Likewise, cougars populations need to be preserved. They are apex predators and self-managing. Hunting of these animals needs to be ended. Co-existence education would be extremely valuable.

WDFW Response:

Thank you for your comment. The Department is mandated by state stature to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

Public Comment:

Manage would be great - allow hound hunting. It is the only way to be successful.

NO

WDFW Response:

The use of dogs to hunt cougar was banned by voter initiative.

Public Comment:

No, they eat too many deer.

WDFW Response:

The use of dogs to hunt cougar was banned by voter initiative.

While cougars do eat deer and other ungulates, the Department is not aware of any areas with cougar predation is limiting an ungulate population from reaching population objectives. If we do detect that situation, the Department may consider cougar removals (see predator-prey guidelines in Chapter 2).
Stable cougar population is great but numbers need to be reduced statewide. Deer populations are down in many units in large part due to the high number of cougars.  

Thank you for your comment. The Department experimented in increased cougar harvest to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

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The agency does not have information on population so this objective is not realistic

Thank you for your comment. The Department recently completed 13 years of cougar research among 6 different study areas and now has robust information on cougar population size.

The best and most effective way to manage the cougar population, Is with the use of hounds.

The use of dogs to hunt cougar was banned by voter initiative.

Have plenty of your number are up

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The studies have done a good job at estimating the number of adult territorial cougars in Washington to develop the stated number of 1,100. However we note that Table 1 on page 109-110 states that the number is actually closer to 1,900. The significant issue that exists is that this number doesn’t account for the number of sub-adults and adult males with non-territorial behavior on the landscape (unknown number of the total 3600) that create extra predatory pressure on ungulates. The harvest guidelines do not account for this (see comments under Objective 90). The WDFW assumes that cougar populations must remain at currently predicted level and all guidelines regarding harvest follow this assumption. The current population, which is based on “behavioral-based organization” indicates a maximum potential population limited by the available habitat. Thus, we are managing to maintain the maximum population of cougars on the landscape. We do not see any discussion on whether the population could be managed at a lower but viable level in balance with ungulate population objectives. There has not been a public process that provides management alternatives and solicits input on what the public or Tribes would be willing to accept as a baseline population level for cougars. A population that is 25% lower than the current level is likely viable, and as indicated on page 106 would result in lower cougar-human conflicts. Similarly, a 25% lower overall population may very well provide for improved ungulate populations and higher recreational harvest.

P-19 According to the Dept’s posted cougar populations over the years, cougar populations have fallen from about 3,000 in 1996 to about 1,800 today.

This is mostly semantics and how cougar population estimates are described in older plans. The earlier number was from population reconstruction which is not as accurate as our current estimate. In addition the previous estimate included kittens, which the current estimate is only territorial adults.

In the discussion on prey impacts on cougar the statement “The current population levels for deer and elk populations are compatible with the cougar population objectives for each PMU.” If it would seem this may be true, but considering that Objective 87 has not been completed at this point it is not a fact. Particularly, as for many ungulates mentioned in this plan, there is no current estimate of population size.

The estimated population size and harvest should include subsalids because these may be harvested at a higher rate than adults by boot hunters and public safety removals. If the harvest guideline is based on adults, then it is erroneous to apply subsalids killed to the harvest quota.

The Estimated Population column has some ridiculous numbers, for example, in GMU’s 466, 485, and 490 it says “62” but the harvest guide is only 2-3. These need to be corrected.

This strategy does not follow from Objective 87 where you state that you will evaluate PMU’s based on prey availability. How can your objective be to manage for a stable population without having evidence that the prey base can support the stable population? And if the prey base is negatively affected, and cougar numbers decline because of lack of food, cougar hunting will likely be the first to be closed to the public when in fact it should be increased to help restore the prey base. It seems that you need to work on objective 87 first and get those numbers worked out before setting an objective for a “stable” population. Are cougar monitoring methods sensitive enough to detect changes in cougar numbers? If so, what is the minimum change that can be detected? When is the baseline population estimate determined to set a target population number? If cougar numbers increase or decrease, will that become the new stable population target or will harvest be adjusted to bring numbers in line with the baseline, assuming prey are adequate.

This issue is addressed in the Predator-prey section in Chapter 2. If cougar predation is limiting an ungulate population from reaching objective, cougar removals may increase.

The table has been updates to include all population information on harvestable cougars (excludes small kittens).

Strategy a: Implement a harvest guideline that corresponds to a stable cougar population at the PMU level

Do you know if the prey can support the assumed stable population? If prey populations decline and cougar numbers correspondingly fall, will WDFW’s first effort be to close hunting for cougars instead of liberalizing cougar hunting to help recover the prey population? It would seem that the work proposed under Objective 87 should be completed before setting any objective for a “stable population”.

This statement doesn’t make any sense, if your harvest guideline allows for the “maximum sustainable harvest” and this level of harvest occurs you can’t have a stable growth rate. Are we managing for cougars at a stable population or as a growing population?

This issue is addressed in the Predator-prey section of Chapter 2. At this point in time, the department believes the available ungulate population can support the cougar population without impacting the ungulate populations ability to reach population objectives.
Population Objectives
Wildlife managers are frequently asked to balance the desire for abundant wildlife populations and other equally important objectives. Given the variety of interests in cougars, cougars are managed in some areas of Washington to minimize cougar-human conflicts, while at the same time maintaining long-term sustainable populations. Previously, harvest levels were increased in areas with high human-cougar conflict in an effort to reduce these conflicts. However, recent analysis comparing number of complaints and previous year’s harvest levels suggests that harvest at levels below 24% of the estimated population had no effect on reducing the overall number of cougar-human conflicts (Peebles et al. 2013). This recent analysis would hold true given the current baseline and the recruitment level which appears to be 50% (1,800 sub-adult and kittens). The issue statement indicates that cougars will be managed at their current level which is a level that ensures the population continues to grow. We believe a real discussion is needed which balances a viable, persistent cougar population with ungulate populations that are providing maximum hunting opportunity within the limitations of available habitat. A cougar population at its maximum capacity will reach equilibrium with prey and maintain their prey at levels not necessarily compatible with providing robust recreational hunting opportunity. (see attachment Makah Fawn Report) The research was on a black-tailed deer population in western Washington and found that predation, most frequently by cougars, played a role in limiting deer population growth along with nutrition in forage and Hair-Loss Syndrome. While they found that some of the losses from predation were likely compensatory, deer populations would likely improve if the observed rate of predation was lower. Similarly, the Muckleshoot Tribe presented evidence at the 8th Western States and Provinces Deer and Elk Workshop in Spokane Washington in 2009 that cougar reductions assisted in the recovery of an elk herd in serious decline. Furthermore, the Muckleshoot Tribe presented a model that predicts a tolerable number of cougars that can exist while promoting herd growth and improved human harvest of elk. We believe that maintaining cougar populations at a lower level statewide would likely improve young adult ratios which are chronically low in many of our ungulate populations.

Strategies:
a. Implement a harvest guideline that corresponds to a stable cougar population at the PMU level.

"Management of predators to conserve the wildlife in a manner that does not impair the resource while maximizing the public recreation-providing hunting opportunities for all citizens".
b. Implement a harvest guideline for a maximum sustainable harvest while at the same time providing an overall stable growth rate plus an age structure with adequate adult males for social stability (page 110).

In strategy (a) We are managing for a "stable" population, according to Webster "stable" means enduring, lasting, permanent, and perpetual.

In strategy (b) we are managing for a stable growth rate not "population" while at the same time managing for a maximum sustainable harvest, this is not possible. If you are managing for a maximum sustainable harvest you are effectively taking the surplus each year and stabilizing the population as a set level as in strategy a.

The current management strategy is for an increasing cougar population, with a 50% annual recruitment rate (1,800 animals under 2 years old) and less that 10% hunter harvest plus 2% harvest of problem animals based on an adult territorial population of approximately 1,800 animals.

c. Modify harvest strategies and objectives consistent with management objectives and new scientific information (page 107) on predator I prey relationships.
d. Implement education and outreach on living with carnivores (page 107).

We do not believe that carnivores should be living in rural/residential areas or areas where livestock is wintered and in areas that have not had carnivores for the past 60 years until we do not want to live with carnivores.

CONCERNS: To address concerns regarding cougar Public Safety Cougar Removal (PSCR). These hunts do not ‘target’ the individual problem animal but are intended to reduce population numbers within areas of management concern. PSCR hunts are an attempt to address "periodic management removals to address emerging areas of chronic cougar conflict with people, livestock and pets". This is in contrast to the stated strategy to "Conduct targeted cougar removals in GMUs with human-cougar interactions." and is counter to scientific findings that "number of complaints and previous year’s harvest levels suggests that harvest at levels below 24% of the estimated population had no effect on reducing the overall number of cougar-human conflicts (Peebles et al. 2013). Issuing permits after a target number for management is achieved results in kill permits issued months after a ‘problem’ has occurred and unlikely to target and remove the individual responsible for the depredation or threat.

Thank you for your comment. The Department is managing cougar populations with two population demographics in mind: maintain a growth rate of 1.0 (stability) and maintain adequate representation of all sex and age classes in order to maintain the territoriality on the landscape.

While preliminary findings in presentations are useful, the Department’s cougar management objectives and strategies are based on published findings in peer-reviewed literature.

Thank you for your comment. In this context, health means long-term sustainable populations, naturally reproducing at levels to perpetuate the species, with genetic or other limitations that might impact the species in the long-term, with adequate social structure, behavior, and other ecological dynamics.
The WDFW needs to adhere to its legislative mandate. By maintaining adult male social capacity will reach an equilibrium with prey and maintain their prey at levels not necessarily
Similarly, the Muckleshoot Tribe presented evidence at the States and Provinces Deer and Elk Workshop in Spokane Washington in 2009 that cougar reductions assisted in the recovery of an elk herd in serious decline. Furthermore, the Muckleshoot Tribe presented a model that predicts a tolerable number of cougars that can exist while promoting herd growth and improved human harvest of elk. We believe that while some of the losses from predation were likely compensatory, predation was also additive to a degree and deer populations would likely improve if the observed rate of predation was lower. Similarly, the Muckleshoot Tribe presented evidence at the States and Provinces Deer and Elk Workshop in Spokane Washington in 2009 that cougar reductions assisted in the recovery of an elk herd in serious decline. Furthermore, the Muckleshoot Tribe presented a model that predicts a tolerable number of cougars that can exist while promoting herd growth and improved human harvest of elk. We believe that while some of the losses from predation were likely compensatory, predation was also additive to a degree and deer populations would likely improve if the observed rate of predation was lower.

We agree with this objective. Thank you for your comment. The Department is managing cougar populations with two population demographics in mind: maintain a growth rate of 1.0 (stability) and maintain adequate representation of all sex and age classes in order to maintain the territoriality on the landscape. While preliminary findings in presentations are useful, the Department’s cougar management objectives and strategies are based on published findings in peer-reviewed literature.

We question the value of this approach as we have not seen this approach applied to any other species the WDFW manages. Thank you for your comment. The Department seeks to maximize recreation opportunities (including hunting) while at the same time maintain a stable cougar population with adequate representation of all sex and age classes to maintain social dynamics. Modeling is actively used for many species in Washington.

We do not believe that carnivores should be living in rural/residential areas or areas where livestock is wintered and in areas that have not had carnivores for the past 60 years until recently. Thank you for your comment. The Department manages cougars for long-term sustainability, while at the same time maximizing recreational opportunities, and minimizing conflict with people.

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The Department seeks to maximize recreation opportunities (including hunting) while at the same time maintain a stable cougar population with adequate representation of all sex and age classes to maintain social dynamics.
It is not working. Change strategy and manage.  

We do not believe that carnivores should be living in rural/residential areas or areas where livestock is wintered and in areas that have not had carnivores for the past 60 years until recently.

NO (2 responses)

We need to increase the harvest of cougars in the state. The population is extremely high since we are unable to hunt with dogs and continues to decimate our deer and elk populations. We should bring back hunting for bears and cats back and allow hunters to control the predator populations. By doing this you will increase license sales and in turn increase revenue, hunter retention, and recruitment.

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Reduce lethal actions whenever possible. Experiment with nonlethal deterrents and exhaust them before lethal action is taken.

Science suggests that hunting is counterproductive to stable populations.

Take action when they get to abundant in a region

This plan should include a public debate and comment period before implementation.

Use hounds

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Objectives 90

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Objective 90 indicates that recreational harvest can be allowed at 12-16% of the cougar population excluding kittens in each PMU. It appears that the harvest guideline is in reality not maximizing cougar harvest as the 12-16% appears to just represent the ~1,800 adult territorial cougars. If 6,000 cougars is the total cougar estimate including adult, sub-adult, and kittens, then a portion of the additional 1,800 cougars not represented must be sub-adult and should justify a higher overall quota in each PMU. Cougar harvest mandates a carcass check by WDFW staff within 72 hours, including the removal of a tooth for aging. Sub-adults are easily identified by limited gum recession and white dentition. Harvest of these animals should not count towards the harvest guideline or the guideline should be adjusted higher.

The micromanagement of harvest within individual PMUs appears to be unnecessary, particularly as very few PMUs meet let alone exceed the harvest guideline, particularly in western Washington. As currently structured, using boot hunters primarily, cougar populations won't decline and are unlikely to even be stabilized (maximum sustainable harvest) at current levels. This is particularly evident when table 1 indicates the average

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harvest is 32-104 cougars below the threshold of allowable harvest. Harvest guidelines should be based more on regional total harvest allowed rather than closing one or 2 PMUs while the remainder of PMUs fall consistently under their quota annually. Particularly as sub-adults have tremendous dispersal capabilities to fill voids in areas where harvest is higher.

We note that the harvest guidelines do not discuss the split season in the 2013 and 2014 hunting regulations and why it was implemented. Additionally, it would seem that as cougars breed year-round, there is no increase in vulnerability for reproducing females that justify a closed season at all when harvest guidelines are not being met. We recommend that the season remains open year-round in PMUs where the harvest quota has not been met to maximize the opportunity for recreational harvest and to increase the probability that the harvest guideline is met annually.

Overall Comment: The bottom line is the current cougar strategy is poorly explained in the document. It contains serious errors in the table depicting population size in each PMU. The harvest appears to be based entirely on adult territorial animals which doesn't reflect the total population of independent dispersing cougars. Seeks to establish the maximum number of cougars on the landscape regardless of the capacity of their prey to support the desired population size for the next 6 years.

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Objective 90: Provide recreational harvest opportunity at a 12-16% annual harvest rate of the cougar population, excluding kittens in each PMU (see exceptions).

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We note that the harvest guidelines do not discuss the split season in the 2013 and 2014 hunting regulations and why it was implemented. Additionally, it would seem that as cougars breed year-round, there is no increase in vulnerability for reproducing females that justify a closed season at all when harvest guidelines are not being met. We recommend that the season remains open year-round in PMUs where the harvest quota has not been met to maximize the opportunity for recreational harvest and to increase the probability that the harvest guideline is met annually.

We do see breeding pulses in Washington and prefer not to hunt when there are pulses of young of the year on the ground.

Objective 90: Provide recreational harvest opportunity at a 12-16% annual harvest rate of the cougar population, excluding kittens in each PMU (see exceptions).

PUBLIC COMMENT

The Department experimented in increased cougar harvest (about 24%) to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

Harvest in the 40-50% range is likely not obtainable.
Whatever the best science suggests
Thank you for your comment. Based on published research, the maximum harvest that still results in stable populations and intact social structure is 14% (95% confidence interval of 12-16%).

Absolutely NOT
Thank you for your comment. Based on research, the maximum harvest that still results in stable populations and intact social structure is 14% (95% confidence interval of 12-16%).

(22 comments) Agree
Thank you for your comment. The Department is mandated by state statute to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

Allow hunting to the hunter and see if it's a lactating female or if she has kittens.
Thank you for your comment. Hunting for cougars is currently lawful.

Check Out Oregon's Cougar Management. Very liberal & low cost of Tags. A must if foudning is not legal.
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Cougar season should be year around since hounds are no longer allowed.
Thank you for your comment. Please direct season length comments to the 3-year season package process.

Do people really need to be killing cougar kittens? I'll never figure out for the life of me, why anyone would want to kill any animal, let alone a baby.
Thank you for your comment. Cougar kittens are not a target for hunters. It is illegal to harvest spotted kittens and females with spotted kittens.

Eliminate cougar hunting by 2021.
Thank you for your comment. The Department is mandated by state statute to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

For what are cougars being harvested? This is a ridiculous euphemism.
Thank you for your comment. The Department is mandated by state statute to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

Hunting, if allowed at all, should be below 12% level.
Thank you for your comment. The Department is mandated by state statute to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

I am opposed to recreational killing of cougar and other wildlife. Their lives are valuable and, particularly if there is no conflict, they have a right to live.
Thank you for your comment. The Department is mandated by state statute to maximize recreational opportunities (including hunting) for cougars while at the same time maintaining long-term sustainable populations.

In units where cougar harvest is low, extend the seasons to year round, depending on harvest, susceptible to closure if goals are met
Thank you for your comment. Please direct season length comments to the 3-year season package process.

It is a universal law that forbids to speak about harvesting cougar godless scam
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The use of dogs to hunt cougar was banned by voter initiative.
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kill all on site and hunt with dogs.
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Last year N.E. Wash had a harvest rate of 9% which filled the quota. If we doubled the quota it would not be enough and you would see a no decline in the cougar populations.
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PREGNANT FEMALES AND BABIES SHOULD BE EXEMPT FROM HUNTING
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raise to 20-25%
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See above--end the harvesting, i.e. killing. It is unnecessary. Studies show killing animals is strongly linked to killing other humans—it is simply the next step.
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That number should be higher based on the high population numbers.
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Thank you for your comment. The Department recently completed 13 years of cougar research among 6 different study areas and now has robust information on cougar population size.

The best and most effective way to manage the cougar population is with the use of hounds.
The Department experimented in increased cougar harvest (about 24%) to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

There are too many cougars, more need to be harvested.
The Department experimented in increased cougar harvest (about 24%) to reduce cougar-human and cougar-livestock conflict. Increased cougar harvest did not have a clear cause-and-effect relationship with reduced conflict. In addition, increased harvest did not result in reduced populations; it resulted in a similar abundance but with fewer adult cougars and more juvenile cougars. The Department now manages for stable cougar populations and recent research indicates populations are stable.

This seems quite high for cougars, given the relatively low reproductive rate of cougars.
Thank you for your comment. Based on published research, the maximum harvest that still results in stable populations and intact social structure is 14% (95% confidence interval of 12-16%).

This should also exclude breeding females (pregnant or with kittens). This plan should include a public debate and comment period before implementation.
Thank you for your comment. It is illegal to harvest spotted kittens and females with spotted kittens. The public input process for the GMP includes written comment, public meeting, and an open public forum by the Commission prior to adoption.

we are getting better here
Thank you for your comment.

Whatever the best science suggests
Thank you for your comment. Based on published research, the maximum harvest that still results in stable populations and intact social structure is 14% (95% confidence interval of 12-16%).
Washington leads the nation in cougar research, and the distributed hunt to reduce social disruption and attendant human conflict is a considerable step. However, the Dept has been slow to close PMUs that have entered the 12%-16% bracket, and in multiple cases have significantly exceeded the upper end.

The WDFW provides recreational harvesting opportunity on the known cougar populations to allow for an annual harvest 12-16% which yields an annual harvest of 175 cougars per year which is less than 10% of the mature population. In reviewing the WDFW incident reports from June 2013-May 2014 the WDFW killed 41 problem cougars, relocated 7, and issued 25 depredation permits with unknowntn dispatched. The WDFW is clearly single species managing for cougars to the detriment of prey species, hunters and rural residents. During this time period the WDFW employees confirmed 157 dead livestock and 16 dead pets all killed by cougars.

Cougars are managed for long-term sustainability, while at the same time maximizing recreational opportunities, and minimizing conflict with people. We agree with this statement however, the WDFW is not currently doing this.

To achieve this, cougar are managed geographically in PMUs with full seasons, where specific PMU's close to hunting once 12-16% harvest levels are reached, which is the maximum sustainable harvest to achieve the population objective.

While we appreciate the WDFW's attempt to address conflicts in Western WA by not placing harvest quotas in Western WA residential areas (see GMUs 133, 136, 139, 142, 248, 454, 260, 262, 266, 269, 272, 278, 284, 290, 330, 334, 371, 372, 373, 379 & 381) we would like to see the same approach applied to Eastern WA rural areas.

Overall comment:
The micromanagement of harvest within individual PMUs appears to be un-necessary; particularly as very few PMUs meet or exceed the harvest guideline. As currently structured, using hunt permits primarily, cougar populations won't decline and are unlikely to even be stabilized at current levels. This is particularly evident when table 1 indicates the average harvest is 31-104 cougars below the threshold of allowable harvest. Harvest guidelines should be based more on regional total harvest allowed rather than closing one or 2 PMUs while the remainder of PMUs fall consistently under their quota annually. Additionally, it would seem that as cougars breed year-round, there is no increase in vulnerability for reproducing females that justify a closed season at all when harvest guidelines are not being met. We recommend that the season remains open year-round in PMUs where the harvest quota has not been met to maximize the opportunity for recreational harvest and to increase the probability that the harvest guideline is met in a given year. Also see comments on objective 90 and strategy A below.

Objective 90 indicates that recreational harvest can be allowed at 12-16% of the cougar population, excluding kittens in each PMU. It appears that the harvest guideline is in reality not maximizing cougar harvest as the 12-16% appears to just represent the -1,800 adult territorial cougars. It's 600 cougars is the total cougar estimate including adult, sub-adult, and kittens, then a portion of the additional 1,800 cougars not represented must be sub-adult and should justify a higher overall quota in each PMU. Cougar harvest mandates a carcase check by WDFW staff within 72 hours, including the removal of a tooth for aging. Sub-adults are easily identified by limited gum recession and white dentition. Harvest of these animals should not count towards the harvest guideline or the guideline should be adjusted higher.

The 12-16% harvest rate is applied to all sex and age cougars except kittens.

The cougar section of this plan still uses the 12-16% strategy and it is the strategy as a whole that ensures well distributed harvest of cougar. Exceeding the harvest bracket in a few units should not result in any measurable problems for cougar populations.

The data in the public column was erroneous and has been corrected.

We note that the harvest guidelines do not discuss the split season in the 2013 and 2014 hunting regulations and why it was implemented. Additionally, it would seem that as cougars breed year-round, there is no increase in vulnerability for reproducing females that justify a closed season at all when harvest guidelines are not being met. We recommend that the season remains open year-round in PMUs where the harvest quota has not been met to maximize the opportunity for recreational harvest and to increase the probability that the harvest guideline is met annually.

Cougars managed for long-term sustainability while at the same time maximizing recreational opportunities, and minimizing conflict with people. We agree with this statement however, the WDFW is not currently doing this.

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The 12-16% harvest rate is applied to all sex and age cougars except kittens.

The data in the public column was erroneous and has been corrected.

The 12-16% harvest rate is applied to all sex and age cougars except kittens. The population size column in the table is updated.

We note that the harvest guidelines do not discuss the split season in the 2013 and 2014 hunting regulations and why it was implemented. Additionally, it would seem that as cougars breed year-round, there is no increase in vulnerability for reproducing females that justify a closed season at all when harvest guidelines are not being met. We recommend that the season remains open year-round in PMUs where the harvest quota has not been met to maximize the opportunity for recreational harvest and to increase the probability that the harvest guideline is met annually.
The bottom line is the current cougar strategy is poorly explained in the document. It contains serious errors in the table depicting population size in each PMU. The harvest appears to be based entirely on adult territorial animals which doesn’t reflect the total population of independent dispersing cougars. Stroes to establish the maximum number of cougars on the landscape regardless of the capacity of their prey to support the desired cougar population. Finally, the strategy employed has a single species approach that doesn’t consider the ramifications to prey populations and declining participation by hunters which the Commission has highlighted as very important. The Commission should not allow the GMP to be used as a forum to codify the cougar management strategy for the next 6 years.

Are the cougar population monitoring techniques at a PMU level sensitive enough to detect population changes, and if so, how much of a change is necessary to detect it?

---causing a measurable population decline...

Are the cougar population monitoring techniques at a PMU level sensitive enough to detect population changes, and if so, how much of a change is necessary to detect it?

Table 1.
The estimated population size and harvest should include subadults because these may be harvested at a higher rate than adults by boot hunters and public safety removals. If the harvest guideline is based on adults, then it is erroneous to apply subadults killed to the harvest quota.
The Estimated Population column has some ridiculous numbers, for example, in GMU’s 466, 485, and 490 it says “62” but the harvest guide is only 2-3. These need to be corrected.

**Objective 91:** Account for all human related cougar mortalities every year.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
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</thead>
<tbody>
<tr>
<td>(25 comments) Agree</td>
<td></td>
</tr>
<tr>
<td>Already being done.</td>
<td></td>
</tr>
<tr>
<td>This is currently implemented. The department is recommending continuing this objective.</td>
<td></td>
</tr>
</tbody>
</table>

**Objective 92:** Minimize negative human-cougar interactions so that the “number of interactions per capita” is constant or declining from 2007 levels.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
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</tr>
</thead>
<tbody>
<tr>
<td>A positive human-cougar interaction would be a harvest...</td>
<td></td>
</tr>
<tr>
<td>Thank you for your comment.</td>
<td></td>
</tr>
</tbody>
</table>

| (16 comments) Agree |
| Allow use of hounds to hunt cougars. |
| The use of dogs to hunt cougar was banned by voter initiative. |

| No |
| Thank you for your comment. |
| Small without dogs |
| Thank you for your comment. |

| Some times difficult when kills are not reported. |
| Thank you for your comment. |
| It is unlawful to not report a cougar harvest. |

| (2 comments) why? |
| Why does it take so long to include cougar in the game harvest statistics? Cougar pelts are required to be sealed within 5 days, so there should be a log documenting all harvest. State removals should also be easily tallied and included in the harvest report. Compared to other species, cougar harvest should be the easiest to keep track of, yet it takes forever for it to show up in the harvest report. We recommend improving cougar harvest reporting so it is available with the rest of the game harvest reports. |
| Thank you for your comment. |

| Prosecute poachers with real laws and consequences. |
| Thank you for your comment. |
| Cougar harvest information helps the Department understand population growth and impacts of hunting on populations. |

| Why? |
| Thank you for your comment. |
| The data in the public column was erroneous and has been corrected. |

| Is this really a problem? I think the departments time could be better spent elsewhere. |
| Thank you for your comment. |
| This is currently implemented. The department is recommending continuing this objective. |

| Make the numbers and occurrences known to the public through the news media every time it happens. People need to know to be on the look out when in the woods or in the animals area AND they need to see the consequences of their voting with their heart and not their head when it comes to bating and hounds. |
| Thank you for your comment. |

| NO |
| Thank you for your comment. |
| The Department believes estimating cougar harvest is a priority. |

| Community tolerance and work to educate Washingtonians about cougar habita. |
| Thank you for your comment. |
| The Department believes education and outreach can influence future conflict levels. |

| Encourage tolerance and work to educate Washingtonians about cougar habitat. Objective 90 proposes hunting cougar and here we are talking about minimizing cougar conflict. It would be good if we could leave them alone and not fragment their habitat. |
| Thank you for your comment. |
| The Department believes education and outreach can influence future conflict levels. |

| Hard to do |
| Thank you for your comment |
| If more does that mean if conflict escalates the Department would re-evaluate our current practices to see if changes and improvements are needed. |

| Is this really a problem? I think the departments time could be better spent elsewhere. |
| Statewide, conflicts are relatively low compared to a decade ago. The Departments objective is to keep conflicts low, and address the emerging issues as they occur. |

| Maybe you can figure out how to modify human behavior and expectations. |
| Thank you for your comment. |
| The Department does use outreach and education to inform, which may alter human actions and expectations. |

| NO |
| Thank you for your comment. |
| Personal safety and protection of property is a priority for the department as it pertains to wildlife. |

| Not a priority |
| Thank you for your comment. |
| Personal safety and protection of property is a priority for the department as it pertains to wildlife. |

| Sounds good, but will never happen. The Department is only in control of some variables, but not the most important one... humans. |
| Thank you for your comment. |
| The Department does use outreach and education to inform, which may alter human actions and expectations. |

| Teach humans not to hunt in Cougar habitat. Teach humans not to hate cougars. They are harmless. |
| Thank you for your comment. |
| The Department does use outreach and education to inform, which may alter human actions and expectations. |

| This should include a provision to prevent or make illegal people owning cougars as pets. |
| Thank you for your comments. |
| Statewide, conflicts are relatively low compared to a decade ago. The Departments objective is to keep conflicts low, and address the emerging issues as they occur. |

| Yes, budget allowing. |
| Thank you for your comment. |
| Yes, possibly allow huting in certain area to reduce cougar numbers and conflicts |
| Thank you for your comment. |

| You live in their area interactions will happen. Live with it. |
| Thank you for your comment. |
| The Department does use outreach and education to inform, which may alter human actions and expectations. |
Where beaver are moved to should consider cougar numbers and the potential for failed relocation due to predation.

Objective 93: Develop a report that describes the demographic and behavioral differences between cougar populations in suburban versus rural environments by 2020.

PUBLIC COMMENT

WDFW RESPONSE

Issue: Statement: To properly manage cougar populations for sustainability, prevent harvest in excess of guidelines, and minimize cougar-human conflict, it's imperative to know how many animals are lethally removed each year, the kill location, and biological data related to the animal (e.g., age, sex, weight).

Only a percentage of the actual cougar conflicts are being reported because people do not report all incidences. This lack of reporting of incidences is based on the perception that people have of the WDFW being too slow to respond and not providing an effective resolution. What this means is that people are killing problem cougars and not reporting it to the WDFW. Most of the pets killed by cougars just disappear and the carcasses are not found and thereby not reported.

Thank you for your comment. Our research in 6 study areas of 13 years does not suggest poaching at the level you suggested.

Strategies:

a. Develop publications documenting the results of completed research.

b. Utilize research findings to modify policy and management as appropriate.

c. Update educational materials to incorporate research findings.

d. Investigate the role of corridor design for facilitating or discouraging cougar movements.

e. Determine the relationship between the level of human-cougar conflict in a stable versus unsustainable cougar population.

f. Evaluate the proportion of specific sex and age class of cougar to be involved in human-cougar conflict.

Thank you for your comment. Adult cougars are only part of the harvest strategy. The harvest level is applied to all age classes (excepted spotted kittens), the adult component is only the behavior side, to ensure the territoriality is maintained and the population is not swamped by sub-adults.

Why are we funding all of this research on cougars as they have already proven their resilience? This appears to be the future direction of WDFW predator management which is now being applied to wolf research.

General statement: These problems are best solved by reducing cougar populations. The WDFW needs to address the causation of these problems (cougars that are displaced from cougar habitat) not respond to the effects. This is best achieved through better engagement of the hunting and sporting communities to effectively manage cougar populations at a level that the ungulate prey base and hunter harvest can sustain. The bottom line is the current cougar strategy and harvest appears to be based entirely on adult territorial animals which doesn't reflect the total population of independent dispersing cougars.

Seeks to establish the maximum number of cougars on the landscape regardless of the capacity of their prey to support the desired cougar population. Finally, the strategy employed has a single species approach that doesn't consider the ramifications to prey population and declining participation by hunters which the Commission has highlighted as very important.

Monitor the implementation and effectiveness of its policies and goals (page 1 2013-2015 Strategic Plan).

The Commission needs to ensure that the WDFW adhere to its mandates as it develops this GMP and future GMPs.

We appreciate having the opportunity to comment on this document as it will play a pivotal role in the future of Washington's management of wildlife and habitat. We hope that the Commission finds our comments constructive and valuable. We would like a section (P.108) in regards to predation being additive or compensatory.

Muckleshoot data needs to be included. The Department is currently completing research on this topic. The information will be published.

Thank you for your comment.

Again, I think the departments time could be better spent elsewere.

Thank you for your comment.

Another lawyer scientist written question. Heck yes more studies.

Thank you for your comment.

Don't waste your money

More information is preferred to less.

Should already have this info.

Develop better plans for relocating cougars other than dart gunning them from suburban trees and just killing them.

The department does not lethally removal all cougars. If the cougar is just in the wrong spot and the wrong time and no deprivations have occurred and there are no unusual behavior, the cougar may be relocated.

A good objective here would be to address the uncertainty earlier stated in the "Impacts" section (P.108) in regards to predation being additive or compensatory. Mucklehoof data suggests substantial additive predation mortality on deer and elk in western habitats. Further examination of additive compared to compensatory mortality by WDFW in other habitats may help show that predator management can be a useful tool in certain scenarios.

In several places in the cougar chapter the text says "see exceptions" but there are no explicit exceptions mentioned. These REALLY need to be included for a better understanding of WDFW's management intention. Please include a section heading "Exceptions" and list all of these.

It appears that those that want predators on the landscape in WA do not want the predators in their suburban backyard, entertaining such a study further confirms this thinking. Rural and suburban environments are not cougar habitat.

Thank you for your comment.

(259 comments)
### Research Issue Statement (page 111)

Cougars and people live in close proximity to each other in several areas of the state, which can result in conflict. Understanding cougar dynamics in these environments is critical, as the potential for conflict will likely increase as human populations continue to increase and expand into rural environments (Spencer et al. 2001).

We do not agree with this issue statement. We believe the reverse is true in regards to the populations of cougars. Populations of cougars are expanding and taking up residence in rural environments. People have lived on the same properties for over a century with no cougar problems until the last few years. This can be resolved by reducing cougar populations. Further research is not warranted as it just leads to more protection of an overly populated and resilient species.

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<thead>
<tr>
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<tr>
<td>(24 comments) Support objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(2 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Provide outreach and opportunities for non-hunters to obtain bird stamps for conservation and acquisition of habitat.</td>
<td>Thank you for your suggestion. We will work to implement this idea.</td>
</tr>
<tr>
<td>ONLY if this land is available to hunt.</td>
<td>This is a priority for WDFW and occurs on all projects.</td>
</tr>
<tr>
<td>And then don’t let hunters shoot them there.</td>
<td>Some parts of WDFW wildlife areas are not hunted.</td>
</tr>
</tbody>
</table>

### Objective 95: Manage waterfowl populations consistent with population objectives outlined in Table 1, developed considering NAWMP, Pacific Flyway Council, and Joint Venture plans.

<table>
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<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(3 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Increase population objectives.</td>
<td>We encourage additional efforts to refine these objectives based on new studies.</td>
</tr>
<tr>
<td>Without a link to the supporting documents it’s hard to comment. In general increase populations levels, reduce bag limits.</td>
<td>Documents are available at <a href="http://www.pacificflyway.org">www.pacificflyway.org</a>. Objectives have been set to provide recreational opportunity consistent with the status of these populations.</td>
</tr>
<tr>
<td>The National Audubon Pacific Flyway will be generating more information along with Joint Venture. I hope this will fill the many information gaps about populations and related aspects (habitat, food).</td>
<td>We encourage additional efforts to refine these objectives based on new studies.</td>
</tr>
</tbody>
</table>

### Objective 96: Document distribution, movements, and survival in accordance with flyway management goals by achieving annual banding objectives.

<table>
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<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(4 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(2 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Without a link to the supporting documents it’s hard to comment. In general increase populations levels, reduce bag limits.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>The answer depends on the species, and is independent of USFWS harvest surveys.</td>
<td>We encourage additional efforts to refine these objectives based on new studies.</td>
</tr>
<tr>
<td>Desirable, if reporting is standardized. Reporting is standardized.</td>
<td>This is currently being accomplished.</td>
</tr>
<tr>
<td>The agency response is so slow this is not a realistic objective.</td>
<td>WDFW response to mortality events is typically rapid to avoid significant die-offs and secondary effects.</td>
</tr>
<tr>
<td>(4 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Rather see 95% CI.</td>
<td>90% reduces sampling costs while still providing accurate harvest estimates.</td>
</tr>
<tr>
<td>Yes. Use a poacher patrol, too.</td>
<td>WDFW has been successful in improving compliance with existing laws.</td>
</tr>
<tr>
<td>Already done</td>
<td>This objective is a continuation of the approach used in the last two editions of the Game Management Plan.</td>
</tr>
</tbody>
</table>

### Objective 98: Obtain accurate and precise estimates of waterfowl harvest, number of hunters, and effort, accurate to ±10% at the 90% CI.

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<tr>
<td>Already done</td>
<td>This objective is a continuation of the approach used in the last two editions of the Game Management Plan.</td>
</tr>
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### Objective 99: Continue current policies to maximize duck hunting recreation consistent with USFWS Adaptive Harvest Management (AHM) regulation packages, considering duck availability during fall and winter.

<table>
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<tbody>
<tr>
<td>(24 comments) Support objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(2 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Yes and increase seasonal hunting days until February</td>
<td>Duck season dates are as late as possible under federal frameworks.</td>
</tr>
<tr>
<td>Work with the National Wildlife Refuge System to provide better waterfowl hunting access.</td>
<td>This is a priority for WDFW.</td>
</tr>
<tr>
<td>Yes, increase season hunting days until February.</td>
<td>This is a priority for WDFW.</td>
</tr>
<tr>
<td>Duck and goose numbers are declining from pressures in Canada, summer habitat and poachers.</td>
<td>Current information does not support this statement, because many species are near or above expected levels.</td>
</tr>
<tr>
<td>Disagree need to change hunting days</td>
<td>More detail needed for response.</td>
</tr>
</tbody>
</table>

### Objective 100: Maximize goose-hunting recreation consistent with Pacific Flyway Council plans, considering goose availability during fall and winter.

<table>
<thead>
<tr>
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<tr>
<td>(24 comments) Support objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>(4 comments) Oppose objective / strategies</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>More focus needs to be placed on harvest of non-migratory geese, including coordination with private land owners and other public agencies.</td>
<td>WDFW advocates increased hunting opportunity as a means to reduce goose damage wherever possible.</td>
</tr>
</tbody>
</table>
Agree, except with resident Canada goose, which should be removed from PFC planning and managed by WDFW as a separate sub-population. Unlike creative strategies to control excess populations of urban geese in problem areas, such as "hunting" with dip nets during the flightless season, hunting with net capture guns over decoys or out of a scull boat, hunting with bola, boomerangs, blunt-throwing darts, or anything else relatively safe and silent. None of these things can be done with resident geese under present federal management structures, which is why they need to be removed from federal management.

Let us get rid of those nasty pooping canadas that ruin our local parks and green spaces. Canada geese are protected by federal laws and treaties. WDFW supports innovative ways to control nuisance geese in areas closed to hunting.

Objective 101: Maintain hunter numbers between 35,000-45,000 and recreational use days between 300,000-500,000, consistent with population objectives.

PUBLIC COMMENT
(21 comments) Support objective / strategies
Thank you for your comment.

(5 comments) Oppose objective / strategies
Thank you for your comment.

Increase youth waterfowl hunting
WDFW has been working to increase youth hunting opportunities.

Better to find sources of revenue from the non-consumptive users whose numbers greatly exceed hunters. This has been a priority for many conservation agencies.

I would waterfowl hunt if license requirements weren't such a hassle. To kill a duck I need a small game license, state migratory bird permit, and federal migratory bird stamp...Make it one license. Not going to even mention the requirements for hunting geese in 2A and 2B. Licenses requirements are determined by the Washington legislature and federal government.

More for public not the rich
WDFW has been working to increase public hunting opportunities.

I think hunter numbers should be decreased as I find their violent hobby horrifying.

Objective 102: Generate at least five information and education products each year to improve transfer of information to public.

PUBLIC COMMENT
(24 comments) Support objective / strategies
Thank you for your comment.

(4 comments) Oppose objective / strategies
Thank you for your comment.

I have seen some of this work and found it to only partially work because when human habitat has decreased it is not considered a gain in wildlife habitat. The maps need to reflect both gains and losses of wildlife habitat.

Thank you for your comment.

Why Spend more money?
This objective is a continuation of the approach used in the last two editions of the Game Management Plan.

including how the state will protect private property owners from damage done by wildlife
Please see Living with Wildlife series on our web site.

Objective 103: Quantify habitat loss by developing habitat maps and management guidelines. These maps and guidelines should be posted on the agency web site by 2016.

PUBLIC COMMENT
(33 comments) Support objective / strategies
Thank you for your comment.

(1 comments) Oppose objective / strategies
Thank you for your comment.

I have seen some of this work and found it to only partially work because when human habitat has decreased it is not considered a gain in wildlife habitat. The maps need to reflect both gains and losses of wildlife habitat.

Thank you for your comment.

Objective 104: Provide funding through state migratory bird stamp/print revenues to conserve/expand 50 acres of habitat annually for doves, pigeons, costs, and snipe.

PUBLIC COMMENT
(22 comments) Support objective / strategies
Thank you for your comment.

(1 comments) Oppose objective / strategies
Thank you for your comment.

Min. 200,000 acres. Not just 50.
Project development is limited by revenue.

Yes. 100 acres.
Project development is limited by revenue.

Good start. I would like for this to be an annual goal rather than a six-year goal.
Project development is limited by revenue.

Support, but 500 acres min, we need more doves!
Project development is limited by revenue.

I am a pratical and radically low number of acres. 1000 acres per year means something.
Project development is limited by revenue.

acquire land as well
Acquisition is part of the conservation strategy for these species.

this land should be from state lands first ...enhancement
In some cases, acquisition must occur to prevent loss of critical habitat and provide recreation.

this is one of those areas you could probably get some cooperation from private land owners on
WDFW has been working to develop migratory bird habitat on private lands open to hunting.

Use a multi-species approach!! Snipe and coot can come from the waterfowl efforts and doves may come from some upland efforts. For sandhill, focus on mineral springs.
Most waterfowl-oriented projects benefit cost and snipe.

Fees are just going up for the hunters, why do we not collect from everyone who view wildlife and object to hunting. The state seems fine to try and put a dollar fee on our license tabs for bus commuters so the people who do choose to ride and not pay for car licenses or gun or insurance will not have to have their daily fares go up.
This issue is in the purview of the State legislature, which establishes fees for hunting and transportation.

Prefer that there be no hunting of mourning doves and band-tailed pigeons
These species are managed to provide recreation consistent with the status of the populations.

Address cat predation by removing feral populations in or near conservation areas.
Agreed this would be an effective tool.

Objective 105: Conduct annual surveys and participate in studies to monitor whether Pacific Flyway Council population objectives are being met for mourning doves and band-tailed pigeons.

PUBLIC COMMENT
(23 comments) Support objective / strategies
Thank you for your comment.

(2 comments) Oppose objective / strategies
Thank you for your comment.

Dove habitat information is nonexistent.
We have good information on mineral site locations but poor information on location of nesting and foraging areas.

Objective 106: Obtain accurate and precise estimates of statewide harvest, number of hunters, and effort, accurate to ±10% at the 90% CI.

PUBLIC COMMENT
(19 comments) Support objective / strategies
Thank you for your comment.

(5 comments) Oppose objective / strategies
Thank you for your comment.

Hunters are required to submit a harvest/hunting report by January 31st. You can also have more check stations to collect harvest data.
Check stations for these species would not be a high priority due to cost / effectiveness.

Be cautious when utilizing hunter reporting tools as management tools! Not all hunters are ethical or honest in their reporting. Those for fishermen too.
Hunter reports are an important part of our management strategies, and we rely on hunters to submit accurate reports.

Agree, and maintain unlimited harvest of eurasian collared doves
WDFW intends to retain this opportunity.

These species should not be classified as game. Eliminate hunting these species by 2021.
Thank you for your comment.

Should already be done
This objective is a continuation of the approach used in the last two editions of the Game Management Plan.

Objective 107: Monitor conflicts each year and implement effective conflict management strategies to help resolve issues as they arise. Report activities in the annual Status and Trend report.

PUBLIC COMMENT
Create a more effective way to match hunters with land owners who are experiencing conflicts! If there is a way to do this, create a more effective way to inform hunters of these possible opportunities.
A strategy in the public access chapter is intended to address this need.

Conflicts should be dealt with by hunter activities
Wherever possible general season hunting is the preferred method to address conflict situations.

Quit looking at flocks that are in conflict as nuisance and comeder that they are either
We recognize that both of these issues contribute to conflicts and we try to address them.
overpopulation for local area or may be drawn to feed sources left by humans. Coordinate
relocation efforts with NWTF chapters for a ready volunteer base and matchup with Objective 109
below.

Agree that hunting opportunity should be the preferred method of addressing wild turkey damage
issues. Excessive use of landowner take permits should be discouraged as the default response to
wild turkey damage.

Objective 109: By 2017, develop a list of release sites within established turkey range that may benefit turkey populations

We do consider hunter comments and input.

I agree with this objective.

I agree with this objective.

I agree with this objective.

I agree with this objective. Relocation is used but as a last resort due to cost.

Suggest developing a protocol for identifying the proposed list of release sites. For example, list
would include areas with stable to declining populations, same subspecies as the trap site, will
also report progress or lack of progress on long term problems like private property damage.

Realty -- turkey conflicts??? just tell me where the conflicts are

PUBLIC COMMENT

\textbf{Objective 108: Where fall seasons are in place, and other areas where an emphasis is needed, expand monitoring of turkey populations utilizing the protocol developed in NE Washington population management unit (PMU) or other appropriate methods, to track changes in populations over time.} \textbf{WDWF RESPONSE}

The releases referenced in the objective are limited to those situations where relocation becomes necessary to address wildfowl conflicts. This is not intended to expand the range where turkeys currently occur.

Relocation to address damage would still be viewed as a last resort due to the expense. Other strategies in the plan would attempt to increase the opportunities for general season hunters to help address landowner concerns to minimize the need for issuing landowner kill permits.

Would support additional research on food habitat or other topics that may improve our management ability. The NE Washington protocol was adjusted but we do not try to compare the results prior and after the change was made.

Objective 109: By 2017, develop a list of release sites within established turkey range that may benefit turkey populations and minimize human conflicts. Release turkeys at these locations when relocation is necessary to abate damage or other conflict.

\textbf{WDWF RESPONSE}

I have lived here since 1948. In the early 1970 the state brought in Turkey and before this time there
was none. The state continues to find habitat reasons to continue there expansion. Why? There are
everywhere now causing damage to crops home vegetation and cause many auto accidents.

Thank you for your perspective but improvement is needed in this area.

I agree with this objective.

Public seasons for wild turkeys. Who are you trying to kid? This is the kind of information that would be included in reports referenced in the objective.

Agree that protocols to objectively monitor wild turkey trends should be a high priority in wild
turkey management. Winter surveys are cost effective because turkeys are concentrated and easier
to find; but poult:hen ratios provide important productivity information. In areas where production
limitations are of concern, particularly SW Washington, summer poult surveys should be
considered. Adaptive management utilizing trend information should be first applied to full season
adjustments. Citizen-based monitoring is an interesting idea worth considering.

\textbf{WDWF RESPONSE}

Have to fix your monitoring protocols from the

\textbf{WDWF RESPONSE}

We do consider hunter comments and input.

I agree with this objective.

I agree with this objective.

I agree with this objective.

\textbf{WDWF RESPONSE}

I have lived here since 1948. In the early 1970 the state brought in Turkey and before this time there
was none. The state continues to find habitat reasons to continue there expansion. Why? There are
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Thank you for your perspective but improvement is needed in this area.

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I agree with this objective.

I agree with this objective.

\textbf{WDWF RESPONSE}

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was none. The state continues to find habitat reasons to continue there expansion. Why? There are
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Thank you for your perspective but improvement is needed in this area.

I agree with this objective.

I agree with this objective.

I agree with this objective.

\textbf{WDWF RESPONSE}

I have lived here since 1948. In the early 1970 the state brought in Turkey and before this time there
was none. The state continues to find habitat reasons to continue there expansion. Why? There are
everywhere now causing damage to crops home vegetation and cause many auto accidents.

Thank you for your perspective but improvement is needed in this area.

I agree with this objective.

I agree with this objective.

I agree with this objective.
Objective 10: Monitor turkey population trends in each Wild Turkey Population Management Unit (PMU) annually. Identify limiting factors and modify management strategies as needed to address population, harvest, or recreational objectives to increase populations.

PUBLIC COMMENT
In favor of updating the WTMP with specific recommendation for each PMU, including population and harvest objectives, as well as release sites. It seems like the logical place to collect this information.

WDFW RESPONSE
The Wild Turkey Management Plan was considered a supplement to one of the earlier Game Management Plans and at the time was considered a temporary need. We will evaluate whether a new plan is needed that would address topics beyond those now included in the Game Management Plan.

You have a portion of turkey tag designated to bird management, yet have failed to spend those dollars in most cases. Use these dollars, earmarked at the request of turkey hunters by the legislature to actually benefit the species, and not just pay some one to sit behind a desk doing paper biology.

WDFW RESPONSE
Our use of these funds for habitat work expanded within the last two years and we intend to continue this. Very little administrative cost is charged to this fund source and when it is it must be directly tied to turkey or upland bird management.

Objective 11: Monitor spring turkey harvest where fall seasons occur to determine if fall harvest is affecting spring hunter success, and evaluate potential changes to allowed hunting methods.

PUBLIC COMMENT
Do not change hunting methods from shotgun or archery. Trukey hunting. Spring and Fall, is in an up close-in-your face type of hunt for most. As a hunter, the last thing I want to worry about is some moron shooting a rifle across a field at the same group of birds I may be calling, while in camo and in the line of fire.

WDFW RESPONSE

Get rid of the fall Teanaway season. The population cannot support additional harvest. This unit has the burden of being the closest turkey population to the Seattle Metro area. The birds are hunted extremely hard all spring. That is enough

WDFW RESPONSE

Agree - important to keep a close watch on fall seasons as removing adult females from population can strongly affect population trends over time. Increasing hunting opportunity should be accomplished through improved hunter access rather than increasing harvest rates through non-traditional hunting methods such as the use of rifles.

WDFW RESPONSE

Agree - important to keep a close watch on fall seasons as removing adult females from population can strongly affect population trends over time. Increasing hunting opportunity should be accomplished through improved hunter access rather than increasing harvest rates through non-traditional hunting methods such as the use of rifles.

Objective 12: Over the next five years, increase the number of acres of private land available in priority turkey range.

PUBLIC COMMENT
Allowing hunting on private land must remain optional for both home owners and corporations.

WDFW RESPONSE

Objective 13: Conduct 10 habitat improvement projects in key wild turkey management areas to accomplish multiple goals including addressing conflict issues, improving public recreation opportunities, and improving habitat conditions for multiple species by 2021.

PUBLIC COMMENT
Regarding strategy e), aspen regeneration is not particularly important to wild turkeys. While important habitat, for this document, suggest changing "aspen regeneration" to "sugarbark enhancement", and/or cottonwood stand regeneration.

WDFW RESPONSE

Instead, you should be setting aside resources to definitively assess turkey impacts on native forest grouse. This is NOT 1960, IT'S 2014. Get WITH IT!

WDFW RESPONSE

Agree, also test methods of harvest outlined above for use in urban areas where shotguns would be unsafe.

WDFW RESPONSE

Agree, also test methods of harvest outlined above for use in urban areas where shotguns would be unsafe.

WDFW RESPONSE

Agree, also test methods of harvest outlined above for use in urban areas where shotguns would be unsafe.

WDFW RESPONSE

Objective 14: Provide additional money to improve habitat and enhance access.

WDFW RESPONSE

OBJECTIVE 14: Provide additional money to improve habitat and enhance access.

WDFW RESPONSE
The department could actually try being responsive to and meet with the NWTF State Chapter once a year instead of being to tally absent and not responding to requests for attendance at annual NWTF state board meetings. If invited, we would be willing to attend these meetings.

yes plant turkeys in the Chinook Wildlife hunting Area near Chinook Washington Turkeys are present in this vicinity and habitat enhancements may benefit the population.

No new releases are planned at the present time.

<table>
<thead>
<tr>
<th>Objective 114: Support at least one research project that increases knowledge of wild turkeys in western habitats.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>NO — do 3 if needed and none if they are not needed — these gadgets are really stupid We receive a high number of concerns regarding the potential effects of turkeys, which are not native, on other species or habitats. Expanded knowledge in this area would be beneficial when making management decisions.</td>
</tr>
<tr>
<td>(14 comments) Yes or agree Thank you for your support.</td>
</tr>
<tr>
<td>go easy Thank you for your comment.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>information already exists We receive a high number of concerns regarding the potential effects of turkeys, which are not native, on other species or habitats. Expanded knowledge in this area would be beneficial when making management decisions.</td>
</tr>
<tr>
<td>(2 comments) NO Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>NO No No Way too many studies Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>Low the price of tags. This is under consideration but is not related to this objective.</td>
</tr>
<tr>
<td>(2 comments) NO Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>Support Thank you for your support.</td>
</tr>
<tr>
<td>Lower the price of tags. This is under consideration but is not related to this objective.</td>
</tr>
<tr>
<td>(2 comments) NO Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>Yes definitely do that! Thank you for your support.</td>
</tr>
<tr>
<td>Yes, please focus on this species Thank you for your support.</td>
</tr>
<tr>
<td>You mean city Quail. The are doing well, don't get me wrong there a great bird around the place. If it wasn't for homeowners compatibility they would be long gone in the hills. Mountain quail are a different species than California quail that are commonly found around towns and cities.</td>
</tr>
<tr>
<td>(3 comments) OK Thank you for your support.</td>
</tr>
<tr>
<td>Social media Thank you for your comment.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective 115: Utilize existing information to help determine distribution of suitable mountain quail habitat and the need for enhancement within the bird’s native range in Washington by 2016.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>Yes. Too many have been killed with pesticide and habitat loss on private land. Decrease hunting. Thank you for your support. Hunting for this species is currently limited to western Washington where it was introduced outside of its native range and the bag limit is conservative.</td>
</tr>
<tr>
<td>(18 comments) Yes or agree Thank you for your support.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>NO Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>(2 comments) OK Thank you for your support.</td>
</tr>
<tr>
<td>Identify key private land areas as well. Enhancement on private land will be considered. Mountain quail are a different species than California quail that are commonly found around towns and cities.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>No city quail and home owners quail. Mountain quail are a different species than California quail that are commonly found around towns and cities.</td>
</tr>
<tr>
<td>(2 comments) OK Thank you for your support.</td>
</tr>
<tr>
<td>Support Thank you for your support.</td>
</tr>
<tr>
<td>will see if it happens. Field surveys will be part of the assessment. Thank you for your support.</td>
</tr>
<tr>
<td>Good idea Thank you for your support.</td>
</tr>
<tr>
<td>Yes definitely do this! Thank you for your support.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective 117: Evaluate results from re-introduction efforts in Asotin County by 2016 and the need to modify release strategies. Consider additional reestablishment projects in historic range in eastern Washington if suitable habitat is determined to be present.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>Mountain Quail should not be a game species. Eliminate hunting by 2021 Within the native range hunting seasons are closed. Hunting does occur in areas where they have been introduced outside of their native range.</td>
</tr>
<tr>
<td>(19 comments) Yes or agree Thank you for your support.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>No indefinitely do this and incorporate serigators to increase reestablishments in suitable habitats. Modifications to release procedures will be considered.</td>
</tr>
<tr>
<td>(19 comments) Yes or agree Thank you for your support.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>I am unsure if reintroduction is a good idea. why are they gone? We are confident that habitat change is one key factor. Strategies under Objectives 115 and 116 are intended to address this.</td>
</tr>
<tr>
<td>(2 comments) NO Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>Will see if it happens. Field surveys will be part of the assessment. Thank you for your support.</td>
</tr>
<tr>
<td>OK Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>Support Thank you for your support.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Objective 118: Using existing harvest data, build a dataset to evaluate harvest changes at the county level by 2016 and evaluate factors that may have contributed to changes in harvest by 2021. Consider including broader scale wing collections to evaluate individual species status and age structure in the evaluation.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>The band-tailed pigeon has been managed out of existence over the years by the US Fish and Wildlife and the Washington State Fish and Game has been doing the same thing with forest grouse. In my youth the grouse season started and ended in the month of September and there was no forest grouse hunting during elk season. Your management program allows forest grouse hunting from September through the end of the year. This is NOT management for the specie and as I see it for grouse hunting during elk season. Your management program allows forest grouse hunting from September through the end of the year. This is NOT management for the specie and as I see it for grouse populations. Part of the work referenced may reexamine this assumption and could lead to proposals to reduce hunting pressure.</td>
</tr>
<tr>
<td>(2 comments) OK Thank you for your support.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
<tr>
<td>As one of the least reported harvests, I suspect, time to proceed. Thank you for your perspective and support of the objective.</td>
</tr>
<tr>
<td>Disagree additional studies not needed Thank you for your perspective.</td>
</tr>
<tr>
<td>Good Thank you for your support.</td>
</tr>
<tr>
<td>Habitat is the main issue for forest grouse We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>I agree with this objective. Thank you for your support.</td>
</tr>
</tbody>
</table>

264
**Objective 119:** Investigate potential causes of declining participation by 2017 and if not related primarily to confirmed declines in grouse populations, take appropriate measures to increase interest and opportunity. Recommend changes to harvest strategies if needed to address population declines.

**PUBLIC COMMENT**

<table>
<thead>
<tr>
<th>Your perspective</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grouse populations are on a dramatic decline and we must find out why. I believe they are an indicator species to the overall health of our ecosystems and the wildlife within them. The grouse, Blacktail deer, and Roosevelt elk are all on a dramatic decline and the bears, cougars, and coyotes are at all an all time high. That should tell us that our ecosystem is out of balance and something must be done to fix the problems.</td>
<td>Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>I would like to see something done. When you call the department for info on grouse all they say is there are no annual surveys being done. No info available in various areas, just drive the forest roads in the morning Duh!</td>
<td>Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>Seek modification of forest practices to improve forage for grouse (most producing plants) and big game.</td>
<td>This is the type of action that could occur as a result of work proposed under Objective 118.</td>
</tr>
<tr>
<td>The bandtailed pheasant has been managed out of existence over the years by the US Fish and Wildlife and the Washington State Fish and Game has been doing the same thing with forest grouse. In my youth the grouse season started and ended in the month of September and there was no forest grouse hunting during elk season. Your management program allows forest grouse hunting from September through the end of the year. This is NOT management for the specie and as I see it for money sales and dollars. You cannot manage for money and still have healthy populations.</td>
<td>Past work has tended to support the theory that hunting is generally does not limit forest grouse populations. Part of the work referenced may reexamine this assumption and could lead to proposals to reduce hunting pressure.</td>
</tr>
<tr>
<td>In this case, hunters probably know best among stakeholders. Not a species birders pay much attention to.</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>Logging Logging Logging. any other ideas needed.</td>
<td>We agree that human influences on habitat may affect grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>Habitat is teh main issue to grouse decline</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>I agree with this objective.</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>The outcome of investigations discussed under Objective 18 would be made available to the public and other agencies.</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
</tbody>
</table>

**WDFW RESPONSE**

<table>
<thead>
<tr>
<th>Your perspective</th>
<th>WDFW RESPONSE</th>
</tr>
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<tbody>
<tr>
<td>Thank you for your comment.</td>
<td></td>
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<tr>
<td>Thank you for your comment.</td>
<td></td>
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<tr>
<td>Thank you for your comment.</td>
<td></td>
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<tr>
<td>Thank you for your comment.</td>
<td></td>
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<tr>
<td>Thank you for your comment.</td>
<td></td>
</tr>
<tr>
<td>Thank you for your comment.</td>
<td></td>
</tr>
<tr>
<td>This kind of work is described under objective 118 and in the Wild Turkey chapter of the plan.</td>
<td></td>
</tr>
<tr>
<td>Acknowledged. Thank you for your comment.</td>
<td></td>
</tr>
<tr>
<td>Acknowledged. Thank you for your comment.</td>
<td></td>
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<tr>
<td>Acknowledged. Thank you for your comment.</td>
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<tr>
<td>Acknowledged. Thank you for your comment.</td>
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<tr>
<td>Thank you for your comment.</td>
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<tr>
<td>Acknowledged. Thank you for your comment.</td>
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</table>

**Objective 120:** Conduct a survey by 2017 to evaluate hunter opinions related to allowed forest grouse harvest methods and seasons from a social perspective and their effect on populations. Based on the results, and grouse population management needs, consider making recommendations to modify regulations.

**PUBLIC COMMENT**

<table>
<thead>
<tr>
<th>Your perspective</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>BIRD POPULATIONS IN GENERAL HAVE STEADILY DECLINED OVER THE LAST 5 YEARS. WE NO LONGER WASTE MONEY ON BIRD LICENSE ENDORSEMENTS.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Closed roads more predators</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Fertilizer and herbicide use by timber companies should be looked into as a cause in grouse population decline.</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>GROUSE POPULATIONS ARE FINE TAKE A SURVEY TO SEE HOW MANY YOU SEEN AND COULD NOT GET A SHOT AT.</td>
<td>Field surveys may be included in the work outlined under Objective 118.</td>
</tr>
<tr>
<td>Habitat is teh main issue to grouse decline</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>I agree with this objective.</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Logging Logging Logging. any other ideas needed.</td>
<td>Thank you for your perspective. We agree that human influences on habitat may affect grouse populations.</td>
</tr>
<tr>
<td>Need look at</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Not enough birds</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>Should do.</td>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Shot down the season altogether for a couple years. An total closure would not be likely to have a long term benefit if habitat quality is limiting populations.</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>Stop timber companies from poisoning them ?? We want to hunt them.</td>
<td>We agree that habitat changes due to a number of factors may be affecting grouse populations. The studies proposed may help support changes to current practices.</td>
</tr>
<tr>
<td>Reduce the limit</td>
<td>This may be considered during development of three year hunting season proposals.</td>
</tr>
<tr>
<td>Why? Is your job to promote hunting, or just serve those who may or may not want to hunt?</td>
<td>Thank you for your perspective. The work proposed under Objective 118 may help identify factors that limit grouse populations.</td>
</tr>
<tr>
<td>A strategy under Objective 119 addresses this point.</td>
<td></td>
</tr>
<tr>
<td>Keep harvest methods the same.</td>
<td>Thank you for your comment.</td>
</tr>
<tr>
<td>In this case, hunters probably know best among stakeholders. Not a species birders pay much attention to.</td>
<td></td>
</tr>
<tr>
<td>Social perspective ????? It costs a lot of money to go hunting....less people target grouse because it cost too much to hunt them.</td>
<td></td>
</tr>
<tr>
<td>sure -- but too many people shooting at them all the time</td>
<td>Thank you for your perspective. Poaching does influence populations of most game species to varying degrees.</td>
</tr>
</tbody>
</table>

**WDFW RESPONSE**

<table>
<thead>
<tr>
<th>Your perspective</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thank you for your support.</td>
<td></td>
</tr>
<tr>
<td>Acknowledged. Thank you for your comment.</td>
<td></td>
</tr>
<tr>
<td>Acknowledged. Thank you for your comment.</td>
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<td></td>
</tr>
<tr>
<td>A strategy under Objective 119 addresses this point.</td>
<td></td>
</tr>
</tbody>
</table>

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265
In my youth the grouse season started and ended in the month of September and there was no forest birds to increase along with a reduction in predators. But if you are going to continue to plant pheasants then you need to plant hens also. Do not allow the harvest of hens but common sense tells me that if all you plant are roosters where will all the eggs come from for the next year. We should be trying to build the populations buck up not just provide a harvestable product. By planting the hens along with the roosters then you are accomplishing something. And if you are planting 50 roosters then plant at least 25 hens with them.

You should not just focus on the focus area, there are habitat improvements and agreements that can be put together across eastern Wa. Enhancement efforts do occur in other areas but we have emphasized work in the focus area. If successful, and as funding becomes available we will consider work in additional areas.

Objective 121: Continue to focus enhancement efforts in the pheasant focus area. Work with and habitat especially for nesting and brood rearing. Maintain existing agreements that foster quality. WDFW RESPONSE

If you are going to continue to plant pheasants then you need to plant hens also. Do not allow the harvest of hens but common sense tells me that if all you plant are roosters where will all the eggs come from for the next year. We should be trying to build the populations buck up not just provide a harvestable product. By planting the hens along with the roosters then you are accomplishing something. And if you are planting 50 roosters then plant at least 25 hens with them.

The focus area was chosen due to the cost effectiveness of enhancements in this rainfall zone, the likelihood of success and anticipated willingness of landowners to support the program.

Enhancement efforts do occur in other areas but we have emphasized work in the focus area. If successful, and as funding becomes available we will consider work in additional areas.

266
<table>
<thead>
<tr>
<th>Objective 125: By 2021, investigate whether chukar population declines or other factors are the primary cause of chukar harvest and chukar hunter participation.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>Make public hunting areas for chukars more apparent, better communication on these areas.</td>
</tr>
<tr>
<td>We are making improvements to the private lands information to help hunters identify where species are available to hunt and we hope to expand this concept to public lands as well.</td>
</tr>
<tr>
<td>Acknowledged. Thank you for your comment.</td>
</tr>
<tr>
<td>Yes definitely!</td>
</tr>
<tr>
<td>You definitely find out why their populations are declining!</td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>BIRD POPULATIONS IN GENERAL HAVE STEADILY DECLINED OVER THE 5 YEARS. WE NO LONGER WASTE MONEY ON BIRD LICENSE ENDORSEMENTS.</td>
</tr>
<tr>
<td>There are some indications that chukar populations may be increasing at least some local areas but this does need further investigation. Reintroduction might be considered if they are found to be absent from suitable habitat.</td>
</tr>
<tr>
<td>Coyote control would probably not have lasting benefits to chukar populations. Habitat improvements that make birds less susceptible to predation are generally a more successful approach.</td>
</tr>
<tr>
<td>Thank you for your support.</td>
</tr>
<tr>
<td>Objective 126: Evaluate potential changes to the current season structure that may expand interest and participation in upland bird hunting by 2017. Make recommendations to the Fish and Wildlife Commission if changes are found to be beneficial.</td>
</tr>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>A general season extending into January is far too long. The birds can barely survive the cold temperatures and snow at the end of such a long season without the added hunting pressure. Shortening the season to end at least by the middle of December would greatly increase natural population carryover. Reinstate the split season to give the birds a break. If the length of the season is too short to provide adequate opportunity, start it sooner. The birds just don't stand a chance in the cold and snow of late December forward.</td>
</tr>
<tr>
<td>These are the types of ideas that would be considered and options to the current season structure including this suggestion will be considered through the three year season setting process.</td>
</tr>
<tr>
<td>Adjustments like these will be considered but some hunters would favor an earlier ending date.</td>
</tr>
<tr>
<td>Once again stop the silly week early Pheasant Season closure.</td>
</tr>
<tr>
<td>This option will be considered along with other potential options.</td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>There is already a lot of interest -- do you really need to expand it??</td>
</tr>
<tr>
<td>Upland bird hunter numbers have been declining steadily and we would like to reverse that trend if possible.</td>
</tr>
<tr>
<td>These are the types of areas that would be considered and options to the current season may be recommended during the three year season setting process.</td>
</tr>
<tr>
<td>Thank you for your recommendation.</td>
</tr>
<tr>
<td>Objective 127: Regarding the species-specific management plan for sage grouse.</td>
</tr>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
</tr>
<tr>
<td>This objective addresses the sage grouse focus area in southeast Washington. The number of birds released in western Washington has remained relatively constant over the past several years and we are searching for new release sites.</td>
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<td>Thank you for your perspective.</td>
</tr>
<tr>
<td>Support at least many</td>
</tr>
<tr>
<td><strong>WDFW RESPONSE</strong></td>
</tr>
<tr>
<td>Imagine release sites have been neglected.</td>
</tr>
<tr>
<td>Where we can, we do make improvements on release sites to improve hunting conditions.</td>
</tr>
<tr>
<td>Yes and open state park lands for pheasant release sites</td>
</tr>
<tr>
<td>Allowing hunting in state parks would require a change by the legislature that may not be widely supported among the general public.</td>
</tr>
<tr>
<td>Year definitely!</td>
</tr>
<tr>
<td>Change the season structure including this suggestion will be considered through the three year season setting process.</td>
</tr>
<tr>
<td>slee and snow of late December forward.</td>
</tr>
<tr>
<td>Yes definitely!</td>
</tr>
<tr>
<td>Nut to bird hunters.</td>
</tr>
<tr>
<td>Support, at least many</td>
</tr>
<tr>
<td>Yes definitely find out why their populations are declining!</td>
</tr>
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<td><strong>WDFW RESPONSE</strong></td>
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<tr>
<td>Objective 128:  By 2021, evaluate whether chukar population declines or other factors are the primary cause of chukar harvest and chukar hunter participation.</td>
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<td>Objective 130: By 2021, evaluate whether chukar population declines or other factors are the primary cause of chukar harvest and chukar hunter participation.</td>
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<tr>
<td>Thank you for your support.</td>
</tr>
</tbody>
</table>
### Objective 127: Estimate and monitor upland game bird harvest through a random survey on a yearly basis and assess other ongoing surveys as indicators of population trends by 2018. Consider changes to harvest monitoring strategies that may improve precision and reduce costs.

#### PUBLIC COMMENT

**BE CAUTIOUS WHEN UTILIZING HUNTER REPORTING TOOLS AS MANAGEMENT TOOLS! NOT ALL HUNTERS ARE ETHICAL OR HONEST IN THEIR REPORTING, THAT GOES FOR FISHERMEN TOO.**

- **WDFW RESPONSE**
  We acknowledge that some intentional misreporting occurs.

random survey tells you nothing because most hunter do not want you to know because you will print it and more hunters will go to the area

- **WDFW RESPONSE**
  We acknowledge that some intentional misreporting occurs. Because the reporting for small game is on a broader (county) scale hunters may be less likely to have this concern.

Absolutely, we need this data

- **WDFW RESPONSE**
  Thank you for your support.

(15 comments) Yes and agree

- **WDFW RESPONSE**
  Thank you for your support.

Already being done

- **WDFW RESPONSE**
  Thank you for your support.

Catch record reporting, no more studies.

- **WDFW RESPONSE**
  Thank you for your comment.

GOOD

- **WDFW RESPONSE**
  Thank you for your support.

I agree with this objective.

- **WDFW RESPONSE**
  Thank you for your support.

NO

- **WDFW RESPONSE**
  Acknowledged. Thank you for your comment.

(3 comments) OK

- **WDFW RESPONSE**
  Thank you for your support.

Okay

- **WDFW RESPONSE**
  Thank you for your support.

Random sounds nice – but systematic is often better. Sure, your strategy sounds fine

- **WDFW RESPONSE**
  Thank you for your perspective.

Support

- **WDFW RESPONSE**
  Thank you for your support.

Yes definitely!

- **WDFW RESPONSE**
  Thank you for your support.

### Objective 128: As new information and non-toxic alternatives become available, make nontoxic shot use recommendations to the Fish and Wildlife Commission through the season setting processes.

#### PUBLIC COMMENT

There is not enough scientific or biological data to prove that game birds or raptors are dying from lead poisoning instead of natural causes to require non-toxic shot for hunting game birds.

- **WDFW RESPONSE**
  Impacts of lead ammunition are documented and are a growing concern with the general public. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

Objective 128 states "As new information and nontoxic alternatives become available, make nontoxic shot use recommendations to the Fish and Wildlife Commission through the season setting process." This is a proposal to limit the use of lead ammunition through voluntary measures. Lead is a toxic metal that threatens the health of wildlife and humans by indiscriminately poisoning soil, waterways, and millions of animals. There are already good alternatives to lead ammunition and a plethora of good science demonstrating the need to take action.

The cost of ammo is already too high. To ban lead ammo would further increase the cost of ammo.

- **WDFW RESPONSE**
  The cost of some alternatives has become more competitive and some newer alternatives are safe for use in some older guns.

What would we do without traditional muzzleloader? What about old doubles of mod 12%, etc, that we still use. Our favorite includes with. There is very little or no evidence showing need to expand beyond where we are now. Consider all of the hunters with lead ammo or components now. To ban lead for big game hunting would be going to solids, which are armor piercing. Don't follow California in this, as there is too much to ban hunting as we no it altogether.

A few hunting rounds of lead aren't going to hurt anything. The impact is minimal, hunting areas are not trap ranges. Allow the use of lead. Nontoxic shot is not economically priced for most hunters and cannot be shot safely in older shotguns that are very popular with upland hunters.

- **WDFW RESPONSE**
  The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

Absolutely make lead shot illegal for upland birds as soon as possible, there are more than enough non-toxic alternatives available, even those that are safe for older guns. This does not need to be studied further, just eliminate lead shot.

- **WDFW RESPONSE**
  The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

Absolutely. Lead shot use needs to be banned statewide for all hunting, not just on WDFW owned or pheasant release areas.

- **WDFW RESPONSE**
  The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

Among the very high priorities among birders! this objective will likely attract many birders to this survey, and many will probably not respond to much else. To include for all upland bird hunting. Not part of the question explicitly, but would like to see an end to lead ammunition for all hunting, and bans for target shooting. But, one step at a time! More than hunted birds pay the price of lead ammunition.

Be realistic and make these recommendations only for areas that are problematic.

- **WDFW RESPONSE**
  The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

One of the reasons people stop hunting is the cost of ammo. If the nontoxic options are expensive you'll have hunters choose to spend the money elsewhere and stop hunting.

- **WDFW RESPONSE**
  The cost of some alternatives has become more competitive and some newer alternatives are safe for use in some older guns.

CONSIDER SAFETY OF NON TOXIC SHOT (STEEL) USED IN AND AROUND THE ROCKY HABITAT AREAS OF EASTERN WASHINGTON.

- **WDFW RESPONSE**
  Safety is always a key consideration in making decisions.

Disagree

- **WDFW RESPONSE**
  Acknowledged. Thank you for your response.

HOT TOPIC

- **WDFW RESPONSE**
  Thank you for your comment.

I agree with this objective.

- **WDFW RESPONSE**
  Thank you for your support.

Just eliminate lead shot from the state of Washington. There is no reason to use lead when there are so many good alternatives on the market in this day and age.

- **WDFW RESPONSE**
  Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

Keep non toxic to wetland areas & species only. Do not apply non toxic regulations to upland hunters ever!

- **WDFW RESPONSE**
  Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

(3 comments) NO

- **WDFW RESPONSE**
  Acknowledged. Thank you for your response.

NO new non-toxic restrictions, period

- **WDFW RESPONSE**
  Acknowledged. Thank you for your response.

No who do you think we are the radical State of California?

- **WDFW RESPONSE**
  Acknowledged. Thank you for your response.

Non toxic for pheasant other than on wetland release sites is a joke

- **WDFW RESPONSE**
  Thank you for your perspective.

Nontoxic shot should be heavily pushed and prioritized both for the safety of the environment and the hunter as a consumer.

- **WDFW RESPONSE**
  Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

(2 comments) Ok

- **WDFW RESPONSE**
  Thank you for your support.

Only where negative impacts are well documented

- **WDFW RESPONSE**
  Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

Other than in wetland, this is a thinly disguised effort by the anti-hunting public to further attack hunters and hunting. Time and resources are better spent on things that will make a difference for the better.

- **WDFW RESPONSE**
  Thank you for your perspective.

Show proof.

- **WDFW RESPONSE**
  Documentation of the effects of lead ammunition would be included along with any proposed changes to current rules.

Sure

- **WDFW RESPONSE**
  Thank you for your comment.
Why are you even debating this. Outlaw lead shot, we can easily live without it. | Thank you for your perspective. The measure was developed to advise hunters who may be unfamiliar with these birds.
---|---
Ban lead in fishing and hunting gear. There's plenty of evidence that lead shot is deadly. | Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.
---|---
Just require nontoxic shot use in the state of WA | Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.
---|---
Yes, please get the lead out as fast as possible. | Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.
---|---
you know enough to make these recommendations now -- get the lead out | Thank you for your perspective. The objectives in the plan are primarily to encourage voluntary use of non-lead ammunition or to work with hunters to develop restrictions that they can support.

<table>
<thead>
<tr>
<th>Objective 129: Post WDFW managed properties and distribute educational materials to hunters that describe the differences between upland game species and non-hunted upland birds each year.</th>
</tr>
</thead>
</table>
PUBLIC COMMENT | WDFW RESPONSE |
—a hunter knows --cut the waste | This approach was tried through the Eastern Washington Pheasant Enhancement Program but it appeared to have little effect as hunter numbers and harvest continued to decline. |
—by "post" I assume you mean put up signs rather than close access. Online test or other education may work | Yes this is the intent and thank you for the suggestion. |
(17 comments) Yes or agree | Thank you for your support. |
—I agree with this objective. | Thank you for your support. |
|] NO | Acknowledged. Thank you for your comment. |
[Social media | Acknowledged. |
—Support | Thank you for your support. |
Why to spend more money? | Thank you for your comment. |
Do hunters even pay attention to animals they're not supposed to hunt? I have a hard time trusting anyone with a gun who likes to kill animals for fun. | Thank you for your perspective. |

<table>
<thead>
<tr>
<th>Objective 130: Conduct research and include results in annual reports that describe efforts to evaluate habitat enhancement effects on pheasant population levels.</th>
</tr>
</thead>
</table>
PUBLIC COMMENT | WDFW RESPONSE |
—bring back bird farms it worked before | This cost of releasing pheasants is derived from a portion of the small game license sales dedicated to upland bird management. The department has a legislative mandate to have a release program in eastern Washington but the amount of funding for purchase of pheasants has been reduced based on an audit of the program which found that funds would be better spent on habitat enhancements. |
(15 comments) Yes or agree | Thank you for your support. |
—Consid | Thank you for your support. |
—I agree with this objective. | Thank you for your support. |
(2 comments) NO | Acknowledged. Thank you for your comment. |
—No more studies... | Acknowledged. Thank you for your comment. |
—Nope | Acknowledged. Thank you for your comment. |
(3 comments) OK | Thank you for your support. |
—Support | Thank you for your support. |
What habitat enhancement? Putting up a sign and then doing nothing does not help habitat. | Thank you for your perspective. |
Yes definitely! | Thank you for your support. |

<table>
<thead>
<tr>
<th>Objective 131: Continue to release rooster pheasants in eastern Washington at a level that devotes most of the fund income to habitat enhancements to produce wild pheasants.</th>
</tr>
</thead>
</table>
PUBLIC COMMENT | WDFW RESPONSE |
—Put and take of hatchery 'chicken' is dumb, and hunting these stupid birds is not very sporting. I somebody wants to do this, they should pay the entire costs of releasing them. | The cost of releasing pheasants is derived from a portion of the small game license sales dedicated to upland bird management. The department has a legislative mandate to have a release program in eastern Washington but the amount of funding for purchase of pheasants has been reduced based on an audit of the program which found that funds would be better spent on habitat enhancements. |
(18 comments) Yes or agree | Thank you for your support. |
—Consid | Thank you for your support. |
—I agree with this objective. | Thank you for your support. |
(2 comments) NO | Acknowledged. Thank you for your comment. |
—No more studies... | Acknowledged. Thank you for your comment. |
—Nope | Acknowledged. Thank you for your comment. |
(3 comments) OK | Thank you for your support. |
—Support | Thank you for your support. |
—spoke releases and put all funds into habitat. | The department has a legislative mandate to have a release program in eastern Washington but the amount of funding for purchase of pheasants has been reduced based on an audit of the program which found that funds would be better spent on habitat enhancements. |
—Again, releasing dumb pen-raised pheasants does nothing to help wild populations. | We do not encourage or support releases as a mechanism to increase populations. The releases that occur are only to increase harvest opportunities. |
—If you don't have the wild birds then you need to plant both sexes to build up the population. Just because they are pen raised doesn't mean they are totally stupid. The pen raised birds have all the same savvy and instincts that the wild birds do it just takes them a little longer to figure it out. But by planting hen and roosters some do survive and carry over. But roosters don't lay eggs so where will the eggs come from? | Released game farm birds have very high mortality rates and do not represent a good investment in increasing populations. |
—Increase frequency of pheasant releases and number of birds, the habitat is not as productive as it once was | Our opinion and research support that habitat enhancement is a more cost effective approach. An audit of the eastern Washington pheasant enhancement program arrived at the same conclusion. |
—Take some of your land money and put it into rearing birds. Individuals rancher' could be helpful | The department has a legislative mandate to have a release program in eastern Washington but the amount of funding for purchase of pheasants has been reduced based on an audit of the program which found that funds would be better spent on habitat enhancements. |
—Use all the $5 for habitat purchase and development, the pheasant release program is a joke. | The department has a legislative mandate to have a release program in eastern Washington but the amount of funding for purchase of pheasants has been reduced based on an audit of the program which found that funds would be better spent on habitat enhancements. |
(18 comments) Yes or agree | Thank you for your support. |
—bird farms work and farm birds will become wild if raised right just need more bird farms | Released game farm birds have very high mortality rates and do not represent a good investment in increasing populations. |
—Keep doing this | Released game farm birds have very high mortality rates and do not represent a good investment in increasing populations. |
—Keep doing this | Thank you for your support. |
—NO | Acknowledged. Thank you for your comment. |
(2 comments) OK | Acknowledged. Thank you for your comment. |
—RELEASE BIRDS INTO MORE REMOTE AREAS THAT REQUIRE A MINIMUM WALK/HIKE OF ONE MILE TO ACCESS. | Thank you for the suggestion. However this idea would probably be unpopular with a number of hunters who use the release sites. |
Should be releasing hens only | Released game farm birds have very high mortality rates and do not represent a good investment in increasing populations. |
—TOTAL WASTE OF MONEY AND AN INSULT TO MODERN WILDLIFE MANAGEMENT DEBASES THE ENTIRE HUNTING IDENTITY AND SPIRIT OF THE REAL HUNT. | The department has a legislative mandate to have a release program in eastern Washington but the amount of funding for purchase of pheasants has been reduced based on an audit of the program which found that funds would be better spent on habitat enhancements. |
Sounds okay to me. Personally I'm only interested in hunting wild pheasants. But if released birds take the pressure off wild birds, I'm all for it. | Thank you for your perspective and support. |
Pheasants are not endemic to North America the objective makes a distinction between birds that are raised on farms vs bred in the wild. We purchase birds from farms that raise birds to be as similar to wild birds as possible. We do not encourage or support releases as a mechanism to increase wild populations. The releases that occur are only to increase harvest opportunities.

Objective 132: Monitor license revenue generated and consider efficiencies and other changes necessary to make the program self-supporting.

PUBLIC COMMENT

A long range goal but not obtainable with current hunter satisfaction and access

WDWF RESPONSE

A survey in 2013 found that hunter satisfaction varied by release site and we will continue to attempt to make improvements in this area.

Objective 133: Secure at least four replacement and new release sites by 2021 and attempt to strategically locate them to increase interest and participation in the program.

PUBLIC COMMENT

get better pheasant habitat for release sites, no sage brush and rock, get grassy land, and cattails and kill coyotes at these sites

WDWF RESPONSE

The comment appears to be related to eastern Washington and the objective is specific to western Washington. Wild populations of pheasants in western Washington are minimal due to climate and habitat limitations.

Objective 134: Revise the distribution maps for select small game and furbearer species by 2017.
Small game license should be included free with big game. 

WASTE OF MONEY, THAT'S WHY IT'S CALLED HUNTING NOT HARVESTING. 

Acknowledged. Thank you for your comment.

Thank you for your support.

Thank you for your support.

Thank you for your perspective. 

Exception. 

Thank you for your perspective. 

We do engage our fisheries biologists on these topics and are aware of the benefits that beaver activity can provide. 

Thank you for your perspective.

This will always remain part of the criteria for release sites. 

Yes. Beaver help salmon and other fish, also maintain upland water supply through summer and flood control in winter. Keep them. Don't kill them. Like the wolf and cougar, beavers are essential to a healthy world. 

You might talk with him for help.

An assessment of sustainability and potential conflict would be required before this could be considered.

Where beaver are moved is should consider cougar numbers and the potential for failed relocation due to predation. 

Thank you for your perspective. These are the kinds of habitat that beaver relocation is intended to support. 

Protection beaver dams to provide more water habitat. 

Thank you for your perspective.

Release on quartz creek Klickitat county 

An assessment of suitability and potential conflict related to small game, furbearers and unclassified wildlife by 2017, and reduce the need for lethal removal of non-target animals without harm much more feasible. 

Past efforts to modify the initiative were not successful and would be difficult. Trappers have adapted to new methods and can be quite successful and interested in trapping in Washington has grown substantially over the past several years evidenced by an increase in the number of persons completing the trapper education course.

While attempts are being made to reestablish beaver in some areas harvestable populations are present in many areas and trapping in some areas can help to reduce conflicts with humans.

You might talk with him for help.

We agree with this objective.

I agree with this objective.

I agree with this objective.

I agree with this objective.

I agree with this objective.

I agree with this objective.

I agree with this objective.

We recognize that this will be an issue and automated phone reporting of fur harvest would be impossible. Some alternative harvest reporting method will be needed as an interim measure. 

We recognize that this may not be the answer in every circumstance.

We recognize that this may not be the answer in every circumstance.

We recognize that this may not be the answer in every circumstance.

We recognize that there are techniques that can be used successfully in many situations but we recognize that this may not be the answer in every circumstance. 

The revision of range maps is intended to assess the status of individual species where some level of concern exists that population declines may be at a level of concern. 

Objective 135: Current criteria for evaluating beaver release locations are mostly subjective. The documentation of beaver presence/absence prior to release and post release monitoring varies widely among projects. Develop stronger science based criteria for assessment of release sites and begin utilizing citizen observations of beaver activity to assess where projects are appropriate by 2016. 

PUBLIC COMMENT

If there are areas without beaver you need to consider there are probably good reasons why they are absent that are probably out of human control. Trapping is unlikely to be a reason beaver are absent

We recognize that beaver will not colonize areas where suitable habitat is not present and some areas are not capable of providing beaver habitat. The development of better criteria is intended to assure that beaver are not released in areas that are not suitable.

Appropriate in only limited areas, in most areas of western Washington beaver populations are exploding. When can we bring back trapping? Maybe now that the good people who voted out leghold traps are all getting flooded, they might reconsider.

Under the law adopted by the legislature beaver can only be relocated to areas in eastern Washington. Trapping in Washington is legal but body gripping traps are not allowed without special permits. Fur trappers have adapted and can be effective with other types of traps.

Interface with fisheries experts in regards to beaver release locations and need. Many species of fish including lamprey historically depended on habitat developed by beaver.

We do engage our fisheries biologists on these topics and are aware of the benefits that beaver activity can provide.

no release should take place that would negatively affect a private property owner.

These will always remain part of the criteria for release sites.

Yes. Beaver help salmon and other fish, also maintain upland water supply through summer and flood control in winter. Keep them. Don't kill them. Like the wolf and cougar, beavers are essential to a healthy world. 

You might talk with him for help.

Nuisance release

Where beaver are moved is should consider cougar numbers and the potential for failed relocation due to predation.

Acknowledged. Thank you for your comment.

Thank you for your support.

Thank you for your support.

Thank you for your support.

Thank you for your support.

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Thank you for your support.
This is problematic as decisions on level of hunting pressure (Table 2, page 64) are information for black-tailed deer which comprise a significant portion of the deer harvest in and mule deer in eastern Washington. Yet, there appears to be no past effort to collect this conditions". G. H. Collins, R. B. Wielgus, and G. M. Koehler. 2002. Effects of sex and age on black stomachs. In addition these WDFW hunts are in contrast to the Plans statement “there is a tendency banquet 'hunting seasons in spring to mitigate timber damage by bears". This policy counters scientific (Peebles et al. 2013). Issuing permits after a target number for management is achieved results in kill permits issued months after a ‘problem’ has occurred and unlikely to target and remove the individual responsible for the depredation or threat. In addition, the Plans statement “Provide Department-coordinated lethal removal to mitigate timber damage by bears"(which includes ‘hot-spot’) is counter to the statement “Where applicable, provide focused recreational bear hunting seasons in spring to mitigate timber damage by bears". This policy counters scientific findings that not all bears peel trees and that these hunts do not target ‘depredating’ or ‘offending’ bears(Collins, Wielgus, and Koehler 2005). These studies show that the wrong sex of bear is targeted and approximately75% of bears killed do not have bark in their snowtracks. In addition these WDFW hunts are in contrast to the Plans statement “there is a tendency to equate levels of human-bear interactions with bear abundance. However, bear conflict activity is not a good indicator of population status, as it more likely reflects the variability of environmental conditions". G. H. Collins, R. B. Wielgus, and G. M. Koehler. 2002. Effects of sex and age on black bear conifer damage and control. Ursus 13:231-236.G. M. Koehler and D. J. Pierce. 2005. Survival, cause-specific mortality, sex, and ages of American black bears in Washington state, USA. Ursus, the goal set by the Washington Department of Fish and Wildlife (WDFW) for the management of black-tailed deer, mule deer, and white-tailed deer populations in Washington is to maintain numbers within habitat limitations. And later Preserve, protect, perpetuate, and manage deer and their habitat to ensure sustainable populations. This is valid and justifi ed-habitat should guide deer and elk numbers. Contrast this with the cougar objective 88 "Manage for a stable cougar population in each PUMU". This cougar objective does not take into account whether the "habitat", i.e., prey base, can support that objective! The deer objective should also include managing other mortality factors such as highway mortality and predators because just…”manage deer and their habitat…"alone may not help WDFW reach the objective. This comment equally applies to all species, the suite of factors need to be managed, with priority consideration for managing those factors that yield the largest response at the least cost.

Mule deer strategies

Unfortunately we cannot comment on the strategies since they are not included in the draft.

Deer Population Status and Trend

The stated total deer population in Washington is approximately 300,000 – 320,000. Yet for both black-tailed and white-tailed deer the information on pages 64 and 66 indicate that there is no current method being utilized to estimate populations. Is the approximate population of deer based on recreation from harvest? The black-tailed deer composition surveys result in such variability, that it is hard to make inferences from it. That is one reason we initiated a major research project on black-tailed deer. It is about half way through and will bring us results in a few years to improve our monitoring of black-tailed deer.

Data Collection

We notice that pre-hunt and post-hunt composition surveys are being conducted for white-tailed and mule deer in eastern Washington. Yet, there appears to be no post effort to collect this information for black-tailed deer which comprise a significant portion of the deer harvest in Washington. This is problematic as decisions on level of hunting pressure (Table 2, page 64) are supposedly based on this data annually.

First weekly page number 119 in the document.
**Population Management**

The recreational goal for deer is to maintain or increase hunting opportunity. We note a lack of consistency between elk and deer regarding the application of RCW 77.04.012 which is highlighted appropriately on page 50 for elk but not mentioned for deer. Maximizing recreational harvest should be a driver for deer as well. Recommend the sentence states “...goal for deer is to maximize hunting opportunity”. Black-tailed deer in particular are struggling in the areas under Mukah management, maintaining current hunting opportunity on a diminished population is not an acceptable goal.

**Black-tailed Deer**

**Background**

It appears that Table 3 is not included in the document which would reflect an estimate or index of the abundance of animals in the population available for harvest. We also note that there is a Table 4 in this section that is not referenced, but may have been what was referenced as Table 3. Regardless, the information in Table 4 does not match the stated intent of the referenced Table 3. The background section does point out that black-tailed deer populations appear static and that the population may have declined somewhat over the past two decades. We concur with these statements, but believe the decline may be underestimated when the metric used is simply hunter success. The stated lack of data on population size and the lack of consistent composition data collected (see comments on Data Collection, page 63) essentially indicates that hunting regulations are being set, primarily advocating a liberal season structure, without regard to the status of the population.

We are also deeply troubled that the similar to elk, habitat issues are the only factor listed that may be regulating deer populations “Black-tailed deer habitat has been reduced in western Washington due to human encroachment, a reduction in timber harvest, and the natural progression of aging timber stands (succession)”. Undoubtedly deer are limited by conversion of forestland from development, but are resilient and occupy habitats within many small towns and outlying areas of many communities in western Washington (Ocean Shores for example). Largely, this places them in conflict with landowners and precludes hunting as a tool for management. Large blocks of industrial timberland exist over much of western Washington that provides habitat security and shorter rotations now than historically, minimizing the amount of forest that forest succession limits forest. The only reductions in timber harvest are on U.S. Forest Service lands, which are cited for elk was considered a minor impact (seems contradictory sense both species have similar habitat needs). We agree that the intrinsic value of the forage in western Washington plays a significant role in regulating deer populations, but no evidence exists that current populations are at carrying capacity. The Mukah Tribe has conducted specific research with black-tailed deer as we noted ten years ago that deer numbers appeared to be declining. Our research found that population studied had a growth rate of zero over 4 years, due to poor fawn recruitment (McCoy and Murphy, in press). Predation was the primary mortality factor which to a degree was compounded due to the intrinsic limitations of the habitat, but a component of predation was additive. Hair Loss Syndrome (HLS) was documented to be a factor limiting overwinter survival from increased predation rates on afflicted fawns. This research found that in the absence of HLS, the population would have grown. We are particularly disturbed by the lack of any mention of HLS in the background which has been documented to be prevalent in the population and suspected as a limiting factor in WDFW documents (e.g. 2003 Status and Trend Report). It would seem any objective should be developed that deals with monitoring hair loss incidence rates in deer. In areas with high incidence rates, fawn recruitment is likely limiting population growth. This data could be collected in conjunction with annual post season composition surveys. We also are concerned that predation is not mentioned as a potential limiting factor. Cougars were the primary predator of deer fawns over the entire first year of life in our research (contributing to no population growth) and the cougar population has returned to healthy levels (page 19, draft GMP). We believe cougars, in particular, at their current density on the landscape are limiting deer populations at their current level (which we believe is much lower than 20 years ago). Without any mention of this, we have concern that the population would be regulating. We are concerned that predation is not mentioned as a potential limiting factor. Cougars were the primary predator of deer fawns over the entire first year of life in our research (contributing to no population growth) and the cougar population has returned to healthy levels (page 19, draft GMP). We believe cougars, in particular, at their current density on the landscape are limiting deer populations at their current level (which we believe is much lower than 20 years ago). Without any mention of this, we have concern that the population would be regulating. We are concerned that predation is not mentioned as a potential limiting factor. Cougars were the primary predator of deer fawns over the entire first year of life in our research (contributing to no population growth) and the cougar population has returned to healthy levels (page 19, draft GMP). We believe cougars, in particular, at their current density on the landscape are limiting deer populations at their current level (which we believe is much lower than 20 years ago). Without any mention of this, we have concern that the population would be regulating.

**Recreational Opportunity**

Eastern Washington mule deer seasons have been much more restrictive since 1997. Some of the restrictive measures include: a three-point minimum restriction for all mule deer in eastern Washington and a shortened deer hunting season for most hunters. (page 62)

In our opinion this decrease in mule deer population is caused by cougar depredations and the effect of increased elk populations. In the last few years the mule deer have moved into the agricultural lands for self-preservation from the cougars.

**Data Collection**

WDFW needs to conduct more population surveys on deer as baseline and current populations are very lacking. These studies are paramount to carnivore/prey management.

**Elk and Deer Sections**

We have not had any indication that predation is a significant limiting factor for bighorn sheep or mountain goats. If we do, we can address it through the predator-prey guideline section of the plan.

**Bighorn Sheep Section**

We recommend that the Bighorn Sheep and Mountain Goat Sections also include the predation management section similar to that in the Elk and Deer sections. Predation is never mentioned in the Mountain Goat section. We have documented predation on mountain goats by radio-marked cougars. Despite goats spending a lot of time in escape terrain, they also move between areas and are vulnerable to predation. Ignoring predation as a potential limiting factor in goat recovery is naive.

**Mountain Goat Section**

A recently completed long-term research project did not show that predation was a significant factor restricting mountain goat population growth.

**Table 1** Of these, 6 species are classified as game species. The table has only listed as game animal, what is the sixth?

We corrected the number to five. Thank you for your help in correcting this error.

Thank you for your support of these strategies. At this point we have not seen any indication that mule deer numbers are in decline. The only place where they are considered at lower levels than recent history is in the Yakima, Ellensburg area. This population has been affected by a type of hair slip, but might be a candidate for more work to determine the limiting factors and improving population estimates. The strategies identified in this plan would accommodate additional work as funding is available.

Thank you for catching the problem with the tables, it has been corrected. We don’t disagree with most of what you stated, but feel that the plan would allow management strategies to address most of the issues you identified or to better understand some of those issues. We greatly appreciate the work done to understand the impact of hair slip and have identified it as an issue to address in the future.
Among sportsmen and women in Washington the motives and reputation of those influencing policy at WDFW and in State government are suspect. Increasing transparency and... working honestly as an agency to ensure all wildlife management decisions are based upon the best available science and are not influenced by special interests or other political pressure is the only answer to fixing that... if you folks really want to do so. The citizens and wildlife in Washington will benefit greatly. Take a step back and look at the "good old days" and realize that, in many ways we have come a long way but... other we seem to have lost our focus on a truly awesome opportunity to develop a real appreciation of outdoors, wildlife, and the habitat to our children and grandchildren. The wonderful steelhead fishing will never be experienced by my children or theirs, let's learn from the mistake we made by short-changing that and protect the future of hunting. Overall I think the major stuff is well managed, I do believe there is too much political influence in some arenas or a lack of participation by a wildlife agency who is proud of what they do and is willing to stand up and be counted and to defend themselves instead of rolling over. Purely my opinion obviously. I started enjoying the outdoors here in the 1950's and have hunted, fished, and guided hunters and fishermen in seven states and three Canadian provinces. I had my own sporting goods store and, as a result I love the outdoors and what our state has. Let's turn the How around and let our people pay we pay to harvest on my land during rifle season. I live in 651, right in the middle of an elk hotspot where agriculture damage is rife and public safety when elk cross SR 12 is compromised, and why there is an archery season and no M/L season is beyond me. Please take archery and semi-developed farmland areas as an option, specifically in 651, and put M/L back. I can anchor an elk in place no prob with my arms.

Archery early Season Sept 8th to 21st

This recommendation and others will be evaluated during the 2015-2017 three-year hunting season package development.

Archery seasons need to be reduced, and constricted to areas which are mostly wilderness and open land, like timber company, large public areas, etc. Reason this is a problem is animals shot with an arrow usually travel a considerable distance before dying and get on someone else's private property where they cannot be retrieved. I live in an area of abundant elk on 80-120 acre farms, and this has happened to me several times where my neighbor has allowed a bow hunter on his property and the dead animal wound up on mine. No, I did not let him trespass, I turned the carcass over to Game Department. Worse yet, that was a nice 5 point bull that my family won't get to harvest on my land during rifle season. I live in 651, right in the middle of an elk hotspot where agriculture damage is rife and public safety when elk cross SR 12 is compromised, and why there is an archery season and no M/L season is beyond me. Please take archery and semi-developed farmland areas as an option, specifically in 651, and put M/L back. I can anchor an elk in place no prob with my arms. I can never be done with an arrow. Thanks.

As a hunter education instructor, I can't help but feel the number of interested hunters in Region 5 is going to deteriorate significantly when the timber company charges for admission into the woods. I'm a bit confused at the Department's indifference toward the pay for play scheme that is being set up in Southwest Washington. Why hasn't the Department gotten involved politically in this issue?

As a recurring theme throughout all aspects of this game management plan, I believe one of the top goals should be to work with all involved agencies to increase available habitat and to increase food sources for the wildlife. Habitat loss and infringement by urban sprawl is making the states ecosystem less stable. These have impacted the total numbers of wildlife and have lead to more human/wildlife conflicts.

As you can most likely tell my attitudes about hunting in Washington are terrible. I have hunted in my state since age thirteen, I am now 51. This is most likely the last year I will hunt big game in Washington. All my life I have suppose to deal with permits, fees and all the mess. As a recurring theme throughout all aspects of the game management plan, I believe one of the top goals should be to work with all involved agencies to increase available habitat and to increase food sources for the wildlife. Habitat loss and infringement by urban sprawl is making the states ecosystem less stable. These have impacted the total numbers of wildlife and have lead to more human/wildlife conflicts.

Elk seasons in 568, 574 and 578 units have been drastically changed for muzzle load season since 2009. Any elk bag limit changed to 3 point or better, pushing back the early season a week, shortening the late season to just 4 or 5 days (used to be three weeks) and giving muzzle load hunters less days in the field than rifle hunters. Rifle hunters get 12 days in a row. Is this an effort to shortening the late season to just 4 or 5 days (used to be three weeks) and giving muzzle load hunters less days in the field than rifle hunters. Rifle hunters get 12 days in a row. Is this an effort to... to discourage the use of fees and seek resources that might allow us to offer better incentives to landowners to keep lands open to all hunters.

Create incentives for timber companies to re-open their land to free access. Form local volunteer groups to help police their land and limit vandalism and dumping. Restrict the issuance of damage control permits to timber companies not willing to play ball

Currently my only comments are regarding "wolf management" and I repeat that I strongly support the decision NOT TO INCLUDE WOLVES IN THE GAME MANAGEMENT PLAN for 2015-2021 because their numbers have not come close to recovery or dispersion and are not likely to during this management period.

During this questionnaire, the words study, monitor, and evaluate are used all too often. What the residents of Washington need is action. Action on addressing howu reddit. Action to curb poaching. Action on repealing the ridiculous wolf plan that leaves Eastern Washington residents to suffer while the rest of the state catches up. This department appears to be hamstring by bureaucracy. It's time you step up and do your job in protecting the resources of Washington State while offering.

Eastern WA, male deer season should be two weeks long or at least one week later for E/M fire arms.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

ELK hunting statewide would be a great benefit

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

ELK seasons in 568, 574 and 578 units have been drastically changed for muzzle load season since 2009. Any elk bag limit changed to 3 point or better, pushing back the early season a week, shortening the late season to just 4 or 5 days (used to be three weeks) and giving muzzle load hunters less days in the field than rifle hunters. Rifle hunters get 12 days in a row. Is this an effort to force everyone to rifle hunt? No this is not an effort to force everyone to rifle hunt. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

We want to keep the hunting access that we have in 2021 because their numbers have not come close to recovery or dispersion and are not likely to during this management period. As a recurring theme throughout all aspects of this game management plan, I believe one of the top goals should be to work with all involved agencies to increase available habitat and to increase food sources for the wildlife. Habitat loss and infringement by urban sprawl is making the states ecosystem less stable. These have impacted the total numbers of wildlife and have lead to more human/wildlife conflicts.

I do not hunt cougar, but in my opinion that their numbers have increased drastically after the vote to quit using dogs... encourage more people to hunt. Please review the comments and management objectives identified in the cougar section.

Thank you for your observations and support for the agency and the intent of this plan.
I feel that our black-tailed deer and Roosevelt elk are in trouble from many different forces including disease (foot rot and hair loss), habitat loss, loss of food, over-hunting, and extremely high predator numbers. We must change the way we manage these species by fixing some of the problems and reducing the hunter harvest and increasing predator control. By doing all of these things the objectives laid out in this plan of increasing hunter numbers and hunter retention will take care of themselves and along with that will come increased revenue. But if we continue to keep the same management plans and do nothing to change this important issue the revenue stream of deer and elk hunters in western Washington will slowly dry up and those hunters will take their dollars elsewhere and won't come back because they will find that the grass is truly greener in surrounding states when it comes to deer and elk hunting.

Habitat loss and disease are challenges that WDFW is contending with when it comes to managing black-tailed deer and Roosevelt elk. There is no indication form survey data and harvest data that deer and elk are being overhunted, although the recent hunting seasons were designed to reduce the elk population numbers in SW Washington. That reduction has been accomplished. See objective 3 as it relates to predation-prey management.

I put many of these into a letter last year to the wildlife commission and never received a response. That is kind of poor customer service. Anyone who writes a multiple page letter with comments and compliments on WDFW work and addressing real issues should at least get a form letter back — you think?

Thank you for your comment.

I think that the WDFW needs to come into the 21st century and allow mechanical broadheads in the state. The new technology in mechanical broadheads has advanced so much that the provide and more ethical kill the fixed. Saying that we need to stay traditional is a myth. We are using compound bows that are not anywhere near traditional.

This is a hunting season proposal and not a game management plan issue.

We encourage keeping fees low and to not limit the number sold. We have also responded to a number of elected officials concerned with the situation providing a number of options for considering.

If you have any access to hunting lands to hunt these are all mite points. I have purchased a hunting license and have applied for special permits since I was 16 years old. I am now 54 and have no plans to stop purchasing any license at this point. It is a sad day the day your Department is taking on access to hunting lands. While I understand private land ownership is just that, the direction your department is going to help improve hunting opportunities has led me to not purchase any license. I am sad for my grandchildren who are having their hunting opportunities sold to the highest bidder on private lands. It seems to me that the state is allowing for privately land owners to sell the public owned animals to the highest bidder. While some find that the closing of these lands to permit access seems to be a great opportunity others are being chased out of the sport all together. If you hunt in groups of 4 or 5 people and all are at the will of the private timber companies then it is highly likely that we will not be able to continue that tradition. You will have to attempt to each purchase a permit. This could set up a scenario that 4 out of the 5 could get permits and the 5 could be left out if not able to purchase. It really does feel that the State's public natural resources are being sold to the highest bidder. I for one will never purchase a permit from a private timber company and reward them for closing their lands. I hope some smart heads in the legislature will change the laws concerning private lands and the terms of public access for their tax structures. Your department could be a leader in this. I feel your revenues could fall given the access opportunities. Not all people can afford any more fees to even be able to enjoy the sport of hunting. And with the direction your department is going it seems that is even going to become more difficult. If any private company sold you a permit hinging on you obtaining access to a private company and then would not refund that item when access was not obtainable they would be sued. Quite the racket the State has. I hope that enough people feel like me and do not purchase license and permit. The only way things will change if enough people close their wallets to make their voices heard. Maybe I have this all wrong and you are already working on a plan.... My group calls me the optimist. Time will tell. Please try to change the direction that this is heading for all the children who may not get to experience the great outdoors without having a big enough billfold to foot the bill.

I'm 60 years old. Get reduced license fees even disabled idont get much help short vendors cost me money i can't get back older people wrong. Permits. Thank you for your comment.

Increase bug limit on scarp below Bonneville Dam to 7.

This will occur if populations increase to allow additional harvest opportunity.

It seems the department is hell bent on reducing the numbers of hunters and opportunity to harvest game buy increasing fees, decreasing seasons and putting them so early that the chances of harvest are extremely low. You provide a good summary of the issues involved with regard to access on industrial timberland in western Washington. We have been working to try to influence company policy and at the same time keep fees low and to not limit the number sold. We have also responded to a number of elected officials concerned with the situation providing answers to their questions and our perspectives on changes that may help address the situation.

If you think?!

If you don't have any access to lands to hunt these are all mite points. I have purchased a hunting license and have applied for special permits since I was 16 years old. I am now 54 and have no plans to stop purchasing any license at this point. It is a sad day the day your Department is taking on access to hunting lands. While I understand private land ownership is just that, the direction your department is going to help improve hunting opportunities has led me to not purchase any license. I am sad for my grandchildren who are having their hunting opportunities sold to the highest bidder on private lands. It seems to me that the state is allowing for privately land owners to sell the public owned animals to the highest bidder. While some find that the closing of these lands to permit access seems to be a great opportunity others are being chased out of the sport all together. If you hunt in groups of 4 or 5 people and all are at the will of the private timber companies then it is highly likely that we will not be able to continue that tradition. You will have to attempt to each purchase a permit. This could set up a scenario that 4 out of the 5 could get permits and the 5 could be left out if not able to purchase. It really does feel that the State's public natural resources are being sold to the highest bidder. I for one will never purchase a permit from a private timber company and reward them for closing their lands. I hope some smart heads in the legislature will change the laws concerning private lands and the terms of public access for their tax structures. Your department could be a leader in this. I feel your revenues could fall given the access opportunities. Not all people can afford any more fees to even be able to enjoy the sport of hunting. And with the direction your department is going it seems that is even going to become more difficult. If any private company sold you a permit hinging on you obtaining access to a private company and then would not refund that item when access was not obtainable they would be sued. Quite the racket the State has. I hope that enough people feel like me and do not purchase license and permit. The only way things will change if enough people close their wallets to make their voices heard. Maybe I have this all wrong and you are already working on a plan.... My group calls me the optimist. Time will tell. Please try to change the direction that this is heading for all the children who may not get to experience the great outdoors without having a big enough billfold to foot the bill.

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Increase bug limit on scarp below Bonneville Dam to 7.

This will occur if populations increase to allow additional harvest opportunity.

It seems the department is hell bent on reducing the numbers of hunters and opportunity to harvest game buy increasing fees, decreasing seasons and putting them so early that the chances of harvest are extremely low. You provide a good summary of the issues involved with regard to access on industrial timberland in western Washington. We have been working to try to influence company policy and at the same time keep fees low and to not limit the number sold. We have also responded to a number of elected officials concerned with the situation providing answers to their questions and our perspectives on changes that may help address the situation.

If you think?!

Look closely at things that already work well in the state and incorporate them into other areas.

We always try to learn from our successes and apply them to other areas and situations. Thank you for your perspective.

Late season (salmigratory) hunts should have consistent starts to reduce high hunter density areas time low. If you would look at the elk chapter of this plan that you are commenting on, you will see that the elk harvest in 2012 was at an all-time high for the past 13 years.

That late season is a function of the Thanksgiving holiday calendar shift. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

We encourage keeping fees low and to not limit the number sold. We have also responded to a number of elected officials concerned with the situation providing answers to their questions and our perspectives on changes that may help address the situation.

If you think?!

Let's completely recover wolves and other predators first, and restore a resemblance of a natural order to predator-prey relationships before wasting money developing plans of “managing” or culling wolves or other predators that might make elk hunting more challenging or might take an occasional calf.

Wolves continue to managed under the wolf conservation and management plan, please see the appropriate sections for the responses to wolf management and predator/prey comments.

Most of what I have just read seems to be political payo-bubble for: I need to justify my job. I am not sure what came up with these questions/statments, but they seem to be worried about proving the need for their employment.

Most of the questions and comments come from the public. WDFW is committed to addressing the key issues identified by the public for management of game species.
Move early archery elk season back to the 8th - 21st or have it start on the 2nd Saturday of September. With the season starting so early in September such as this year, we risk having property shut down for fire danger and more importantly the risk of meat spoiling before we can get it out. It reduces the amount of area we can hike into in the wilderness so we can get the meat out before it goes bad. I feel if we can get the start date moved back it could allow bow hunters more land to hunt due to cooler weather without risking the loss of meat.

This recommendation and others can be evaluated during the 2015–2017 three-year hunting season package development.

Name: Acknowledged

Note: This can not be done because there would be too much potential for harvest to be controlled and there would need to be a way to manage these populations. It should be a joint effort to work with landowners to encourage them to hunt in the best interest of the species.

Thank you for your comment and perspective.

Over all I believe the WDFW is not doing the best job at all. It is very difficult to manage game in any state. My only concerns especially as an archery hunter are that WA is losing archery hunters to other states that offer a much better hunting experience with longer seasons and the ability to actually hunt during the elk rut season. I'm not saying we need to hunt the end of September, I believe that going back to the start and end dates of Sept 8th to the 21st will keep archers here in WA and will help them have more opportunity at harvesting branch antlered bulls. Archers are far behind MF and ML branch harvest numbers when you include permit hunts!

Overall doing good job. Listen to public and field officers more and keep long tenured employees instead of throwing graphics and assignments and working on different teams as well as streamline management.

This recommendation and others can be evaluated during the 2015–2017 three-year hunting season package development.

Name: Thank you for your comment and perspective.

pay to hunt is the worst—land owner making us pay for hunting would be fine if I was shooting coyotes. As it stands, you can not hunt coyotes. Which is tough for the townies or other people who sometimes need to use their cars to get around. We feel this road was closed to keep the Nez Perce people out of that area do to the flood and the closure.

We are concerned with the fee access issues and the plan contains a number of strategies that we may use to try to encourage landowners to allow access for all hunters.

Please consider doing away with whitetail deer antler point restrictions in northeast gen's 117,121. I feel that the current 4 point restriction is to much. The terrain is to dense in a lot of areas for effective point counting. This hurts hunter participation in these units and makes the surrounding units that much more crowded. Possibly drop to 2 point minimum.

This recommendation and others can be evaluated during the 2015–2017 three-year hunting season package development.

Name: Thank you for your comments, please review the appropriate sections of the plan to see how these recommendations might be addressed.

Predators need more control in this state. WA does not strive to limit hunters who are trying to hunt coyotes. First WA makes use of dogs illegal for coyote hunting, then tries to make night hunting illegal and now wa wants to push to make coyote hunting contests illegal; these are all very wrong moves. Taking away opportunity is not what you should be doing, especially in a time when predator numbers are so high.

WDFW does try to maintain reasonable hunting opportunities. Please recognize that the Commission’s decisions and department recommendations on topics like the ones you describe are often based on public comments. There are no current plans to change seasons or rules for coyote hunting.

Please consider wildlife connectivity via corridors or preserving habitat. All decisions in this plan should consider the long-term impacts of human development via development with other governmental agencies.

We see the potential for increased public access to lands that are currently not open to public access. This potential for additional public access is a co-management opportunity, and we look forward to exploring this with others.

Please contact me in regards to domestic sheep and goat control with bighorns.

Thank you for your response provided in the wolf section of the plan.

Please follow the State Conservation and Management Plan for gray wolves. We are still an endangered species, and though they are managed in the plan game division, they are not a game species.

WDFW is not giving those permits you mention to the timber companies. We are aware of the difficulties with the new access policies being implemented by private timber. Some hunters are willing to pay those access fees to private landowners.

PRESSURE THE FOREST SERVICE TO REPAIR THE ROADS IN THE NACHES AREA THAT WERE FLOOD DAMAGED! THEY WERE GIVEN THE MONEY TO FIX THEM AND CHOOSE TO USE IT ON OTHER PROJECTS! THAT SHOULD BE INVESTIGATED! IT HAS FORCED THE HUNTERS HUNTING THE YAKIMA HERD GMU 346 INTO A SMALLER AREA, PUTTING MORE PRESSURE ON ELK IN THAT AREA!

WDFW is not aware of the road repair funds that are available to the USFS. Work directly with the local Ranger District to get the road open.

Quit giving cow elk-quality elk bull elk quality deer permit to timber companies who refuse to let people hunt without one of their permits.

WDFW is not providing the revenue that they provide to timber companies to do the research and management that they do. This recommendation and others can be evaluated during the 2015–2017 three-year hunting season package development.

Please consider do what you can to pressure the USFS to open more creeks and rivers for catch and release fishing.

Fishing seasons and rules are beyond the scope of the game management plan.

Name: Thank you for your comment and perspective.

Remove all lethal options for "wolf management" vs a viable livestock predation or population control. The burden is on private industry to ensure ethical, straightforward, readily available non-lethal deterrent options, and any further depredations should be considered the cost of doing business in a wild environment. Government agencies should not be in the business of compensating private industry for wild known risks or environmental factors.

Thank you for your comment. Livestock producers with active Damage Prevention Cooperative Agreements employ a variety of non-lethal measures as part of their agreements with WDFW. Additionally, WDFW provides a check list of non-lethal measures, tailored to specific ranches, that livestock owners must follow as a step toward qualifying for compensation for wolf depredation. WDFW follows a strict protocol which outlines the events that must occur before WDFW will consider removing wolves identified as preying on livestock.

Stop wasting so much time and money on over studying every thing that we may use to try to encourage landowners to allow access for all hunters.

WDFW will be revisiting access requirements related to damage assistance provide and is and will be seeking resources that would allow us to offer more attractive incentives to landowners to encourage public access.

Remove or reduce bear damage permits for large forest Landowner if no public access is granted or other incentives for free public access.

WDFW will be revisiting access requirements related to damage assistance provide and is and will be seeking resources that would allow us to offer more attractive incentives to landowners to encourage public access.

Re open the 4320 road in the Blue Mountains during Archery season. This road was closed last year with out any notification other than 2 days before the archery season opened. All of our tree stands were locked up with no way to retrieve them. We were told that the road was being closed do to Elk being run off do to vehicle traffic. This is not true. WE, my hunting group (3) all of us from 65 to 84 have been archery hunting there for over 15 years and have yet to see a elk run over 200 yards from a car. We feel this road was closed to keep the Nez Perce people out of that area do to the area being full of trophy bulls that they kill here. Locking the gates on both ends of the road did nothing to them. They have skeletons for the Forest Service locks. Feel free to call me and I will explain this.

Work with your local USFS Ranger District to determine the rationale behind the road closure.

Reduce or remove bear damage permits for public forest user if no public access is granted or other incentives for free public access.

WDFW will be revisiting access requirements related to damage assistance provide and is and will be seeking resources that would allow us to offer more attractive incentives to landowners to encourage public access.

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Stop wasting so much time and money on over studying every thing that we may use to try to encourage landowners to allow access for all hunters.

Thank you for your comments, please review the appropriate sections of the plan to see the responses associated with your concerns.

Take the 4pt man off white tail deer hunting. We have had this for a couple of years now and I believe this has been long enough to allow the younger bucks to grow.

This recommendation and others can be evaluated during the 2015–2017 three-year hunting season package development.

The agency responds to issues so slowly they are not effective managers of the wildlife resources of the state.

Thank you for your comment.

The current Early Archery Elk Season is a waste of time for hunters. The chance of killing an Elk from September 2nd to the 15th is very scant. The odds of killing an Elk during the last two weeks of September is also very low. When it comes to heard numbers, I can’t see any common sense reason for not letting us hunt the last two weeks of September. I would rather hunt the first two weeks of October then the first two weeks of September. Can we please think about changing the Archery Elk Season to the first two weeks of October.

This recommendation and others can be evaluated during the 2015–2017 three-year hunting season package development.

The game commision needs to be more diversified. They are now stronger in fish management and there is a need for commissioners who are more knowledgeable in Big Game strategies to help with big game.

Thank you for your comment.
The hunting areas need to be revised because of population growth in unincorporated Pierce County. Hunting is currently allowed too close to residential areas in the Wilkeson, Bonney Lake and Carbonado region. Work with your local WDFW Enforcement agent and explain your concerns to them.

The most important thing you can do is get off your high horse attitude, come to a table to discuss each area concerns with there interests and objectives in mind. Coming to an area when your moods are already made up only stirrs controversy and distrust. We see you in action and distrust you at this point. We enjoy the outdoors and see that your decisions often do good for environmentalists (big money) but do a poor job of management. Example Loomis forest habitat which is now a mess. Weed control on your untaxed lands, take care of what you got before gleaning more land. Step up to be a good state land manager as most land owners do. We see your regulations on us and look across the fence to state land that is poorly managed.

The mule deer info is wrong Yakima had a rifle season to the last day of October. We had more deer and moose hunters. Now fewer deer and fewer hunters.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

The taxpayers need to be in the loop when any significant actions are to take place where all predatory animals are concerned, that means ANY ACTION!!

Agreed, please see the predator/prey section of this plan.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

There are too many quantifiers in this plan that relate back to increasing in numbers and far too few that relate to an increase in a quality hunting experience. Everybody and their brother could buy a hunting license next year, but if their experience sucks they will never want to hunt again. There are too many quantifiers in this plan that relate back to increasing in numbers and far too few that relate to an increase in a quality hunting experience. Everybody and their brother could buy a hunting license next year, but if their experience sucks they will never want to hunt again. We agree for the most part, see the appropriate section of the plan for additional responses.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

This plan is excessive in nature. How much staff will have to be added and at what cost to take on all of these new endeavors. I think you are missing the point here and way too much of this is aimed at managing people instead of wild life. Easy to understand laws that apply to everyone, like it or not. Can't make everyone happy, so quit trying, or suggesting you're trying. Wildlife-human conflict....hogwash. Human encroachment is the problem, not the wildlife. That should be the well known saying. Like I say, empower the landowner to reduce or eliminate their complaints. That's how it should be anyway and you guys know it but cow tow to the special interest groups to the point you lose conviction and willingness to do the very job you have been entrusted to do. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

The use of the current one week side tag system does not meet the needs of hunters who wish to change locations during the hunting season, also most of your hunts for 65 and over are on the east side of Washington and not all hunters are able to take advantage of these hunts why isn't there equal opportunity on the west side of the cascade range. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

There is no mention of managing sharp-tailed grouse and sage grouse so they may once again be hunted, even if at a modest level! Also nothing about similar management for white-tailed jacks. Recovery efforts are ongoing for these species and if recovery goals for those species are met hunting seasons may be considered. These species are not discussed specifically as we will not anticipate that sufficient recovery will occur during the six year timeframe this plan is intended to cover.

When implementing any of the previous objectives, I think the WDFW should give the hunters a chance to respond, through surveys and meetings, to how the objectives are being put into place. This survey was one mechanism used to gather public input on this plan. In addition a scouring process was included for the public to bring forth new ideas that they want addressed and six public meetings were held across the state. Statewide public meetings are also planned in the development of the next three year season package.

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Why not work with the timber companies to let the Master Hunters have free access permits for the very reason I thought your lands trying to help them clean up, turning people stealing wood, and just causing damage to their lands. If we need to do so many hours a year in order to get the permit...fine, let us know what we have to do. But until the WFW reverses their tactics of screwing the Master Hunter out, there is no chance I or many volunteers to help out. We appreciate your efforts but our efforts to secure hunting access do not tend to favor any individual group of hunters. If we were to do this, programs like the master hunter program would quickly lose support. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Wolves should remain on the state endangered species list. Wolves, cougars, and coyotes that are claimed to be killing livestock need to have scientific methods applied to verify that: 1) it really was a wolf, cougar or coyote kill, 2) show that the farmers/ranchers have taken precautions/followed the generally accepted principles of preventing such conflict, before any removal of the predator. Please see the responses provided in the wolf section of the plan. There has been no mention of a wolf hunt.

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Year after year individuals get drawn for multiple tags of the same species during the special permit process. This strategy was drawn for a quality bull tag, and a cow tag. Since I can only harvest 1 elk, 2 of these special permits will be wasted. Not only does it effect the herd management it also takes away from other hunters who were not drawn. One suggestion I have to change this misfortune is to only allow a hunter to be drawn for one special permit per species. When the hunter submits multiple applications for one species they should be able to place them in an order and if they get drawn for one then they can't get drawn for the remaining permits. Please see the responses provided in the wolf section of the plan. There has been no mention of a wolf hunt.

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Access to public lands that is limited by private parties is greatly needed. When people prevent access to public lands by blocking access by whatever means, they should be fined. WDFW does respect the rights of private landowners to control access on their property. Strategies are included in this plan that will attempt to prioritize and facilitate access to public lands that currently landlocked and inaccessible.

Add a goal is to improve quality of the hunts by reducing the number of hunters in a given hunt which will increase harvest rates and quality of animals harvested (ie, consistent starts for general hunts rather than staggered seasons). WDFW has accommodated this goal by offering quality special permit hunts.

Allow 209 primers on muzzle loaders. If you worried about shooting distance keep the iron sights but if with match caps and .308 caps a muzzle loader still shoots 200 yards. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

As a 60 year old, disabled I feel mad about get reduced fees I've hunted since 16 years old Providing reduced fees for seniors would substantially reduce revenue and funding for conservation and management actions by WDFW.

Do away with allowing hunting for deer and elk. You give use point restrictions in whitetails but then allow baiting? This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Early season elk is way to early. It make harvest unethical do to heat conditions needs to go back to a sept. Week 2 start date. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Eastern elk season should start the same as general elk season if must be shorter then cut of mid week. Typically the regional staff recommend the cow seasons start later to improve the chances of hunters holding bull special permits. This has been the case for a long time. This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Farmers/ranchers/etc, that are unwilling to take the steps to minimize predator conflict and/or do not allow verification of what cause the animal's death should not be eligible for reimbursement for livestock or other losses. All of these concerns are addressed by the Wolf Conservation and Management Plan.
I do not want Washington’s wolves hunted and that it is inappropriate for the Department to consider this as the only possible designation for wolves after they reach state recovery goals. This would provide a better hunting experience for everyone.

I think that tag numbers should decrease. Each GMU should receive a maximum amount of tags each season for each species. These will be drawn similar to opportunity for special permits are drawn. This would be a reasonable fee for access. Hunters hunting with access fees as long as they stay reasonable. The reality is that my wife and I find it more enjoyable than spending my experience on state land or free access areas. There is a lot less BS, the Department needs to do away with spike and true spike only and make it two point minimum and increase to three point minimum. You will have a much better hunting experience for everyone.

Open cougar seasons to allow for more complete predator control. Keep coyote hunting derbies as a fun attractant to hunting and a good predator management tool.

Remove opportunities for future classification of the wolf as a “game” animal. Due to high intelligence and strong emotional capacity, the classification of the wolf as a game animal would be highly unethical.

Stop timber companies from keeping key tax payers from being able to access public lands. WDFW does respect the right of private landowners to control access on their property but strategies have been included in the plan to try to address the issues related to landlocked public lands.

The controlled hunt seasons for wildlife damage are at the wrong time. Most of this damage occurs during the April-June time frame, and they are closed at the end of March in this area. The Master Hunter special and Hunter Season and December season in this area (GMU 127) are more than capable of addressing the problem of damage to agricultural crops in this GMU (and probably the other affected GMU’s as well), but the dates need to be revised, and it probably wouldn’t hurt to let a few more permits out either. This area needs to have an elk management plan.

The wolf plan has angler a lot of hunters. It seems as though we have to bring back the razor clam numbers and participation. I must admit the wolf plan was a mistake and it’s time to let a few more wolves do their thing. Please see the responses to comments under the predator-prey section of this plan.

Western Washington needs to have more control hunts and less general hunts since our populations are depressed as due to the number of captive bulls and bucks is reducing at an alarming rate. This leads to unhealthy animals that are interbred and weak. The herd numbers in elk and deer in the Willapa Hills Unit is becoming smaller yearly at an alarming rate. A once strong fifty numbered herd is now reduced to six with WDFW unmanaging hunts. Seasons are too lengthy and cows and does are hunted during the months when they carry young. This also adds to the reduced population since the months they are carrying babies they are hunted. There needs to be a change and eliminate all late seasons in Pacific County. There is over 6,000 acres of State Park land that is available in Pacific County. As of now, we use less than 5% for public use and yet we are taxed for this land. Throughout the state of WA, there are thousands of acres of State Park land that we utilize and should be allowed to use for public hunting. Waterfowl, and Upland Game Hunting. The only individuals utilizing this land is Hikers and Campers.

With climate change and perhaps changes in diseases and vegetation and water, concentrate on not losing animals (and plants) in the process.

General hunting opportunity is one of the highest values for Washington hunters. Whether caused by climate change or other factors, habitat and disease management are key considerations addressed in the plan.

Wolf target numbers are way to high. WA is not ID, WY or MT! General hunting opportunity is one of the highest values for Washington hunters. Whether caused by climate change or other factors, habitat and disease management are key considerations addressed in the plan.

Youth/young adult firearms education - not sure how to say what I am thinking. There are a lot of youth that have limited exposure to firearms. Hard to have a program to teach them to shoot if mom & dad do not approve. So, all they see is the gang banger shoot up stuff on TV. But, when they turn 18 or 19, provide opportunities for young adults to have some basic education on safety and shoot a few rounds to see what it is like. That may broaden your hunter base.

You might look at the fishiest side of the house and model your hunting plan after what ever they did to bring back the razor clam seasons and participation. Thank You for giving me this opportunity.

Youth hunting opportunities - to me, there is room for improvement. WDFW does respect the right of private landowners to control access on their property but strategies have been included in the plan to try to address the issues related to landlocked public lands.

Allow a continuous archery season. Some states have an archery season for deer that starts in mid September and ends in December.

Wolf with each course. Give them an equal shot at the table. Don’t come with your issues already set in stone. Each county is unique and you need to take that advice. This is a big state with many diverse climates and needs. You need this input much more than your blanket way of doing your business.

You might look at the fishiest side of the house and model your hunting plan after what ever they did to bring back the razor clam seasons and participation. Thank You for giving me this opportunity.

Young adults are a key group where we feel hunter recruitment efforts might be most effective. Thank you for your perspective.

Allow a continuous archery season. Some states have an archery season for deer that starts in mid September and ends in December.

Reward high quality hound hunters for truly capturing and eliminating wolves. WDFW does respect the right of private landowners to control access on their property but strategies have been included in the plan to try to address the issues related to landlocked public lands.

Keep up the good work!

Keep up the good work!

I would encourage the WDFW to seriously confront timber companies regarding the pay for play initiatives that are coming into play. When our forefathers left England, killing game was only done by the land barons and nobility. In America, game was available to all men (and women) rich and poor. It won’t take long before the public realizes that hunting is a rich man’s sport and will not pursue it. By then, our hunter education classes will be nearly empty.

Keep up the good work!

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Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Thank you for your perspective. We do recognize that farm raised birds are not as wary as wild birds but some hunters do value the additional opportunity this program provides.

We attempt to utilize the best scientific methods available to manage game populations and strike a balance between meeting recreational expectations of the public.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Thank you for your perspective. WDFW has a very active effort to evaluate the effects of climate change and protecting wildlife populations is our primary goal. WDFW’s mandate also directs us to support recreational hunting for other benefits.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

This recommendation and others can be evaluated during the 2015-2017 three-year hunting season package development.

Thank you for your support for our conflict objectives.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

Acknowledged.

Acknowledged.

Thank you for your comment.

Thank you for your comment.

Thank you for your comment.

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<table>
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<tr>
<th>Page</th>
<th>Text</th>
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<tbody>
<tr>
<td>1</td>
<td>am now 84). I know that my ability hunt like I use to - I am not ready to sell my guns yet - I would like to see more things done that would make opportunities super senior citizen to see the roads to hunt a little easier. Like extended seasons. Like archery &amp; muzzleloader get. Or more doe permits.</td>
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<tr>
<td></td>
<td>The current regulations so not allow hunting of bear or turkeys. BUI. They do not make it unlawful to bait deer, moose and etc. PLEASE make it unlawful to bait any game animal and only allow for 11 predators. One outfitter alone in Okanogan county bought over 100 bins of apples last year to maintain his bait piles; this is not hunting, many vehicles you see in the woods have apple bins full of apples in the back. I have even found hunters (I use the term loosely) using back pack to transport apples into areas not accessible by road. The time has come to stop this. The mature buck herd in Okanogan county has suffered to long with this practice.</td>
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<td><strong>The Fact that the 2015-2021 Game Management Plan Objectives list 137, shows that there are things that need to be done. But why is it that the Apex Predators have some of the fewest objectives? Out of 137 objectives there at 7 for Cougar, 5 for Bear and ONLY 1 for WOLFS? I total only 11 objectives out of 137. If anything the Wolf should have the most objectives due to the history of what these animals can do to the ecosystem. Don't get me wrong I like the wolf, but in a managed limit. Everyone is too scared of special interest groups to tackle the subject. Well I am a Special interest group, call a Hunter and wildlife conservationists…. When does my voice get heard?</strong></td>
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<td>There isn't an Objective 138 but worth mentioning in my mind would be an objective around better working relationships with specialized hunters that are particularly helpful controlling animal conflicts/damage (squirres, baiz, hound). Yes there have been some problems in the past but now that we (public initiative &amp; WDFW folks) have run a lot of these folks out of the state, isn't it about time for more cooperative/trusting relationships? These folks are critical to those of us trying to manage hotspots while providing critical habitat, and folks I hear are equally important to WDFW on other Wildlife Conflict issues. <strong>Removal or fur dealers of these folks by anyone isn't in any of our best interest.</strong></td>
</tr>
<tr>
<td></td>
<td>We cannot allow private livestock on our land anymore it is the cause of great polarisation of the people.</td>
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<td><strong>We need to move to Multi season options as a purchase not a raffle.</strong></td>
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<td></td>
<td><strong>What are you doing to prevent poaching? Shouldn't you have strict guidelines in place that will maximize catching poachers and prosecuting them to the fullest extent of the law?</strong></td>
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<td><strong>You should consider making a cougar a furbearing animal and allowing trapping as a harvest method. There are a couple of real pluses to this. Some areas never reach their harvest targets. That should be opened to trapping. Hound hunters are called in for problems cougars. At times this can be a problem. Traps could be a valuable tool when dogs are problematic. Cage traps set for cougars would be very selective as undesirable cougars such as kits or lactating females could be released.</strong></td>
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<td>All lightly sought special permits should be limited to applying for one hunt. When applying for quality deer and elk, moose, mountain sheep and mountain goat permits the applicant should not have a second choice there are too many applicants for these permits, allowing a second, third or even a fourth choice creates an unfair drawing for all applicants. When applying for any other special permit, the only choice that should be considered is the 1st choice, any additional choices should only be granted for undersubscribed hunts.</td>
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<td><strong>Allow muzzleloader tags holders more GMU areas (520 Winston) in the early season, and allow exceptions on muzzleloaders.</strong></td>
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<td>Apex predators are essential for ecosystem health and should not be managed. Good comment for those areas where the harvest objective is not being met and conflicts are evident. Your idea will be shared with others implementing the strategies identified in this plan.</td>
</tr>
<tr>
<td></td>
<td><strong>CTIES tagging of Otter and Bobcats should be easier then needing to go to a regional office during hunting hours. Why not authorize for dealers to CTIES these animals and collect the information at point of sale. It would be a convenience for trappers and it would lighten the load of WDFW biologists.</strong></td>
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<td>I was a muzzleloader hunter until the game department took GMU 500(Wallapa Hll) away and gave it to the archery group, so now I am a modern firearm hunter. Each of the last three 3 year season setting plans there has been 1 day added to the modern rifle season. If it's to be a total of 9 days, 2 full weekends and a full week in between. Then 9 years ago you added 1 day, 6 years ago you added another day, and 3 years ago you added another day. I think 9 days is enough, currently in some GMUs, like GMU 681(Bear River) the archery guys get a total of 33 days so hunt(combining the early and late season) either antlerless or 3pt, nor is there any antlerless permits for the modern firearm hunter.</td>
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<td></td>
<td><strong>I would like a deadline for deer and elk tag purchases. Just like Oregon does, make it so people cannot purchase a tag after the season has begun. Lots of people will kill a deer or elk, and then go to the store and buy a tag for another family member to use on that animal. Then they continue hunting with their tag. I see no reason that we can't have a deadline for tag purchases.</strong></td>
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<td><strong>Make rut hunts (last week of September) that are offered for modern firearm available to all user groups to draw.</strong></td>
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<td><strong>Monitor the cost of resident hunting. A father and son should not have to spend $508 plus dollars a year to hunt and fish multiple species in Washington state.</strong></td>
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<td><strong>Objective: Ban lead shot - the shot just keeps on killing.</strong></td>
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<td></td>
<td><strong>WDFW should be funded by ecotourism, not hunting licenses. Studies have proven that far more revenue is generated by non-consumptive enjoyment of wildlife viewing than by hunting.</strong></td>
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<td><strong>Absolutely no special permits on any property that has a fee access (fee access would also include trophies). This is a way to get the land owner to buy a permit and help pay for the hunting access and property.</strong></td>
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<td></td>
<td><strong>Coyote Derbys must be strictly hunted. Coyotes are an integral part of our ecosystem, and they keep in check rodents and other pest species that are detrimental to crops and livestock.</strong></td>
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<tr>
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<td><strong>Hundreds of empty shotgun shells are discarded each season along the dikes of wetland management systems in Skagit County. These plastic shells wash out into the Sound with each rainfall, endangering wildlife and littering our waters.</strong></td>
</tr>
</tbody>
</table>
Mandate commercial timber companies. No limits on their access permits. If company does not allow restricted hunting opportunities, they should get no help from the state, and land should be determined NO HUNTING.

Move early season archery to the second and third week in September. This could help with the possible conflict with Labor Day campers and hunters as well with the fire danger on public and private lands.

None

Objective: Use correct terms. Fruits, vegetables, and grains are "harvested:" Animals are "killed".

Objective: Stop the bloody war on wildlife.

We need a WAC making it clear that furbearers can be used as bait and are not considered edible for the purposes of the furbear laws.

Consider the actions of wildlife agents, such as videos posted of tethered wolves in leg traps, "kill" decals on helicopters, and hazing of wildlife is abhorrent to much of the public and will not foster an interest in hunting as recreation.

Discontinue the practice of granting extended seasons to land owners that charge fees for hunting access. Buckrun is given a 90 day season when the surrounding area is only 9 days. They may charge what they want for access, as a land owner, that is their privilege. Being granted a 90-day season to bring in hundreds of thousands of dollars when the deer belong to the citizens is ridiculous.

For the commission to grant these special privileges is a slap in the face to the majority of the hunters in Washington St.

None

Objective: Protect endangered species and other wildlife.

I should much regret to see grow up in this country a system of large private game preserves kept for the enjoyment of the very rich. One of the chief attractions of the life of the wilderness is its rugged and stalwart democracy; there every man stands for what he actually is and can show himself to be.” — Theodore Roosevelt, 1903.

My concern is with hunting of wolves which are not a game, but an endangered species of animal. I saw only one mention of working on control of a species only after their numbers have achieved a pre-set level. Wolves do not seem to be accounted for by the 2015-2021 Game Management Plan.

Will there be a plan for the protection and management of wolves in Washington state? Thank you.

We need a WAC making it clear that furbearers can be used as bait and are not considered edible for the purposes of the wastage laws.

None

Objective: Stop the bloody war on wildlife.

Minimum Caliber Reduction - Going from a .243 with 80 to 100 grain bullets to a .223 with 40 to 60 grain is unethical from an energy standpoint, especially for deer and elk sized game. 80 grain is marginal at best. Recoil should not be an issue, as .243 has very little. If a person can hold up the rifle they can handle the recoil. Remember the majority of the AR-15 Military style semi autos are .223 with large capacity magazines. The public perception of this would not be good.

Master Hunter Programs should go back too its original intent, which to harvest problem wildlife. Other special hunt opportunities should be available to all.

The price of hunting and fishing has become a problem for myself and others. I'm retired and on a fixed income. I managed to buy my license and tags this year, but next year I'm not so sure I'll be able to afford it. I live in Stevens County. Top wage here is about $15.00 an hour. A Family with two or three kids can't afford it, so will not be able to pass the enjoyment of our American Traditions of hunting and fishing anymore. I would like to see a family hunting license and tags and fishing license for $100 that covers the whole family until the kids are 16. You need to think about those of us who love the sport and the great outdoors, but you are pricing us out of it.

There used to be a 65 or older rate, why was it dropped?

I don't think it's right that you have to buy a discover pass after you buy a hunting and fishing license.

Save what we have remaining on this Planet from our Seeds, Insects, Birds, Bears, Bison and all Seven Billion of us depending and feeding on them. Money is perhaps more important for a happy end?

LET'S STICK TO THE PLAN. WE NEED WOLF RECOVERY NOT TROPHY HUNTER RECOVERY. LIKE MOST CITIZENS I DON'T HUNT AND HUNTING AND KILLING SOMETHING NOT EDIBLE HAS ALWAYS BEEN NOT ON MY HUNTING AGENDA. IT MAKES ME SICK TO THINK ALL THE VALUE SOME PEOPLE PLACE ON WILDLIFE IS MONEY AND SELF RIGHTEOUS GREED. THERE'S NO PRACTICAL VALUE IN DECIMATING WILDLIFE FOR EITHER ONE. WHENEVER SOME ANIMAL GETS CAUGHT IN A FROZEN LAKE, FALLS INTO A HOLE IN THE GROUND, UP IN A TREE, ON A TELEPHONE POLE, FLOATING DOWN A RAGING RIVER ON A LOG, CAUGHT IN A BURNING BUILDING, ETC. ETC. EVERYONE WANTS TO GET INVOLVED AND EVEN CALL OUT THE MILITARY TO SAVE THAT ANIMAL, THEN THE WILDLIFE DEPARTMENT, HUNTING CLUBS, SO CALLED SPORTSMEN ETC. ETC. WANT TO RANDOMLY GO OUT AND START SHOOTING EVERYTHING IN SIGHT. WHAT THE HELL IS WRONG WITH ALL THESE ANIMAL PEDOPHILES AND MONEY GRUBBING INHUMANS. START PLACING VALUE ON ANIMALS INSTEAD OF WANTING TO SHOOT DOWN ALL THE SPECIES INHABITING PLANET EARTH. ALWAYS REMEMBER GOD CREATED ANIMALS BEFORE MANKIND AND IT WAS MANKIND THAT SINNED AGAINST GOD NOT ANIMALS. MANKIND IS JUST ANOTHER ANIMAL AND STILL SINNING, NOT IN ANY WAY GODS. SO START BY STICKING TO THE PLAN AND LIVE AND LET LIVE.

Predator/Prey Interactions

Predator populations (especially black bears and cougars) have returned to healthy levels in Washington over the past 30 to 40 years. While the public generally views their return positively from an ecological perspective, managing carnivores in the smallest state in the west with the second highest human population presents many challenges. One of those challenges is addressing potential predator effects on prey species.

We agree. This document should be about managing predator populations at a level that ensures their viability but in balance with prey across the landscape in Washington thereby, providing maximum hunter opportunity. It will be even more difficult in the future for the WDFW to address challenges between predators and prey interactions with the new predator (wolf) on the landscape.

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281
WDFW must effectively manage wildlife to meet population objectives in balance with citizen tolerance and support. The management goals for black bear, cougar, and bobcat include managing statewide predator populations for healthy, long-term viable population levels and improving understanding of predator-prey relationships and the potential impacts of predators on ungulate populations.

The predator/prey interactions component of this document is a highly contentious section that has not been vetted by the public or the Commission at the time of release.

**Issue Statement**

The WDFW has developed management guidelines to provide direction for when black bear, cougar, or coyote management actions would be recommended as a means to achieve ungulate population objectives using the best appropriate science. WDFW recognizes that predator management is a viable population management tool to achieve prey population objectives (hereafter referred to as predator-prey management). The WDFW also recognizes that socio-political concerns may drive wildlife management decisions and that societal values are often polarized regarding predator management for the purpose of achieving prey population objectives.

**Recommendation**

We are providing direction on coyote management actions when coyotes are listed as w/classified which means that they are not protected? Are we now starting to establish predator-prey relationships for the management of coyote populations? The conversation should be about management of predator populations at a level that ensures their viability but is in balance with prey across the landscape in Washington. The term socio-political concerns should be standardized, clearly opens the door for special interests that don’t recognize or accept the role of hunters in society and the benefits they provide for management.

**ACTION CONSIDERATION**

Predator-prey management actions will be consistent with management objectives for predators, prey, habitat, and societal parameters.

**Recommendation**

We believe that too much focus in this document is on predator control which is likely not to work or provide only short-term benefits particularly if carried out in small areas such as individual GMUs. If the Department decides to take an action, management will be directed at either individual predators or populations and would be primarily managed through: (page 20)

a. Recreational hunting seasons.

b. Predator removal via: 1. Specific actions to remove individuals or reduce populations of predators, using licensed hunters/trappers. (page 20)

Using cougars as an example, we believe the WDFW needs to increase boot allocation in GMUs with problem cats.

See A above. We also believe this type of control will help to ensure that cougars occupy suitable habitat, not areas where livestock is wintered or rural/residential areas. This approach will help maintain support for cougar management by reducing the number of incidents and cougars that have to be killed by professional contractors.

2. Professional contractors such as USDA Wildlife Services (monitored and supervised by WDFW) (page 21).

We believe that the hunter needs to be used as the tool to balance predator-prey relationships wherever possible thereby reducing problematic incidents. USDA and WDFW contractors can be used as tools to help manage problem animals, but USDA Wildlife Services does not need to be supervised by the WDFW.

c. Habitat manipulation (page 21).

The use of habitat manipulation is misguided. Without a doubt ungulate population objectives should be based on the intrinsic limits of the habitat. However, as predatory pressure plays a role in the decline of a population then predatory pressure should be reduced to improve ungulate numbers to levels that maximize productivity and hunter opportunity. We are also concerned that the reference to habitat manipulation is “Trophic Cascades” which is bureaucratic overreach on well managed lands. Trophic Cascades should only occur in management areas where wildlife is not managed using the tool of hunters. A primary example is Yellowstone Park.

**ASSUMPTIONS**

Certain assumptions apply when considering predator-prey management:

a. The scientific information points to predators having a significant effect on ungulate population levels that ultimately impacts attainment of a population management objective. We agree with this statement; this is the cornerstone to predator-prey management.

b. The term "management objective" means a population or management objective identified in a planning document or commonly accepted and used by WDFW for management of that species. The basis for population objectives (outside of a listing status) are assumed to include viable and productive population levels and are often developed in consideration of: current population estimates; harvest history; current harvest levels; currently occupied summer and winter ranges; condition of available forage and other habitat; land use practices; volume and distribution of property damage complaints; landowner tolerance; and public satisfaction (page 21). We are now including the new terms "viable & productive population levels" which are not defined. Again what happened to the Legislative mandate? When reviewing the WDFW incident reports from June 2013-May 2014 the WDFW killed 41 problem cougars, relocated 7, and issued 25 depredation permits with unknown if dispatched. The WDFW is clearly single species managing for cougars to the detriment of prey species and rural residents and at a great expense. During this time period the WDFW employees confirmed 157 dead livestock and 16 dead pets. This is clear evidence that the WDFW’s current management objective for cougars was not developed using current population levels, current harvest levels, property damage complaints and landowner tolerance and as a result it does not work?

We seriously question how this definition of “management objectives” will allow the management of wolves at a population level in line with the Legislative Mandate and the Commission position statement on wolves.

c. Implementation can apply across a continuum of predator management strategies, ranging from removal of individual or small numbers of animals to population level management across a broad spectrum of geographic scales (from site management to a larger landscape or region). Individual and local population management actions will be addressed as a priority, with population level actions considered only when wide scale actions are deemed necessary to sustain prey populations (page 21).

We believe that sound management should never lead to a point where the WDFW is only "sustaining prey populations". Focus on small scale actions will likely be unproductive. The focus of the predator prey interaction...
section states that predator population levels have returned to healthy levels across Washington. A natural balance between predator and prey results in stabilization of prey populations which may be below management objectives and serve to not meet human needs for recreational hunting. Broad scale reductions in predator numbers that ensure predator perpetuity but maximize human use is what is warranted.

The commission shall attempt to maximize the public recreational hunting opportunities of all citizens, including senior, disabled, and minor citizens (see Title 77 Revised Code of Washington).

**Strategies:**

**Implementation of Predator Management Actions**

When WDFW considers predator management actions, the following information would be documented:

a) Define the problem and rationale for a proposed action as determined by WDFW and external predator-prey ecology experts.

1. Articulate the biological status of the predator and prey populations and the impact of predation on the prey population.

2. Articulate the socio-political aspects regarding the predator and prey populations in question.

3. Assess the evidence that wildlife management actions or species population objectives are not being met due to predation.

4. Determine the independence of other ecological affects other than predation (e.g., habitat, disease, etc.) on prey populations.

5. Determine whether population or individual level management actions are appropriate.

b) Risk assessment —Assess the effect of proposed management actions on: 1. Predator populations

2. Prey populations i. Level of acceptable predation.

3. Other species (e.g., trophic cascades)

4. Habitat

5. Recreational opportunity

6. Landowners

7. Stakeholders who might be for or against actions.

c) Proposed Action:

1. Define geographical boundaries.

2. Identify which predator species are affected.

3. Identify prey or other species that may be affected by the proposed action.

4. Describe the methods to be used (e.g., predator removal, hunting season changes, habitat manipulations).

5. Project the expected outcome/objective  
   i. Include scientific information that addresses the expected effectiveness/success of predator control actions to understand the monetary and social risks.
   ii. Likelihood of success and how success is measured.

6. Develop a monitoring plan to evaluate effectiveness prior to and following the control actions.

7. Define a timeline for evaluating action.

d) Public Review: 1. Stakeholder discussions

2. SEPA/NEPA review when appropriate

3. Commission action when appropriate

We believe that the approach outlined in the implementation of predator management is not attainable and is designed to leave impacted stakeholders with an acceptable remedy. We believe the strategies outlined in a, b, and c create a standard that is too high to achieve thereby not allowing for any wolf, cougar, and bear predator management. We are strongly opposed to these strategies as a whole. If public opinion is to be used, 76% of those surveyed by the WDFW support reducing predator populations to increase deer and elk herds. See legislative mandates.

Overall comment: It appears that the approach to predator-prey management outlined in the GMP is incredibly cumbersome and will not lead to fulfilling the legislative mandate or the Commission's position statement. Given the WDFW's lack of base-line data on many ungulate populations, and the WDFW’s requirement to implement substantial habitat improvements, we believe it is unlikely that predator management actions will be taken as a result of this proposal. Given the complexity of the proposed strategies and the near impossibility of the WDFW to measure and accurately quantify their actions, we believe this proposal leaves the department ripe for litigation from those that oppose predator management.

"The Commission recognizes the importance of the hunting tradition. The North American Model of Wildlife Conservation founded in the 1800s has provided a durable approach to securing adequate funding for wildlife management and conservation. Under this model, hunting license sales provide revenues for management and hunters supply a low cost and efficient means to manage wildlife populations. The Commission is concerned with potential future impacts of wolves on ungulate populations (deer, elk and moose), resulting impacts on hunting opportunity, and the continued viability of the North American Model in our state."

"Actions to maintain or improve ungulate populations to prevent a significant decline must also be a high priority."

**COMMISSION POSITION STATEMENT: Wolves in Washington April/13, 2012**

It is time for the Commission to direct the WDFW to start over and draft a predator/prey document that adheres to its legislative mandates and Commission position statement on wolves.
Livestock production, similar to farming, is an essential component of Washington's economy. In addition to minimizing loss and injury of livestock and maintaining landowner tolerance of carnivore species, there is increased concern for public safety. Protecting people from dangerous wildlife while maintaining sustainable wildlife populations is a primary objective of the Department. The Department utilizes both non-lethal and lethal techniques to provide landowners with assistance for minimizing livestock loss or injury caused by carnivores. Washington residents historically have supported the use of hunting to address human safety and prevent loss of livestock (Washington Department of Fish and Wildlife 2008, Dietsch et al. 2011 and Responsive Management 2014).

We agree. Thank you for your support.

Predation

Background

Black bears, cougars, coyotes, and wolves all prey on elk calves and/or adult elk. Predator management by WDFW will be consistent with the predator/prey guidelines explained previously in the section pertaining to Objective 3. (page 56)

We totally disagree with the predator prey guidelines see our comment on objective 3 (see pages 23-45 of this document).

If the WDFW determines that wolf predation is a primary limiting factor for an "at-risk" ungulate population, and the wolf population in that wolf recovery region has at least 4 successful breeding pairs, the WDFW can consider reducing wolf abundance in localized areas occupied by the ungulate population before state delisting of wolves occurs. (page 56)

This is a smoke screen, the WDFW will never determine that wolf predation is a primary limiting factor for an "at-risk" population. And if they made such a determination it would open up for a lawsuit by the anti-hunting pro-wolf communities. (see strategies page 21)

Bighorn Sheep and Mountain Goats

We recommend that both sections include a predation management section similar to that found in the elk and deer sections. Ignoring predation does not make sense as many sheep and goat populations are small and fragmented as such they are particularly vulnerable from impacts from predators.

Thank you for your comment. Predation is addressed within other objectives and strategies in the bighorn sheep chapter.

Commission and Department Authorities

As mandated by the Washington State Legislature (RCW 77.04.012), "...the department shall preserve, protect, perpetuate, and manage the wildlife..." and "The commission shall attempt to maximize the public recreational...hunting opportunities of all citizens, including juvenile, disabled, and senior citizens..." It is this mandate that sets the overall policy and direction for managing hunted wildlife. Hunters and hunting will continue to play a significant role in the conservation and management of Washington's wildlife.

The scenario you described might be the right tact depending on the circumstances. This objective and strategies would not rule that out.

Livestock production, similar to farming, is an essential component of Washington's economy. In addition to minimizing loss and injury of livestock and maintaining landowner tolerance of carnivore species there is increased concern for public safety. Protecting people from dangerous wildlife while maintaining sustainable wildlife populations is a primary objective of the Department. The Department utilizes both non-lethal and lethal techniques to provide landowners with assistance for minimizing livestock loss or injury caused by carnivores. Washington residents historically have supported the use of hunting to address human safety and prevent loss of livestock (Washington Department of Fish and Wildlife 2008, Dietsch et al. 2011 and Responsive Management 2014).

We agree.

Thank you for your support.
conducting predator manipulations. So requiring habitat enhancements and waiting for the results seems like a way to end up not recovering. The scale and type of habitat enhancements also dictates the potential response, so improvements may take many years to yield benefits, and if the factor is predation, then the impact on cougars. But the impact is relative to the spatial and temporal scale, and despite different impacts relative to the experimental scale, the long-term result may be healthier for all species. A conservative predator harvest strategy to not negatively affect predators may lead to longer-term and larger-scale significant negative impacts to both prey and predator. Asking outside reviewers to define "significant" absolutes WDFW of responsibility when its own staff should have the skills necessary to make science-based decisions. The process opens up the possibility for biasing the outcome by choosing which reviewers to use. It is hard to know what you would like to see changed in this sentence of the plan. The idea is to ensure that hunted species management strategies don’t impact non-hunted species sustainability. The scenario you described would be addressed by the predator-prey section of the plan.

### Washington State Wildlife Watching vs Hunting

<table>
<thead>
<tr>
<th>Wildlife Watching</th>
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<tr>
<td>Participants</td>
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<tr>
<td>Expenditures</td>
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<td>Total Economic Impact</td>
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<td>Jobs</td>
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<td>Federal Tax Revenues</td>
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</tbody>
</table>

While the Dept notes that hunters spend $64 per day, which shows the economic benefit of having wildlife to hunt, the Dept fails to mention the $53 per day that wildlife watchers spend. The Dept must look to the future of an aging population that tends to watch wildlife; and the continued slow decline of consumptive use. Also, with wildlife (excluding fish) contributing about $488 Million to state and local governments, the Dept should be making the business case to the Legislature to properly fund management of the wildlife public trust.

### Strategies for hunted wildlife will not have significant negative impacts on the sustainability of other wildlife or their habitats

This statement is general and poorly defined. What are "significant negative impacts" and at what spatial and temporal scale is sustainability measured? A locally depressed elk herd is in adequate habitat that is far below objective resulting from high cougar numbers will need to be released from predation in order to recover. But that may involve more cougars killed, and the higher cat harvest could be interpreted by some people as having a negative impact on cougars. But the impact is relative to the spatial and temporal scales, and despite a short-term local impact, the long-term result may be healthier for all species. A conservative predator harvest strategy to not negatively affect predators may lead to longer-term and larger-scale significant negative impacts to both prey and predator. Asking outside reviewers to define "significant" absolutes WDFW of responsibility when its own staff should have the skills necessary to make science-based decisions. The process opens up the possibility for biasing the outcome by choosing which reviewers to use.

### Predator and prey populations are managed to ensure the long-term perpetuation of each species while attaining individual population objectives

The problem is with how to set objectives for prey and predator. It is widely cited that ungulate objectives be partly habitat-based, but predator objectives are not often prey-based, see comment on cougar below. Sustainable objectives for both can only be achieved by making sure one trophic level does not affect the lower trophic level. Ungulate objectives would never be set to "stable" when it is known they exceed the habitat capacity, why should carnivore objectives be set to "stable" without confirming that their food supply is healthy and meets hunting objectives?

### Management of predators to benefit prey populations will be considered when there is evidence that predation is a significant factor inhibiting the ability of a prey population to attain population management objectives

We concur that population dynamics are affected by many, many factors and managing all of them can be challenging. Providing evidence that any one of them is "significant" is challenging, costly, and requires long-term monitoring. Many ungulate herds are inadequately surveyed to determine population size and detect changes in numbers. Waiting to see if habitat improvements improve an elk herd may be costly because the results of habitat improvements may take many years to yield benefits, and if the factor is predation, then the recovery has been prolonged and the herd may decline further requiring even more years to recover. The scale and type of habitat enhancements also dictates the potential response, so the enhancements must be significantly large, and of high quality, which is rarely the case. So requiring habitat enhancements and waiting for the results seems like a way to end up not conducting predator manipulations.

### Action Consideration item c. Habitat manipulation

It is highly unlikely that predator management for will be accomplished by manipulating habitat, especially cougar. Predators will go where the prey are, and will kill what they need to survive.

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As shown on p 13, hunters are a decreasing part of WA’s population, WDFW must focus resources on growing financial participation with all holders of the wildlife trust. The National Survey showed that Wildlife Watchers spent $3.2 Billion and had 2.2 Million participants. The latter is where the Department needs to focus growth and funding. The Department needs to work with NGOs and the Legislature for a new funding model, instead of hoping for a resurgence of consumptive use. The following data is from the 2011 National Survey:

**Federal Tax Revenues**

<table>
<thead>
<tr>
<th></th>
<th>Hunting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wildlife Watching</td>
<td>$ 369,565,921</td>
</tr>
<tr>
<td>Hunting</td>
<td>$ 39,653,073</td>
</tr>
</tbody>
</table>

**State and Local Taxes**

<table>
<thead>
<tr>
<th></th>
<th>Hunting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wildlife Watching</td>
<td>$ 448,488,469</td>
</tr>
<tr>
<td>Hunting</td>
<td>$ 39,653,073</td>
</tr>
</tbody>
</table>

**Salaries and Wages**

<table>
<thead>
<tr>
<th></th>
<th>Hunting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wildlife Watching</td>
<td>$ 2,132,888,979</td>
</tr>
<tr>
<td>Hunting</td>
<td>$ 211,083,317</td>
</tr>
</tbody>
</table>

**Expenditures**

<table>
<thead>
<tr>
<th></th>
<th>Hunting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wildlife Watching</td>
<td>$ 1,173,373,000</td>
</tr>
<tr>
<td>Hunting</td>
<td>$ 369,565,921</td>
</tr>
</tbody>
</table>

We agree that other entities including wildlife watchers need to help with the funding for wildlife conservation. Hunting license dollars and excise taxes on arms and ammunition still provide far more than mechanisms developed to fund non-hunted species.
Define the problem and rationale for a proposed action as determined by WDFW and external predator-prey ecology experts.

1. Articulate the biological status of the predator and prey populations and the impact of predation on the prey population.

Are all predator-prey actions going to be run through external peer review? Again, the potential for biasing the results are huge, especially if the review includes persons who have studied predators and not prey, and have assessed predator-prey relationships in a landscape where animal numbers and density are very different from the problem area. What might happen over 2,000 sq. miles with a herd of 10,000 could be very different than a herd of 200 in a 150 square mile area.

From our perspective it appears that the WDFW has proposed an extraordinarily difficult approach to predator-prey management that may never be implemented. Data requirements may be beyond what is collected, and changes may be numerically smaller but biologically significant, than the resolution needed to detect a change. There does not appear to be an option to conduct trial manipulations, or to learn by adaptive management, without undergoing the very detailed process and public scrutiny that will likely derail any attempt at managing predators.

We recommend that there be a strategy that includes an adaptive approach on a small scale that can be implemented without the need for the cumbersome and rigorous strategies proposed on pages 21-22. That was the intent of this strategy. Because of the contentious nature of taking lethal actions on predators, it was felt that this was a prudent step. Selection of peer reviewers will be important and should be composed of those who have considerable experience.

As written, the agency would only need to review what is currently available. The current strategy language would allow for a pilot or adaptive approach to be implemented.

Wildlife Conflict

Highway mortality kills wildlife, injures people, and is expensive. Highway mortality is not discussed in this section or anywhere in the GMP. We recommend that there be an objective to reduce wildlife-vehicle accidents with associated strategies on how to achieve the reduction. These strategies should include reduced speed limits, increased site distance, improved signage, and improved public awareness in areas most likely to see wildlife-vehicle collisions.

The Washington Department of Transportation (WSDOT) is the lead agency that addresses reducing risk of vehicle collisions with wildlife. However, to the extent that is possible, WDFW works collaboratively with WSDOT to assist them in reducing the frequency of vehicle collisions with wildlife. WSDOT, WDFW, and other stakeholders are working on assessing habitat connectivity statewide to identify areas where wildlife species frequently cross or migrate across roadways. WSDOT utilizes many of the strategies you’ve identified as well as other techniques such as overpasses and underpasses, fencing, and combinations of the two.
Appendix C - Public Comments and Agency Responses
(Comment Period October 17 – November 21, 2014)

Note: The comments listed in this Appendix refer to the Objectives as they were written in the Draft Supplemental Environmental Impact Statement. Some of the Objectives have been re-written due to changes made to the plan as a result of these comments. In addition, several comments that were substantially the same were combined and the number in parentheses represents the number of similar comments. If an objective is not listed, no comments were received during this comment period.

<table>
<thead>
<tr>
<th>PUBLIC COMMENT</th>
<th>WDFW RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objective 1: Game Division Section Managers, Regional Wildlife Program Managers, District Wildlife Biologists, and field biologists should each attend at least one professional seminar/workshop each year.</strong></td>
<td></td>
</tr>
<tr>
<td>Thank you for the opportunity to provide comments on revised draft SEIS. Because much of the document is on species-specific management which does not directly affect Seattle City Light (SCL), SCL reviewed comments and included on the sections that pertain to WDFW’s coordination with landowners.</td>
<td></td>
</tr>
<tr>
<td>We appreciate the time you took to provide your thoughts. Thank you for your support of the statement, we have forwarded your letter to our local office in Mill Creek and asked them to contact you directly.</td>
<td></td>
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<tr>
<td><strong>Page 18</strong></td>
<td></td>
</tr>
<tr>
<td>Excerpt -- Issue Statement</td>
<td></td>
</tr>
<tr>
<td>WDFW wildlife managers and biologists have developed goals, objectives, and strategies in this plan to ensure long-term sustainability of all wildlife. The best available science will be the basis for the management of all endemic wildlife populations. Strategies for hunted wildlife will not have significant negative impacts on the sustainability of other wildlife or their habitats. None of the strategies, subsequent hunting season recommendations, or implementation of activities will deviate from these fundamental principles. Science is the foundation of this plan.</td>
<td></td>
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<tr>
<td>Thank you for your support.</td>
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<tr>
<td><strong>Objective 3: Implement the following guidelines for predator-prey management.</strong></td>
<td></td>
</tr>
<tr>
<td><strong>PUBLIC COMMENT</strong></td>
<td></td>
</tr>
<tr>
<td>I would like to see either hunting with dogs for cougar and/or bear be brought back or being able to bait for them. Change an annual fee when you get your license if you choose to use dogs or bait, and the state will collect more revenue and the hunters will help control the high predator populations.</td>
<td></td>
</tr>
<tr>
<td>1. Most importantly, if we are concerned about the deer and elk populations, we should first evaluate the volume of predators. The number of cougars has obviously been on the climb since general tag hound hunting was prohibited, and the cougar population is taking a substantial toll on the deer and elk. Not to mention, the number of livestock and pets that they kill. It is only a matter of time before a child gets attacked or possibly killed. I have heard a number of people “jokingly” say the only way to get through to our voting community on the west side of Washington (the majority vote typically) would be release a handful of cougars and wolves in/around the cities of King County. Speaking of wolves, their number is obviously increasing as well and they are spreading into new areas at a fast rate. All we have to do is look at how the wolves have devastated deer and elk numbers in several regions of Montana and Wyoming (among other areas) to know what our future holds unless we (our Legislature has debated the ban fairly routinely for a number of years, but the ban has been retained.</td>
<td></td>
</tr>
<tr>
<td>The ban on the use of dogs was a citizen initiative and is now a state law. The Legislature has debated the ban fairly routinely for a number of years, but the ban has been retained.</td>
<td></td>
</tr>
<tr>
<td><strong>Predator-Prey Interactions</strong></td>
<td></td>
</tr>
<tr>
<td>Under Guiding Principles, #2, second sentence: why was habitat enhancement removed?</td>
<td></td>
</tr>
<tr>
<td>#6, why did you add the language “when determined necessary by the Department?” Did you need this based on experience? I think the existing language addresses concerns by the public focusing on wolf predator/prey issues.</td>
<td></td>
</tr>
<tr>
<td>We have updated the language in this section as well as the bear and cougar management sections to reflect the concerns about predator impacts to their prey.</td>
<td></td>
</tr>
<tr>
<td>Under Assumptions, Why was “significant” added? How will that be defined?</td>
<td></td>
</tr>
<tr>
<td>All of the changes you describe were to address comments received in the first release of the SEIS. Habitat management was removed because although it can be an effective tool to reduce predation for many species, it is not typically very effective for large carnivores. Also this was just an example of things the agency would consider.</td>
<td></td>
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<tr>
<td>Under Strategies, Implementation of predator/prey actions: Why remove “predator/prey ecology experts”? Again, including the original language addresses concerns that actions based on science.</td>
<td></td>
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<tr>
<td>The department was mainly looking for a little more flexibility in calling in peer reviewers or experts for appropriate actions rather than all actions.</td>
<td></td>
</tr>
<tr>
<td>under (a), 2 and 3: Define assess -- would that include independent scientific review as described above?</td>
<td></td>
</tr>
<tr>
<td>All proposed actions would go through a SEPA (public review) process, so that citizens can challenge the significance of an action or any other part of an assessment of whether an action is warranted.</td>
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</tbody>
</table>

*WDFW RESPONSE*
We suggest that you use actual numbers of wolves, and packs AND add successful breeding pairs by year by recovery region. Portrays a more accurate picture of where we are with wolf recovery in our state.

Note: The Wolf Conservation and Recovery Plan does NOT have a strategy for developing a post-delisting wolf plan. Including it as a strategy under the current Wolf Plan is not accurate. Under strategies under "e" - suggest "Draft an independent plan.....once recovery objectives have been achieved and wolves are reclassified as protected. game animal or unclassified.

Alternative WDFW Members,

My name is __________ I would like to comment on the plan for Washington wolves.

After reviewing your proposed draft on the SEES for 2015-2021 it seems that the plan is premature given that the gray wolf has not fully recovered and with the issues re: both the Wedge pack, the Huckleberry pack as well as the recent poaching of the alpha female in the Teanaway pack it does not appear to me, as a concerned wolf activist that we will have 15 breeding pairs for 3 consecutive years or 18 breeding pairs in 3 recovery zones in Washington state for one year. In your statement you contend that if an "at risk" ungulate population is a result of wolf predation and there are 4 breeding pairs in that Recovery zone you will consider reducing wolf abundance in localized areas occupied by ungulates before wolf recovery is complete even if delisting of wolves has not occurred.

Given the progress of wolf recovery in Washington state and with the issues mentioned above I believe that wolves should be fully protected until complete recovery occurs. If wolf recovery happens by 2021 pigs will be flying. If not, no wolf should be a victim of gun assault. You need to get these horrible issues like the Wedge pack and Huckleberry pack resolved completely before another wolf is assassinated by your department. It is an embarrassment to Washington state, when as a traveling educator in the Southwest, Arizona I am frequently ask how something like the Wedge pack incident could possibly occur. When 75% of tax paying citizens/Washington State residents want wolves in the wild the voting data you should reassess this part of your plan.

Thank you for the opportunity to comment.

Objective 5: Increase the number of hunters who hunt each year rather than every couple of years, and create incentives for those who have stopped hunting to participate once again. Increase the number of hunters participating for the first time in Washington.

PUBLIC COMMENT

The Department’s responses to some comments on Objective 5 are non-responsive, dismissive, and show a lack of understanding of the importance of hunting to the conservation and management of the wildlife species within Washington. In response to these comments, WDFW should provide a more comprehensive and scientifically sound response that addresses the concerns raised by hunters and conservationists.

We apologize if you felt the colloquial phrase was offensive, we did not mean it that way. We agree with you that an alternate funding mechanism is serious and critical to the future of wildlife management in Washington as well as the rest of the US. However, this plan is about hunted species and the significant factors that affect them.

We are confident that hunters will continue to provide the majority of funding through license sales and federal excise taxes on sporting equipment. The level of funding has increased over the past ten years despite a decline in the number of hunters participating annually.

We are confident that hunters will continue to step up during the life of this plan to fund game management and that it is important to encourage their participation in this tradition and outdoor recreation.

This AFWA initiative is very important to WDFW and we will be a strong participant and supporter of its process and recommendations. It is important to remember that its intent is to increase funding mainly for nongame species. What we need is a funding mechanism equal to the current levels achieved from fishing and hunting revenue.

WDFW RESPONSE

Page 70 of the Wolf Conservation and Management Plan includes a statement that after delisting, the Department intends to develop a new plan for managing wolves. The strategy in this Game Management Plan is designed to make sure we take the time to conduct a thorough and deliberate process in developing this independent plan. That way we will have a good understanding by all the stakeholders in what the management options might include.

As stated previously, wolves will continue to be managed under the Wolf Conservation and Management Plan. The only strategy identified in this Game Management Plan is to initiate the development of a wolf management plan to guide wolf management after wolves have met the recovery objectives and are de-listed by the Fish and Wildlife Commission.

We agree that the majority of Washington citizens support wolf recovery, but the percentage has decreased in recent surveys to about 65%. In addition to the level of support however, there is also fairly strong support (~70%) for taking lethal action to stop repeated depredations by wolves on livestock.
Objective 6: During each three-year hunting package, facilitate public debate of regulations for use of electronic equipment and baiting of wildlife for purposes of hunting.

PUBLIC COMMENT

(23 Comments)

To the Washington Fish and Wildlife Commission:

I support the optional use of baiting for deer and elk. Objective 6 in the draft 2015-2021 Game Management Plan is to facilitate debate on this (and electronic equipment, which I’m not commenting on here). To be clear, I oppose any proposed ban on baiting for deer and elk. While this technique may not be for everybody, it’s the only option for others. I’ve seen no evidence of a biological or wildlife management need to ban this practice. Decisions such as these should not be made solely on the basis of the loudest voices or most voices expressing personal preferences or political ideologies. Wildlife management should be based on the best available science. That’s the mandate of the Fish and Wildlife Commission. Your draft game management plan explicitly states this, and also addresses authorizing multiple options and choices for hunters. Other than opinion, no evidence has been submitted that baiting deer and elk is unfair or unethical, or even that it’s more productive and successful. Certainly, there’s no scientific evidence. If there’s concern about public perception, it should be addressed with education rather than restriction.

Anyone who thinks a food pile violates the fair chase ethic because it’s too easy has apparently never tried the technique; it requires hard work, research, and skill. This is a time-honored technique that has its roots in American history, and is heritage in some hunting camps. Ironically, Objective 5 regarding recruitment and retention of hunters urges policies that encourage hunters to participate more frequently and consistently, and to bring those who’ve quit hunting back to the field. In a time of fee access programs by private timber companies on forest lands for which a tax break is given, and dwindling public land access, it seems the better strategy for Objective 5 is to avoid unfounded cuts in opportunity based on personal opinions of the few or the load. Baiting bait for deer and elk is just that: an unfounded cut that will result in fewer hunters in this state.

There have been anecdotal comments about a commercial operation that hits the male deer herd hard in two locations during a late archery season; if that’s the case and if that practice is harming the herd health and density, then manage the misuse of the resource by the people involved rather than making a blanket change, or make that a draw hunt. The commission must set seasons, approve tools and tactics, and determine harvest and recruitment goals on the basis of the need of the specific game populations in a given habitat or range — the science of wildlife management using biological information to guide those decisions. That’s your charge.

From your website:

“The commission shall attempt to maximize the public recreational... hunting opportunities of all citizens, including juvenile, disabled, and senior citizens." It is this mandate that sets the overall policy and direction for managing Wisconsin wildlife.”

If this is part of the department's mandate why are you facilitating debate on something that could lower opportunity for hunters (particularly juvenile, disabled and senior citizens)?

Ethics:

To be clear,... This is not an ethical issue. Aside from hunter safety and the issue of killing animals cleanly, quickly, and humanely, there are very few ethical issues involved in how the practice of hunting is conducted. This is an attempt to regulate the "aesthetics" of hunting based on the personal values of a majority at the expense of a minority. I don't see anywhere in WDFW's mandate where it says you should manage the aesthetics of a hunt based on majority rule at the potential expense of recreational opportunity for hunters.

The reality of hunting and "ethics" is that it's one of the most ethical forms of hunting because it allows the hunter time to take a shot at a known distance which will increase the likelihood of a quick and humane kill.

Unique Opportunity in WA:

Baiting is not allowed in many states and rarely in the western United States. We should preserve this method of hunting because it provides a very unique opportunity for hunters to practice something different. It has been utilized since humans first started hunting. It is actually a self-sustaining system that WDFW should be proud to protect. Hunting whitetail in the big woods/mountains of the NW using bait is an experience you can’t get anywhere else (other than perhaps the extreme NE corner of Oregon). I would argue that it is one of the things that makes hunting in this state great.

Economic Factors:

The banning of baiting would have a negative economic impact on the small towns, feed stores, and farmers. We should not consider restricting something that will be economically damaging to the livelihood of people in these small communities when it is not necessary.

Disease:

Some may argue that baiting spreads disease yet we have no proof that baiting is spreading disease in Washington to the detriment of the herd health. I have a nearly a decades worth of 50K plus photos of trail cam data to support the fact that the majority of animals survive from one season to the next (assuming no bad winter) with no apparent negative impact to health.

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 5-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

The on-line survey which was not a random sample of hunters, showed 63% of hunters in favor of baiting and 37% opposed to baiting for deer and elk, with those hunters preferring some level of restriction on the practice.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting.

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Stavartion:
Another common argument is that the deer will starve to death with full stomachs. Yet again, aside from all the trail cam data I have to prove otherwise…... that fact alone would make any of the above unsupported "scientific" arguments against baiting hypocritical at best and completely invalid at worst.

WDFW Feeding of Wildlife:
In addition to the above arguments it is not lost upon me that WDFW feeds wildlife during the winter (and has for decades) with little to no impact from disease or starvation. That fact alone would make any of the above unsupported “scientific” arguments against baiting hypocritical at best and completely invalid at worst.

The Data:
I am also extremely disappointed that WDFW did not break out all the data on baiting. In your reporting you combined the data that supported any kind of restriction on baiting. One of the choices was to only restrict outfitters but you combined it with the data that supported the ban on baiting. I can’t imagine this manipulation of the data was by accident. This is a serious breach of trust. That being said, it's honestly irrelevant what the results are based on my previous comments above.

Harvest:
WDFW has provided not data suggesting baiting is leading to over harvesting or large scale damage to wildlife. Yet again, we have used this method for decades and the hunting has been great every year with deer numbers generally only dropping off after bad winters.

Baiting Defined:
You should probably also make it clear what you are referring to when you say “bait”. The public needs to know if you are referring to scents also which fits into your current definition of baiting. I don’t think the majority of deer hunters would support restricting the use of scents.

Please!!! Stop searching for reasons to interfere with hunter opportunity and spoil what provides many of us very rewarding memories in the W.A. outdoors.

I would like to submit comments regarding the 2015-2021 rule changes. Specifically, I would like to comment on Objective 6 and the use of baiting in big game hunting.

I am strongly opposed to a complete ban of using bait for big game hunting.

I do not think it violates fair chase rules. From my experience of hunting both baited and nonbaited, it is not a snub junk.

While concern for deer health is of utmost importance, I have not been able to find scientific evidence that clearly shows it is detrimental to herd health.

I do appreciate my fellow hunters objections, but I maintain this is an individual choice.

I hope the state will consider smaller changes such as a ban on state and federal lands, by professional guides, and during certain seasons (such as late gun season).

If a ban is imposed, I would hope clear rules would be developed such as no bait for 10 days prior, a certain distance from a bait pile (such as 100 yards), etc. Will food plots be considered baiting? Can supplemental feed be used during the nonhunting seasons etc? Like in Idaho, a baiting permit may be needed?

Hello, I would like to submit my desire to maintain the optional baiting practices that have always been allowed and have been part of many family traditions. I strongly oppose any ban on baiting deer or elk and would say I hope the commission decides to maintain what is right and allowing hunters to have the right to practice or not practice. It keeps opportunities open for various class of people such as young children, seniors, hand-capped, limited property owners on the westside of the state where other such opportunities would make it impossible to hunt and various other topics.

Thank you.

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

The on-line survey which was not a random sample of hunters, showed 63% of hunters in favor of baiting and 37% opposed to baiting for deer and elk, with those hunters preferring some level of restriction on the practice.

A random survey of hunters, conducted by a professional polling company, showed Deer Hunters were 59% opposed to baiting, 20% were neutral, and 21% supported baiting. The same survey of hunters reported Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting.

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To whom it may concern,

Please do not pass this ruling on baiting without more consideration and research. I use apples to find Blacktails in western Washington and maybe drop 6-12 apples at a time. I am not dumping bits of apples and changing the deer diet. Blacktails are hard to hunt and I use the apples to find out what's in the area. I do not hunt over bait. Many of us do this to give us an idea of want's in our areas. I am not a dumb redneck but instead an educated voter. I have been frustrated by the methods the DFW has used for some time now and am pleading for you to listen to your constituents for a change. That poll you issued whereby you state 59% of hunters oppose baiting was suspect. I have yet to meet a

WDFW,

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many animals that benefit other then the one I might be so lucky to take. To the Dees that are
nurturing their property, to the bucks that growing their antlers, baiting is positive. I'll end with saying
that I will indeed take my hard earned money to another state if baiting is outlawed. Thanks again for your
thoughts.

To whom it may concern,

Baiting should remain legal. But if some sort of scientific evidence if proven that it is detrimental to
male deer and elk herds then certain restrictions on baiting could then be looked at and considered.

Your comment is related to the hunting season setting process which is separate from
the process of developing the Game Management Plan.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the
last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package.
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Commission meeting.

Hello I am writing to ask u to take a serious look at what u are doing or thinking about doing.

Try to think about it from the animals prospective, and their well being.

Another thing to consider is that a good number of resident & non resident hunters that hunt this
wanting to keep there $ at home rather than taking it to Canada to hunt this way.

So please let's do the right thing don't lose yours or our ability to help the wild life this way.

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I am writing to ask you to take a serious look at what u are doing or thinking about doing.

There is high quality food, minerals, and supplements, very carefully placed, in remote areas were a
lot of these deer, elk, moose, would never have a chance to get this valuable life changing resource
that someone wants to take away for a personal reason, I know F&W knows the importance of this
resource, and the expens! Even if they wanted to and had the $ to do it, ish't, they couldn't do as good of a
job or with as much care as the hunter do, the hunters pick these locations for the love of their sport,
pack it in miles from any road on there backs. We can't let a few bad apples run this valuable
resource.

Those same bad apples will always find a way to take advantage of a good situation so let's try to look
at it from the positive tool it is and not try to control some people that use poor judgement.

If this is taken away the two parties that are truly going to be hurt the most is the wild life, and F&W
and lost funding from tags and lic.

Another thing to consider is that is a good number of resident & non resident hunters that hunt this
wanting to keep there $ at home rather than taking it to Canada to hunt this way.

So please let's do the right thing don't lose yours or our ability to help the wild life this way.

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I have however used baiting several times:

1. Getting a handicapped hunter on his first buck, which he then took cleanly with a
single 130 yard rifle shot. He is now an enthusiastic hunter!
2. Getting two new hunters on their first bucks. As a result, both are now enthusiastic hunters! One youngster was a teenager who had trouble coming up with a 3-point minimum mule deer during the regular season on public land (as a student, our nine-
day regular season actually limited him to four days of mule deer hunting every year).Baiting allowed him to see multiple white-tailed bucks and he has now taken several. He remains an enthusiastic hunter and is part of our hunting future.

Sometime I’m going to be too old and beat up to prove the high ridges for mule deer. I would like to
continue my hunting well into the future, and see baiting as a way to prolong my hunting years.

Please, do not initiate a ban on baiting for deer & elk. It is simply one more way of hunting, not
inherently evil, not destructive to the health of the herds.

I started hunting a few years ago, and I have had success with being able to fill my tag with baiting.

There also, has been times I wasn’t successful and haven’t been able to fill my tags, and I was ok with
that because I was able to watch so many animals benefit from the food/protein that’s been put out
there for them. It’s not just about baiting, but my rights! I should have a right to choose how I want
to hunt my animals. After all, I’m the one whose paying lots of money for my tags every year.

My son will be taking hunters ed this year and he want him to be able to experience hunting over bait
whether that’s his thing or not, but at least he has the CHOICE to decide what’s his best strategy to
hunt. He’s obviously to young to voice his opinion right now, but that’s why he has a mom to stand up
for him and his future in hunting).

I’m asking you, to please keep baiting available for all the hunters who choose to go that route. If you
decide to ban it, then I will no longer continue to hunt in the state of Wa and go elsewhere, along with
my husband and son. Think about all the other hunters who will end up doing the same thing. Think
of all the money you’ll be missing out on, and all the other states will gain. Is it really worth the risk?

Hello,

I live near conconully WA in the Omakang valley. You have probably heard from a lot of people that
support baiting and I believe most of them are guides or hunters that hire guides. In our area the
guides can lease land in between dwi lands and bait the migrating deer in November bow season.
They kill a lot of large mule deer and the high mountain ridges are littered with apples in
Nov. There would be less late bow hunters and less successful hunters. I hunt the late season fair
chase. The ones who support are guides and hunters that care more about their success than the
wildlife.

Thanks for listening.

To whom it may concern

I have been hearing recent rumors that the practice of baiting deer and elk may become illegal in the
near future. I ask that you would reconsider that. I do not see any reason to ban it. Many people enjoy
being able to hunt that way, and many people can only hunt that way. Think about the smaller
property owners, the elderly, the disabled, and the youth hunters. It would seem unjust to take away
the opportunity from them, and others.

Please don’t take that away from us!

Hunter Ethics and Fair Chase

I am writing you today to express my displeasure with the new proposed management plan.
Specifically the “Hunter ethics and Fair Chase” issues listed in the plan.

If baiting wildlife for the purposes of hunting is such a crime, why stop there? How is the use of food
plots, hunting over (planted) agricultural fields, or an apple tree different? Or using chum to lure fish
to the boat? How about bait in general? There is the same differences of opinion and issues in the
fishing community as well. Fly fisherman versus bait fisherman. How is the issue of baiting wildlife
any different? How is the WDFW addressing these issues?

The WDFW and a few hunters are concerned about the “public perception of hunters”. This is the
same public that has no ethical problem buying and consuming commercially farmed animals. These
animals are killed in slaughterhouses and offer absolutely no “sporting chance” of escape. Most of the
general public could care less where their food comes from. Must all hunters do.

Billions of animals are killed in the U.S. every year for the public to consume. The arbitrary rules of
“fair-chase” are not what make killing an animal for food ethical and acceptable to the general public.
So, rather than perpetuating the myth that the public’s source of protein is somehow ethically and
morally superior to that of a hunter. Just because some hunters choose tactics, methods, and
equipment that can improve their chances of harvest and/or making a humane kill.

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It’s disturbing that WDFW and a handful of hunters have confused humane hunting method preference with “ethics.” The rules some hunters place on themselves to make hunting more challenging is their personal choice, a preference, it has nothing to do with how ethical his or her kill is. Humanely killing an animal for food, whether by hunting or slaughterhouse, is ethical.

Every method of harvesting animals used by hunters today is as ethical as the way beef, pork, and chicken makes its way to the public’s dining table, including baiting and the use of electronics for hunting. But for some reason WDFW intends to “facilitate public debate” about restricting methods that are humane and therefore, ethical.

WDFW also intends to “conduct public outreach.” I suggest that outreach include the truth about how humane and beneficial hunting is today even with (and in some instances, because of) baiting and new technology. And, using the standard set by the meat-eating public every day, highlight how ethical it is.

While some in the hunting community may enjoy debating their personal preferences regarding baiting and other humane hunting options, the final choice is for each individual hunter to make for his or her self. No One Else! I have never killed a deer over bait or feed. Instead, I used baiting as a tool to locate mature whitetails and it keeps me in the woods doing what I am passionate about year round. A tool that was handed down for my father and one I hope to pass to my children. A tool that when done right, is very rewarding.

Hunting is a fun, family oriented, beneficial recreational activity conducted in a very safe and ethical manner today. WDFW should spend more time celebrating and educating the public through outreach and spend less time entertaining the views of people who are opposed to hunting and the management of wildlife.

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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Keep baiting legal.  

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan. The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting.

Please reconsider the decision to make baiting big game illegal.  Baiting can be and is used as a management tool. It allows you the opportunity to take older animals out of a herd to let the bucks/bulls in there prime to do the breeding. I can also be used to reduce the herd size in areas that were hit hard by fire such as the Pateros area this year. Baiting can also "help" to increase the success of senior hunters and also the youth hunters which this state needs more of in the first place. As a Hunter Education Instructor I am 100% for baiting in that it gives a mentor more time in a controlled setting to help a young hunter identify there target and practice the safe handling of there firearms. Once again, I hope you reconsider this. Thank you for taking the time to read my email.

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Thank you for taking the time to read my email.

Please keep baiting legal. It a very useful tool for selective hunting. It also is very useful in thick country.

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Baiting is good for hunting. Some areas are so over run by game they need to be managed. Baiting is a good way to do this. Responsible hunters do this to take mature animals. Please don't take away our rights to do this. Don't let non hunters make this decision for us.

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I would like to write a short line why we come from Alaska to hunt in Washington every year. Baiting, Baiting, Baiting. We do not have the time to fly to your wonderful state to target deer watch them all season and figure out there patterns. As I'm sure for alot of people that live in the city's in Washington that can't drive to there hunting spot 10 times before season scouting. Baiting does not make it easier to harvest an animal but it does help in finding a nice mature animal. Also the money that will be lost will be tremendous. You are going to do what your going to do but that's my $.02.

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I am writing this to help you realize how benificial it is for the animals, the hunters, and the state to keep baiting as a legal technique for Washington hunting. I personally know nearly two dozen non resident hunters that come to here to take advantage of the hunting opportunities Washington has to offer. And at this years rate of $860 for deer, bear, elk, and cougar hunting license fees, that will be around $20,000 on only licenses cost that the state will be losing. Not only that but the small town hotels/lodging, the restaurants and feed stores, the farmers selling alfalfa bales, and many others will not benefit from these hunters coming from out of state if the use of bait is illegal. Now add up the numbers of all non resident hunters and that is a large portion of the budget for the game department.

Not only the state but also the hunters will hurt from this change in regulations. The use of bait is used by a large portion of archery hunters across the state. The number of archery hunters will decrease dramatically and if they do stay in the sport they will most likely resort to muzzle loader or rifle hunting. We might as well say good bye to archery departments in stores and a huge loss in numbers of archers across the state.

I cannot say personally for all across the state but I know alot of areas in Northeastern Washington are too thick to hunt on foot and unfortunately causes more people trying to hunt either walking the roads with a very small opportunity to get an ethical shot, or even worse they will attempt to shoot out of a vehicle. Neither shooting through brush or out of a window are as ethical for the animal or the hunter as sitting in a tree stand with an almost birds eye view over a bait pile waiting for a clean shot at vitaes without any obstructions. If nobody hunts areas too thick to not hunt out of a tree stand then over population could be the next problem and could very easily cause a large fatality rate from diseases.

So please consider this email when deciding on the 2015 hunting regulations. Think of how harmful it will be to the animals and the state. Thank you!

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I was asked to email on baiting. Please keep it.

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Game Commission, RE: Deer/Elk Baiting issue within the newly proposed Game Management plan. I am very much PRO-baiting . Please don't allow the anti hunters take this away from us true hunters.

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Dear To whom it may concern.

I feel that baiting big game is very ethical and also is very good for the economy in the sense that baiting isn't just putting bait out and deer come in, there's a lot more to it. Bait is almost not even the most important factor. When baiting turns out gas is almost #1 in this whole process. Driving to find the bait site , driving to get bait , driving to put up bait site, driving to check cameras on bait every week, and this is for one bait site most of the time you have multiple which means more fuel and I forgot to mention batteries for cameras. I have spent hundreds of dollars on bait alone some years and didn't harvest a animal but helped with leaving mineral blocks out for the deer to have thought the winter. People have the misconception that baiting means 100 % success. On the success issues well your allowed one deer a year and if baiting helps I don't see anything wrong with that its not like your killing every deer that comes to the bait, in fact like I said before people that bait actually do more to help the deer other wildlife with the months of added minerals and other supplements. There's so much more I can say about this subject but this will at least hit the key points.
and hopefully help keep our baiting alive.

Thank you for reading this e-mail however with WDFW proposing in the "no baiting" this is going to make archery hunting a whole. I personally know nine hunters who would be extremely limited or restricted in their opportunities if baiting were to be illegal. You see, Sir, our elderly and youngest hunters benefit from this option.

I realize that there are a few outfitters who elect to bait for their clients and it is done to the extreme and it is not doing the elk or mule-deer herd much good in those areas. If those are problems to be addressed then please address them with a specific plan. The state - as you know - is an incredible and diverse one. This would surely be a blow to the hunting future in our great state.

Mr. Anderson & Fellow Sportmen,

I understand that removing baiting as a legal means of pursuit for deer and elk is an issue the Department of Fish and Wildlife is currently mulling over. I urge you to invest yourself into the hunting community as a whole. I personally know nine hunters who would be extremely limited or restricted in their opportunities if baiting were to be illegal. You see, Sir, our elderly and youngest hunters benefit from this option.

I realize that there are a few outfitters who elect to bait for their clients and it is done to the extreme and it is not doing the elk or mule-deer herd much good in those areas. If those are problems to be addressed then please address them with a specific plan. The state - as you know - is an incredible and diverse one. This would surely be a blow to the hunting future in our great state.
{
"document_text":"dancing late season for the last 4 yrs. It is far easier to draw on a deer in the Mid West than hunting over bait in our state. The deer are very alert and a hunter must be very quiet. So, why would I condone hunting with bait? There are not enough deer in the late season to sit on a trail with a bow. The cover north of Spokane in the Colville area can be very thick. I think it would be pointless to try and hunt during the late season without bait.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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Please continue to allow big game baiting. It has not helped my success ratio since I am lifetime 0 for 8 years success. But I do enjoy getting the off season trail camera photos. It keeps me interested in purchasing a hunting license every year. Some day I will be able to get my daughter a deer. Thank you

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I believe that baiting big game should be allowed in the state of Washington. I also believe we should be able to bait bear.

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To the Washington Fish and Wildlife Commission:
I support the use of bait for ungulates.
Don't screw the whole state because a couple of outfitters

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The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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I support the optional use of baiting for deer and elk, and strongly oppose any proposed ban or alteration to the current baiting regulations. What biological evidence do you have for banning baiting? Is this decision to ban baiting come about from public perception that it is not ethical or something such as? Who brings forth the opposition to baiting? in my first 40 yrs of hunting wa state I never been asked since I am now older and have some disabilities I now use bait. Baiting is not a sure thing to harvest a animal, I didn't harvest a elk yet this yr and I baited. As the Dept of fish wildlife should be working to keep what we hunters have and you not taking anything away from us hunters and fishers. We are the people who buy licenses and pay your salaries. You have already introduced Gray wolves into our state which will make it more difficult in the coming yrs to harvest a deer or elk. I will tell you this that if baiting is banned you can kiss my license money good by as myself and my wife not going to sit in a tree stand and wait on hope without bait.

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Baiting and hound hunting are a win/win for the state of Wash and the people of Wash. The state could add an extra fee for any persons wishing to use bait or hounds for hunting. The state is also missing out on revenue by continuing the ban on baiting and hound hunting. I am a deputy sheriff in Yakima County and see first hand the problems caused by the state's inability to manage the bear and cougar populations effectively. The state is also missing out on revenue by continuing the ban on baiting and hound hunting. The state could add an extra fee for any persons wishing to use bait or hounds for hunting. Baiting and hound hunting are a win/win for the state of Wash and the people of Wash.

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I am a deputy sheriff in Yakima County and see first hand the problems caused by the state's inability to manage the bear and cougar populations effectively. The state is also missing out on revenue by continuing the ban on baiting and hound hunting. The state could add an extra fee for any persons wishing to use bait or hounds for hunting. Baiting and hound hunting are a win/win for the state of Wash and the people of Wash.

Please support baiting. Outdoors people are the best advocates for conservation. Keep in mind that baiting is something that has proven over the last ten years to have zero effect positively on anything. Nature doesn't need any silly regulations like this. Let Common sense prevail.

Hello,

I just wanted you to know how much I truly have a passion for viewing pictures on my trail cameras with my family and friends please take this into consideration. We should be able to feed.

Hello again,

If this passes I along with many other hunters will be buying out of state licences to hunt in a state that is being well managed! Sorry, but over the years Washington has became a state nobody wants to visit. Over the years the latter archery season has changed dramatically. Of towns bring in significant revenue during the late archery season because of hunters. This will change dramatically. Deer harvest numbers will drop significantly if this happens and a lot of money off of those who want to bait? Charge a $10 or $20 fee for a baiting permit, but don't take away baiting all together. Deer harvest numbers will drop significantly if this happens and a lot of hunting will be ruined.

I think am submitting this in regards to the baiting issue for deer. There has been some serious discussion around this topic on the hunting-washington.com forum. Having hunted whitetail in Eastern WA for the past 10 years, I can assure you killing a whitetail buck with a bow without bait will be put near impossible. You will kill the hunting for a lot of people, especially archers on the late season hunts, and elderly people who that's the only method of hunting they have left like my dad. Taking away baiting will take away his hunting. A lot of towns bring in significant revenue during the late archery season because of hunters. This will change dramatically.

Baiting is expensive as it is. Usually we hunt out of tree stands therefore investing money there, investing significant money in trail cameras, harnesses, warm clothes, etc. Maybe the state could make money off of those who want to bait? Charge a $10 or $20 fee for a baiting permit, but don't take away baiting all together. Deer harvest numbers will drop significantly if this happens and a lot of hunting will be ruined.

I am all for baiting both deer and elk in the state of Washington. This is a hunting tactic dating back hundreds and maybe even thousands of years. There are no scientific studies that show any evidence of this tactic.

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Thank you for your comment.

I think am submitting this in regards to the baiting issue for deer. I don't think there is anything wrong with baiting for deer. There has been some serious discussion around this topic on the hunting-washington.com forum. Having hunted whitetail in Eastern WA for the past 10 years, I can assure you killing a whitetail buck with a bow without bait will be put near impossible. You will kill the hunting for a lot of people, especially archers on the late season hunts, and elderly people who that's the only method of hunting they have left like my dad. Taking away baiting will take away his hunting. A lot of towns bring in significant revenue during the late archery season because of hunters. This will change dramatically.

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Please do not remove baiting from hunting. Especially for archer hunters.

As an avid archery hunter, taking away baiting would greatly effect the way we as archery hunters approach hunting. Instead of good game management, where you can watch and observe what deer are coming to buis and how old they are then making an ethical decision on which deer to hunt and harvest, you would be pressuring hunters into not passing on certain deer that normally an educated hunter would.

Please do not remove baiting from hunting. Especially for archer hunters.

This is a comment about the proposed 2015 to 2021 Game Management Plan. I do not support the proposal to ban baiting of deer and elk. The ban would reduce the opportunities for many disabled and senior hunters who can no longer hunt effectively due to reduced mobility. I submit that the ban would not have a large effect on game populations. Baiting deer and elk is a traditional hunting method for many people and should not be banned just because it is not popular with the majority of the hunters who commented and filled out your survey. Is there a valid "Game Management" objective that would be accomplished by banning baiting?

The hunting regulations are already so complicated you just need to consult a lawyer before you go to make sure you are not in violation of any laws. In your ban would it be illegal to go over to your apple tree and shake the branches so apples would fall and attract deer? Could we hunt by a apple orchard? How far away from the orchard should we have to be? Could we plant a food plot for the animals? Banning baiting will add another layer of confusing regulations and not effectively help to manage our game animals.

I would also like to express my support of continuing to allow baiting for deer and elk for hunting in Washington state. While I am not a resident of Washington State, I am a landowner there. I have enjoyed hunting in the state of Washington for over 20 years and will continue to make that trek north, paying non-resident hunting fees for that privilege. Being able to hunt ethically and yet still use baiting is a great benefit and draw for out of state hunters, as well as residents. Please consider retaining this feature in your hunting regulations. Thanks.

I would like to voice my concern over the possible elimination of baiting deer. I believe by doing this it will adversely affect disabled hunters ability to enjoy hunting. Disabled veterans and disabled kids need to have the opportunity that baiting would allow for them to have any chance at success. I respectfully ask that you reconsider this decision. Thank you

I oppose a ban on deer and elk baiting. If an area is getting abused or needs to be managed better so be it not a complete state wide ban. A limit on amount like a 1 foot by 1 foot square of bait to stop the buisels of apples being distributed. The survey of if hunters agree on baiting or not doesn't mean hunters want it banned. Further consideration would be appreciated.

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I oppose any ban on baiting deer/elk

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I have been hunting in Washington state for 20 years. I have attended commission meetings and spoken at those meetings about changes in regulations. I have recently become a hunter education instructor and a master hunter.

Since this year's survey on proposed changes in the upcoming game regulations I have heard rumors that changes made be made to baiting rules. I want to let you know that I am strongly against any

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Thank you for your comment.

Some consider baiting an unethical hunting practice, however, baiting typically allows for more ethical shots on deer and elk (especially for archers). In a baiting situation, the shot distance is typically pre-determined and is more likely to be within the hunter's comfortable range. It is also more controlled as the animal is usually focused on the food and less likely to jump the string. In my opinion, baiting offers a better opportunity for clean, ethical shots and reduces the amount of wounded game.

As a whole, I don't think the percentage of hunters that bait is very high. I would say the majority of hunters that I know do not bait deer or elk.

1. Stop managing the hunters and start managing the game that we pay you to manage. Show me the proof that half of hunters are against baiting. Stop trying to drive a wedge between hunters with this nonsense on baiting. You have no scientific reasoning for this. If you continue down this path we will remove you from your job and get some people in there that will do what they are paid to do.

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change in the baiting laws for deer and elk. I believe that baiting is a productive way to view animals in
your area and in many cases is beneficial to animals. For some hunters this is there only way to still
enjoy hunting. With hunter recruitment continuing to be a concern of the WDFW I don't think it is a
good idea to limit one method of hunting. We should not be taking away opportunity. I haven't seen
any proof that baiting is detrimental the herd health and have seen no data showing that it affects
harvest numbers. If there are areas that are being affected by the baiting either in herd health or
excessive harvest numbers I am certain a change to the harvest limits or dates can be adjusted in those
areas to offset the baiting. I would like to see proof that baiting has a negative affect before those
changes are made rather than knee jerk reaction to complaints from a few or survey results diluted by
too many options.

Thanks for your time and I hope these are all just rumors and baiting is allowed to stand status quo in
the upcoming cycle.

To whom it may concern,

I have recently heard about Washington hunting forums that deer baiting might be banned in this state. I
am curious as to why the game managers in this state are so bent on making hunting more and more
difficult for their constituents? Is this decision backed up by science and field work or is it just
another chance to decrease hunter odds?

I use bait (apples) to find and pattern deer with game cams and do not hunt over it. It is a useful tool
for figuring out deer here on the west side. Why must it be banned? Will there be a vote or chance to
voice our concerns?

We have so many restrictive laws on hunting in this state. Sometimes I hunt with a muzzle loader but have
a very hard time seeing with open sights so I rarely get a chance to take a shot. The vast
majority of states I our union allow scopes, 209 primers, etc... Those hunters can actually hunt
effectively with a muzzleloader. It seems like the state is working towards eliminating hunters not
encouraging them.

Please let me know what is being considered regarding baiting in Washington for deer. Also please
consider what all of the hunters want not just a select "vocal" few.

To whom it may concern,

I wanted to send you a quick note about the feeding/baiting wildlife issue on your agenda. Perhaps
instead of eliminating wildlife feeding/baiting, the department could educate people about what is
the safest and most appropriate types of food to feed during specific times of the year. For every
feeding station that a hunter uses, there usually maybe one animal harvested and a hundred animals
fed through the toughest part of the year (post rut, and throughout winter). As far as the argument of
concentrating animals for predators, I have fed apples, alfalfa, and grains to deer and for more than 15
years. In that time I have acquired tens of thousands of amazing wildlife pictures but only 3 cougar
pictures, 2 coyote pictures and 2 wolf pictures. The vast majority of people never get pictures of
predators. Finally, my children have been filled with such great joy as we sit down together to look at
all the pictures we have acquired. It has been a great opportunity teach them about the amazing
wildlife we have in our state.

I would like to voice my opinion on the discussions over baiting of deer/elk. I have no problem with
the current regulations as they are written, in fact I think it is a good thing that allows for disabled and
youth hunters to have a better chance bagging an animal. I could go on and on but I think this simple
"vote" to keep things as they are is all I need to get across.

Thanks for the time.

I would like to state that I like the hunting season and rules the way they are with the exception that
we should be allowed to use electronic devices for sighting and luring of game animals.

Prior to the ban on electronic powered decoys for duck hunting I experienced a duck hunt using a
rotoduck motorized decoy on the Columbia river in Washington State near Umatilla. Our hunting
party consisted of myself and two other hunters.

Using the motorized decoy was astonishing as it caused flocks of mallards to focus on the decoy
specifically. It was as if they were on a string falling out of the air in a graceful spiral toward the
spinning wing decoy. When we rise to show the first flock, which numbered about 18 birds, I was
amazed to see that they didn’t flare or fly off erratically when we took aim. I could see that the lead
birds were actually looking right down toward the spinning wing decoy only 10 to 12 feet below them.
They were just fluttering in front of us mesmerized by the movement. Even though the early morning sky was dark and overcast I was able to easily recognize a drake mallard and fired a shot at
about 30 yards which killed the bird instantly.

Over the next 45 minutes I went on to shoot 6 more drake mallards all in similar fashion without
missing a single shot! In over 30 years of duck hunting I have never before done that, my hunting
partners also, missed very few times.
It was my experience that the motorized wing decoy caused our party to humbly harvest all of our
birds in unprecedented speed and with few, if any, cripples and not a single lost bird. We ended our
hunt 45 minutes after the start of shooting hours with 20 drake mallards and one hen, well under our
hour limit of 3. The motorized decoy caused the birds to come in closer and stay focused on the
spinning wings while we were able to easily find drakes to shoot.

To whom it may concern:

My name is John Lenarz and I have hunted with a guide in Washington the past two hunting seasons.
Considering a ban on baiting for purposes of hunting. As a non-resident hunter and tourist of your
state, I wish to express my objection to this proposal. I feel the hunting opportunity for sportsman like me,
and ultimately may affect their perception of hunting.

My hunting guide in Eastern Washington has informed me the Fish and Game department is
preparing to make a rule decision at the April Commission meeting. The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting.

Your comment is related to the hunting season setting process which is separate from the
process of developing the Game Management Plan. The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting seasons. The on-line survey which was not a random sample of hunters, showed 63% of hunters in favor of baiting and 37% opposed to baiting for deer and elk, with those hunters preferring some level of restriction on the practice.

A random survey of hunters, conducted by a professional polling company, showed Deer Hunters were 59% opposed to baiting, 20% were neutral, and 21% supported baiting. The same survey of hunters reported that Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting.

I would like to comment on Objective 6 pertaining to the use of bait for deer and elk hunting. I feel
there is a great discrepancy between the two hunting modalities. I thoroughly enjoy the privilege of hunting and would hate to be forced to “hang up my bow” in the state that I call home.

My name is Charlie Wells I am 38 years old and have been an avid hunter and sportsman most of my
adult life. I would like to take a brief moment and express my concern on the proposed changes to
baiting big game in WA State. As a bow hunter with a very short season, that does not include
optimum hunting days during the rut, I feel that baiting is necessary in an effort to make a quality shot
and not wound animals. I am also a land owner that encourages quality habitat for big game
species. My land does not allow me to produce forage to compete with massive 300+ acres of alfalfa tracks or other cultivated food sources. Bait allows me to draw some animals (not all, I have tried) into my hunting area and to be more selective in my deer harvest. Which in turn allows for better hard management and strategic removal of animals with lesser or fully mature
stems. Additionally, I am less rushed to take a low percentage shot that may result in a wounded
or lost animal (my greatest fear). Most importantly, I am a father who would like to pass along my
love of the outdoors and sportsmanship to my children. I would eventually like them to enjoy bow
hunting as I have. If baiting becomes an illegal practice it will greatly reduce our chances for success
and ultimately may effect their perception of hunting.

I would like to encourage WA Fish and Wildlife to look deeper into the survey results and compare
Contrast the responses from rifle vs. archery hunters. I am confident that there will be a great
variation in opinion among the different hunting modalities. I sincerely hope that you take the appropriate time to weigh all responses in your decision process. I thoroughly enjoy the privilege of hunting and would hate to be forced to “hang up my bow” in the state that I call home.

Hey please keep baiting big game legal in Washington. I and many I hunt with benefit from it. Thank you.

Your comment is related to the hunting season setting process which is separate from the
process of developing the Game Management Plan. The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting seasons. The on-line survey which was not a random sample of hunters, showed 63% of hunters in favor of baiting and 37% opposed to baiting for deer and elk, with those hunters preferring some level of restriction on the practice.

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2015-2012 Game Management Plan:

I would like to comment on Objective 6 pertaining to the use of bait for deer and elk hunting. I feel
that baiting should be allowed but more restricted. Salt licks yes but using fruit such as a large pile of
apples not allowed. The carbohydrates/sugars are not good for the digestive system of deer/elk. This
effectively pertains to outfitters who dump large piles of apples. Thank you.

Your comment is related to the hunting season setting process which is separate from the
process of developing the Game Management Plan. The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting seasons. The on-line survey which was not a random sample of hunters, showed 63% of hunters in favor of baiting and 37% opposed to baiting for deer and elk, with those hunters preferring some level of restriction on the practice.

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To whom it may concern. I have been an avid hunter sportsman for many years. I would like to
express my concern on the proposed changes to baiting big game in Washington State. The archery
baiting. The same survey of hunters reported that Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting.

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season in Washington is very short and does not include the rut, it is very hard to get an animal to cross your path in archery range without a food source. I do not own land alfalfa fields or apple trees, I hunt public land. Hunting public land with archery equipment is a lot of work and I enjoy the challenge. The only way I have ever seen deer...is if I have an active bait set up. I have read the survey and I believe that most of the people in the survey are rifle hunters I do not have the luxury of taking a 200 yard shot. This is my son's first hunting the archery season we sit in a ground blind together. I do not know of any other way to get a deer within range without owning my own land and planting food plots or apple trees our bait allows for an ethical shot instead of just wounding animals on the run. I hope Washington fish and wildlife will take into account the challenges with archery equipment in Washington. I am sure the goal is to eliminate archery hunting in Washington this is the way to do it. Thank you for your time and consideration in this matter.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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I am writing you with my opinion about Hunter Ethics and Fair Chase. I believe the department has gone too far in considering to ban baiting on the premise that it is not fair chase. In my opinion, the public who does not agree with hunting does not discriminate between baiting and non-baiting as a basis for their opinion. The non-hunting friends I have do not oppose hunting based upon baiting they oppose all hunting in general. I have asked many hunters and no hunters their opinion about baiting.

Lastly, baiting presents an opportunity for our youth and disabled. Some people do not have the time to grow food plots or apple trees our bait allows for an ethical shot instead of just wounding animals on the run. I have read the survey and I believe that most of the people in the survey are rifle hunters I do not have the luxury of taking a 200 yard shot. This is my son's first hunting the archery season we sit in a ground blind together. I do not know of any other way to get a deer within range without owning my own land and planting food plots or apple trees our bait allows for an ethical shot instead of just wounding animals on the run. I hope Washington fish and wildlife will take into account the challenges with archery equipment in Washington. I am sure the goal is to eliminate archery hunting in Washington this is the way to do it. Thank you for your time and consideration in this matter.

Hunting is a management tool, nothing more. All of the emotional and visceral aspects are secondary to the root of hunting which is game management. Using bait for hunting big game animals is merely another tool to assist in the proper management of game animals. It provides the hunter a means of selectively harvesting the animals to assure proper age/sex structure of various herds around the state based on size requirements that meet management objectives. Using bait is NOT detrimental to the big game population and it has been heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk. Leave baiting alone. As far as game cameras go, they have ZERO effect on the success of hunters. The animals move on a daily basis for the most part and totally change their travel and feeding habits based on the time of year as well, so if a person is seeing a particular animal on a camera during the summer, the odds of seeing the same animal during hunting season are astronomically low. Leave cameras alone. There is no possible way of enforcing this anyway.

In your hunter survey responses I saw that 63% of big game hunters hunt out of state...why do they think that is. If the WDFW implements these ridiculous changes, you will see that number go along with the process of developing the Game Management Plan.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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I noticed this subject comes up every few years and in my opinion the Ban doesn't make sense. Deer & Elk are herd animals they spend most of their lives in close contact anyway. I've heard the argument "Fact!" from some other part of the country? From what I see there are several forms of Baiting, growing food plots is very popular, placing apples on the ground or corn piles all natural food sources. Where is the Harm?

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Although I understand that it may seem like a good thing to eliminate baiting and the use of electronic equipment, I'd have to disagree that it's a reasonable change. Baiting and the use of electronic equipment is all that some hunters know; although it's new modern technology, it doesn't guarantee a kill or make it unfair. We need to embrace new technology and allow it to work how it was designed, not ban it. Baiting and electronic equipment brings a large amount of profit and revenue for our economy during the hunting season. Also, hunters put hours upon hours in checking cameras, putting out feed, and tracking wildlife; it's not like we as hunters do not put in our time and effort to be successful.

I am very unhappy with this decision, and it's time that you allow the true hunters to choose our own fate, not the people who do not understand how it really works. Lastly, baiting presents an opportunity for our youth and disabled. Some people do not have the time or energy to hike miles upon miles to be successful, so how can we limit their abilities and challenge
Your ways.
I hope you can reconsider this new push and look at the big picture; we do not need to limit the use of equipment to bring numbers back up. I would love to see a stronger enforcement and harsher penalties on poachers. I guarantee if we stick together, find them, and make an example of them, numbers will begin to build. Don't punish the everyday Hunter for the deeds of a select few who try to pass themselves as "hunters."

"Thank you for your time and allowing me to present my opinion.

I would like comment on two portions of this proposal. First would be baiting for big game such as deer and elk. I feel there is nothing wrong with this practice. The majority of the bait fed is consumed by doe's and cows. This only helps them make it through the winter and helps healthy young deer and elk. Also I believe that during the survey, Hunters indicated that they did not want baiting by outfitters and guides so to ban baiting all together. Harvest levels are not going up, so why make a change.

Also the use of game cameras does not increase the hunters chance of bagging game. It simply gives him a chance to see what is out in the area he is hunting. Again, why would we need to make a change. Game cameras should be allowed to be used any time.

If the game department wants I make a change get rid of the hunters access pass and just require a discover pass so the public doesn't get confused and get tickets because they have the wrong pass. Or maybe they could lower tag prices. It is hard enough to find time and money to go hunting. And it seems like the game department wants to eliminate anything that they think they will aide hunters! If these two things are banned the state loses tax revenue from the sale of bait and cameras. The many small business and farms that sell these things lose out. This is a bad move that I am firmly against.

To whom it may concern,
I've heard rumors that baiting may become illegal next year. I'm not sure who or what is behind all of this but I see no reason why it needs to be banned. I am an ethical archery Hunter that prides myself on knowing all the rules of this sport that we enjoy so much. My wife and two young sons spend quality time together hiking the woods of NE WA every summer, putting out game cameras in search of our next back to pursue that fall and winter. They get so excited to see what is on the camera. Photographing this passions away from us. Banning baiting won't just take away quality time from numerous people but it will also most likely take a toll on local farmers and stores like North 40 Outfitters. Some people have the poor misjudgment that baiting is simply throwing food out and showing the elk their favorite spot. Not the case these bucks that we are after year after year. Not the masters of their domain, only coming into the camera after or before legal shooting hours, but it gives us hope. I understand some people don't believe in it, that's fine, don't do it then but please don't take it away from the people that do enjoy it. We spend our hard earned money every year on tags and license to hunt Washington state, with the new 4 pt min rule and wolves being introduced into Washington it is making it tougher and tougher to continue to hunt this state. If this law passes it will surely convince me to spend my money and efforts else where. You guys have such a huge resource that you are missing out on as far as research and study's of animals in this state, let's work together on this, there are hundreds of dedicated hunters out there that run cameras all year long. So I'm going to end this by asking you please don't take this away from us. If there are any meetings coming up please let me know. Thank you for your time.

I have stated my main concerns. I believe there are several reasons to maintain baiting and am not opposed to rules and requirements regulating baiting activity. The only support I have heard WDFW describe in the game management plan for ending baiting amounts to nothing more than a "popularity" contest. While a vocal minority may have been effective in getting attention on this issue I do not believe a popularity contest is how we should make good wildlife policy.

I believe that the WDFW should use the Game Management Advisory Council, of which I am a member, to draft rules that regulate baiting/deer/elk to address any serious issues regarding this matter. Regulated baiting could provide revenue to the department and improve perception of baiting to individuals who don't engage in the practice.

Overall, I believe there are some misconceptions regarding baiting amongst the public and other hunters who have never baited.

Misconception 1: Only a few states allow baiting
Reality: Most states allow baiting for various wildlife species and all states allow bait for fishing. I believe what other states do should not drive decisions in Washington. However, if you look at all the states that allow bear baiting, food plots, salt, attractants, and scent it is a misconception to suggest or imply that Washington is alone in its current practice of allowing deer/elk baiting.

Misconception 2: Baiting is easy, lazy, and unporting
Reality: Baiting deer and elk is very difficult and takes a lot of effort and WDFW’s own harvest data states that allow bear baiting, food plots, salt, attractants, and scents it is a misconception to suggest or implying baiting is easy, lazy, and unporting.

Baiting could provide revenue to the department and improve perception of baiting to individuals who don't engage in the practice.

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Misconception 2: Baiting is easy, lazy, and unporting
Reality: Baiting deer and elk is very difficult and takes a lot of effort and WDFW’s own harvest data and wildlife managers acknowledge it does little to improve harvest. While there are always slobs that dump a load of apples off the side of the road hoping to attract a deer to shoot, the reality is those lazy methods are largely ineffective and those that successfully harvest game at a bait site do so after incredible amounts of work, knowledge, and skill. Regulation and rules pertaining to baiting could significantly reduce these slob baiters.

On the sporting aspect - nothing about baiting reduces an animals ability to elude, detect, or escape from a hunter. Most animals are very wary of bait sites and again harvest data supports this notion. Baiting is a different method of hunting compared to stand and stalk, calling, glassing, etc. and like each of those methods it has its pro's and con's. With hard work and given certain conditions and a little luck it can result in harvesting a legal animal just like all of the other legal methods of hunting.

Overall, baiting provides a more controlled setup which can be an effective, and sometimes the only, way to provide quality opportunities and experiences for youth, new, disabled, and senior hunters. Making baiting illegal statewide will negatively affect hunter recruitment and retention, which is counter to objectives of WDFW. It is also discriminatory against the user groups mentioned above as it will disproportionately effect their opportunities to harvest game far more than those who are experienced and physically capable. When a major focus of WDFW efforts is to recruit and retain hunters, I find it hypocritical that WDFW would be evaluating different methods of hunting to eliminate when there are no biological or harvest reasons to do so.

My preferred solution to this complex problem would be to draft a set of rules to make sure baiting is regulated appropriately and in a way that allows responsible hunters to continue this method of fair chase hunting.
Thank you for the opportunity to voice my opinion on the subject of baiting and electronics usage. I support the optional use of baiting for deer and elk and the use of electronic equipment such as trail cameras. To be clear, I oppose any proposed ban on baiting for deer and elk.

According to the WDFW website, “The commission shall attempt to maximize the public recreational...hunting opportunities of all citizens, including juvenile, disabled, and senior citizens.” This is the mandate that sets the overall policy and direction for managing wildlife.

Looks to me like you are trying to reduce hunting opportunities instead of creating them. No wonder we are seeing a steady decline in hunting individuals and hunters becoming agitated with each other.

Please understand, this is not an ethical issue. This is an attempt to regulate the "aesthetics" of the hunt based on the personal values of a majority at the expense of a minority. I don't see anywhere in the WDFW's mandate where it says you should manage the aesthetics of a hunt based on majority rule at the potential expense of recreational opportunities for hunters. The reality of baiting and ethics is that it's one of the most ethical forms of hunting because it allows the hunter time to take a shot at a known distance which will increase the likelihood of a quick and humane kill. Everyone has different views about the best way to hunt and what ethics to apply but that does not mean it is the same for everyone and baiting is truly an ethical way to hunt. My guess is most people opposing this have never done it or would realize it is not like "shooting fish in barrel" but rather difficult to accomplish.

We should preserve this method of hunting because it provides a very unique opportunity for hunters to practice something that has been utilized since humans first started hunting. It is a right that has been utilized by hunters in Washington since the state was created and it is a tradition of our state that should be preserved.

Take what you learn as you go, and practice what you preach. Thank you for your time.

Yours truly,

[Your Name]
WDFW should be proud to protect.

As someone who has been thru reconstructive back surgery and is now limited on what I can and can’t do, I bait hunt because it offers me the best opportunity to harvest an animal. If you take this option away, you are essentially taking away my hunting opportunities as well as restricting opportunities for many other hunters in this state, who like myself, pay taxes and support the WDFW and economy with our hunting dollars.

I assure you, my wife and children, as well as all the hunters I know, feel the same way as I do.

PLEASE DO NOT TAKE THIS OPPORTUNITY AWAY!

I’m e-mailing about the Wdfw revisiting baiting for deer and elk. 2014 elk season is the first time I used bait to hunt elk. I see one elk in nine days of hunting. But my dad was able to harvest an elk. The first time elk hunting in ten years. He is 77 years old and didn’t think he was going to be able to hunt elk ever again until we tried baiting. He was very excited and pumped up at being back out in the field again with the boys. I have another friend who was in a car accident and injured his feet and has a hard time getting around. If it wasn’t for baiting her couldn’t be out hunting. I know there are a few people who abuse the baiting. Please take into consideration the people who don’t have lots of private land to hunt and choose to bait. Please don’t punish the many for the actions of the few. Baiting is a lot of work and your still only allowed to harvest one deer.

Thank you for the opportunity to provide our input and thought to the matter.

I’m strongly in favor of keeping it legal. Besides, making it illegal, weather we want to acknowledge it or not, will only make many people law breakers as they will continue to hunt the way they have their whole lives, with bait. They will be criminals just because someone else decided that they way they hunt is not right and now illegal. I don’t think that’s right to do, to take individuals rights to choose away.

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I’m like to add my comments on the deer/elk baiting proposed ban.

I’m highly against banning the baiting as it’s a very useful tool in harvesting game for those who choose to use it, especially the young and old generations who may be suited well to that style of hunting. Whitetail Archery is also another area that is extremely hard without baiting as our deer populations and the country they live in is much different than other places that do well without baiting. I firmly believe that archery harvest rates will drastically plummet if baiting is not allowed. I don’t see it much different than people who plant food plots or hunt over agricultural fields. The problem with congregating them to an area to spread disease or predators is also the same with farm fields, I’m not seeing that this is a valid problem. I also don’t like that it will effect many area farmers, and distributors of feed. Our area brings in a lot of money from people who come here to hunt and spend their dollars in our economy, this will be a hit to these people as well as the hunting community.

Leave baiting alone.

There is nothing wrong with baiting for deer and elk. You tried to stop this in the past as it was bad for the animals and that didn’t fly so a different tactic is being tried this time. Baiting has been around a long time and it is good for the animals as well as the hunter. As an older hunter that can’t get around so good anymore but is not handicapped, baiting extends my ability to continue to hunt as well as help mentor youth into hunting.

I’m e mailing about the Wdfw revisit...
coming through peoples windshields. So tell me again, what is baiting hurting? What are you solving
the economy will drop, deer population will increase, and more deer will be in the middle of highways
hazard, how you ask? Simple, highway deaths, that’s right, car accidents. If baiting is relinquished,
people during hard times as well as the risk of overpopulation of deer, which then leads to a safety
towns. Without baiting you run the risk of going broke and taking away one of the few things helping
I whole heartedly thank you for taking the time to read my letter and I hope it makes a difference

This is why I bring forth this letter, in hopes that maybe, just maybe my reasons, descriptions and
personal outlook on the issue will help turn you from the awful, heart wrenching concept of forever
debting the baiting of wild ungulates in your state. I have thousands of personal reasonings for
why baiting should not be outlawed. I could give you the sob story about how my children and
grand children wont be able to experience the amazing things I have, or stress to you about how your
going to absolutely shred and tear apart the one true thing in this entire god for sake mad ball of a
thing we call a planet that I enjoy an look forward to spending with my father each and every year as
I have done so for the past 11 years. But lets be honest, you don’t care about any of that, nobody does
and never will, nobody but me on my dad, so lets cut to the chase, the real reason why you shouldn’t
do it. Money. Its why we all wake up in the morning. Baiting stimulates your states economy more than people will ever imagine, I could go into the statistics and bore you to death with numbers, but why not hear the impact two people have on your state, myself and my father. Every
year since I was 18 years old, my father and I have purchased two round trip tickets to colville
Washington to participate in the baiting of deer an elk that has since then changed my life. We spend a
minimum of three weeks every year in Washington doing nothing but spending money, fueling your
economy, making sure politicians like yourself have a job, your welcome by the way, and we do it
generously, without hesitation, and every year we come back only with a plan to make our trip bigger
and better. I spend up to 1500 dollars alone just on my tags and license, a minimum of a 1000 on buy, 2000
on fuel, 2000 on plane tickets, 1000 in food, and were just getting this party started. Not to
mention all the shopping we do for family members each year with extra cash since where I live there
are no malls. So lets do some math every year without hesitation we religiously spend 7500 dollars in your state, all so I can walk around in the woods with a bail of hay on my back an a smile on my face. Also, that 7500 dollars, that’s our minimums my face. As for each and every year, that’s not to mention the gear we buy every year at the local Big 5, or the money we sink into vehicles
we bought down there as well as the mechanics we pay to work on said trucks. Man, it looks like we are 40 thousand dollars a year now in which we religiously spend in YOUR state simply because you are one of the last states that allow baiting. Now comes for the big news, last year
we purchased property in your great state, simply so we would have our very own, untouched baiting
home hole. We paid 60 thousand dollars for our property. Well once we bought the property we
needed a place to stay, so we bought a 15 thousand dollar trailer to stay in while we are there. WELL
WOULD YOU LOOK AT THAT 2 people in the past year alone, two people! Have successfully spent 85 thousand dollars in your state, and guess what, you want to take away the one reason for why we did it, you think we are ever gonna come back if it passes? You think we are going to continue
stimulating your economy? You think were gonna sink another 20 thousand into that property to build
a hunting cabin, that way we can bring family and friends down so they too can spend money in your state just so they can participate in the baiting of deer and elk? No, as much as it hurts me to say it, but thats on you, and I will simply take my money to a different place, congratulations you have
successfully cost yourself 85 thousand dollars, so that the state may not be much but thats only two
people. Thats not counting the other guys that pay guides 3-4 thousand dollars a day! To hunt and
but white tails. Thats what they pay the guide! Thats not counting fuel, tags, food, shopping. Thats
what they pay to simply sit in a tree, sounds crazy huh? May I remind you my father and I spent a
combined total of 85 thousand dollars in 27 days. Thats a little over 3 thousand a day, again, your
welcome. Im trying to keep this short an touch a lot of points so I imagine you get it by now, deer
baiting generates a ton of money in your state, but lets go to another important reason for baiting, the
deer. Baiting helps the deer population a great amount, one simple way for example is when the
winter is extreme and snow depths cover up most all food and hinder the young from moving or
surviving they stumble upon a little bundle of hope, a bail of hay, that I spent 85 thousand dollars to
set out. Now that fawn that was struggling and starving has a place to camp out an regain strength,
and even then you are not garenteed the buck, last year I had 92 hours in a tree before I finally
harvested the buck I targeted, did baiting help? Yes, but was that on me successful? No. My
perseverance and scouting and weeks of preparation are why I was successful. Baiting also allows less
skilled hunters to give a shot at bagging a buck, people like young kids. They are the reason hunting will
continue on. As well as handicapped individuals, they cant exactly hike like the woods and look
for a deer, they rely on baiting, but ending baiting your basically stripping there hunting abilities,good job. The more I argue my side the more I am unnable to see any reasoning behind getting rid of baiting.
Baiting helps regulate deer herds and dramatically stimulates the economy in the small farming
towns. Without baiting you run the risk of going broke and taking away one of the few things helping people
times as well as the risk of overpopulation of deer, which then leads to a safety hazard, how you ask? Simple, high way deaths, that’s right, car accidents. If baiting is relinquished, many hunters will stop traveling to Washington to hunt because there is no further incentive, the economy will drop, deer population will increase, and more deer will be in the middle of highways
coming through peoples windshields. So tell me again, what is baiting hurting? What are you solving
for the economy? No, we have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

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A random survey of hunters, conducted by a professional polling company, showed that 59% of Hunters were 59% opposed to baiting, 20% were neutral, and 21% supported baiting. The same survey of hunters reported that Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting.

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My name is _____________________________.
I am 69 years old. I am a lifelong Washington State resident, born and raised in the Spokane Valley. My hunting adventures began when I was 10 years old. I still have my hunter safety card from that first hunting year of 1964, and virtually every year during every Hunting/Fishing/Trappping License and tag, both notched and un-notched, since 1964. I was fortunate to have a Dad who not only introduced his sons to hunting, fishing, and trapping but also demanded and demanded safety, ethics, and sportsmanship all along the way. My early years consisted of miles and miles of “rough-and-tumble” hikes the for mixed-bags of birds over Springer Spaniels and rifle Mule Deer Doe tags, and eventually to Buck tags hunting in Lincoln, Grant, Whitman and Asotin Counties. In the northern counties of Spokane, Stevens and Pend Oreille my brother and I learned grouse hunting over those same Singer, and later the increased challenges of Whitetail Hunting. My evolution from quality-minded hunting and full bag-limits to quality-minded hunting came before I turned 50. Braggin’ rights were less important that the experience, adventure, the challenge, the dog-work, the surprise, the thrill, the sight of a mature buck with more than four points per side as a self-imposed minimum and eventually to killing a buck with a bow. I a 780’s, a .270, a .30-06, a 1917, a 30-06, and a .50 caliber. I do not have the desire to ever, ever, shooting a deer at over 125 yards and most were 40 to 80 yards, even when we sighted in every summer to out to 200 yards. These guns were retired in favor of the close range, home built 30 and 54 cal. muzzleloaders. I also took up Archery, during this time, successfully bugling and taking elk during September hunts from 1982 through 1987 in Idaho, while rattling in a few Whitetails from the ground in Washington State. Since 1989, I have hunted strictly with recurve bows. Also, in 1989, it was my turn to pass along my late father’s Hunting and Fishing tradition. My love for Traditional Archery got my son and me both into the woods together on week-ends and after school as we concentrated on early and late tree-stand Archery hunting in Spokane County and particularly Unit 127- close to home. Great times and memories. I would keep notebooks of land ownerships acquired from the Assessor’s office and I collected multiple of maps showing available public ground, all covered with “x” marks of tree-stand locations. This required lots of year-round hiking, scouting, and securing of permissions. The hunts themselves are pretty sedentary- sitting for hours watching nature in action all around. To find greater chance for success not only for myself, but also for my son, who, as most young men and hunting newcomers, would need some success to re-affirm purpose and maintain interest. Food sources, travel patterns, game trails to-and-from food sources, and rattling, use of scents, depending on season, were the practices employed. We built our own portable tree-stands and bought a few here and there. I remember one year, after partnering up with another like-minded, dedicated and ethical father-with-son, having 19 stand locations, all mapped and nick-named so we could pre-plan our evening weekend hunts, and be ready for all wind and weather conditions. The decade of 90’s consisted of lots of research and scouting that resulted tons of outdoor fun. The decade of the 90’s also saw the increased use of four wheelers, trespassers and poachers. I would spend nights, hidden in my truck, trying to catch in action the poachers with spotlights who would leave the gut piles on land of which I had secured permission.

Around 1995 or 1996, after years of stopping by and asking, I finally was granted permission to hunt a piece of property where I would occasionally see in my headlights, large bucks on the prowl, crossing a paved road, during the late season, as I was travelling to or returning from a more secluded location. This property had it all. The security was just looking for, and it was peppered with old apple trees. For nearly twenty years I have continued to hunt and enjoy the landowner friendship, some level of security, and mostly no other human interventions- meaning undisturbed dear. I enjoyed little competition though several have asked- on this 140 acres of heaven. I am losing this Shangrila, this may be my last season there. Old age and poor health has put the landowner in a group home, and it is the will of the daughters, that hunting stop at the end of this season, as they try to sell the property. I filled my tag there this last September with a 4x4 back of 3½ years. As for my future, I will be referring to my old hunting maps, hiking and scouting for apple trees and another Shangri-la.

This long introduction and background brings me to the subject of baiting. In my teen and college years, I trapped furbers and as you know, a large part of trapping involves the use of “bait” and scenting. I had some success on both Washington (when it was legal) and Idaho (both Spring and Fall). I killed a skunk 6-foot bear, over bait, in Washington one year. The next year, I drew and took a Mountain Goat in the Grilford Pinchot National Forrest. Each required a lot of scouting, research, physical work. The Billy was medium sized, but a proud trophy for me. The bear was trophy sized, and I am just as proud that half-size body mount in my den as the Goat hide hanging next to it. The difference between the two, for me, comes down to circumstances and challenge. Each required pre-season scouting and planning- one long distance, the other close to home. The Goat hunt had a finite block of time to which I could hunt. It was a long way from home. A close range recurve bow shot presented itself after days and several failed stalks. I was solo. The climb was exhilarating. It was a warm, blue-sky day with a wonderful view. A taking the bear, even when it was just as exciting. I had an almost infinite amount of time to hunt. Many bears were hitting the bait, a sow with cubs, and several small 1½ year old bears. This was before cameras were available. I would sometime see several bears in an evening! I observed large tracks in and around the site, and kept sitting every chance I could. Because of the circumstances of being close-to-home, and the challenge of restricting myself only to taking a large bear, I held out, and eventually I tagged the large Boar.

Even though the bear-baiting issue is long behind us in Washington State, the debate continues because Washington State has no laws on other large game concerning the practice outside of the
Initiative-specific Bears or Cougars. This apparently could change. Since I have had the opportunity for the last almost 20 years to Archery hunt over apple trees, I wonder as to the specifics to which some of the anti-bait hunters have issue. If I were to water and fertilize those apple trees during the pre-season, would I be baiting? If I were to cultivate and plant, much as a farmer would, a small plot of clover or grasses, would that be considered baiting? If I, as the last of the apples fall as they sometimes do, on a good year even as late as November, supplement those apples with other apples collected, also be considered baiting? I suppose some of these scenarios could be considered passive and one, collecting and re-locating of apples, could be considered active baiting, but is that really the question? Or is it one of misunderstanding? Between apples falling from the tree or from the hand, what is the true difference? And why the controversy? I consider myself an ethical hunter, and see little difference between hunting over apple trees, alfalfa fields, or pile of either where none is available. My years of experience have shown that all deer in the area benefit from the additional food. So in my early years I was surprised by killing several immature animals. Many yearling Deer, coll Elk, young Bear are killed by mistake in the hasty excitement of bump-and-shoot. More mature hunters can become effective in “still-hunting” and exhibit a higher level of self-control in not taking the first available animal. Some so-called Fair-chase advocates even go so far as to scorn the use of treestands. While placing restrictions upon oneself is admirable to make the hunt more challenging for themselves, what gives them the right to shut down a trophy class animal because it was still-hunted from a treestand? I can tell you that, for me, still hunting is far more enjoyable from an elevated stand than from the ground. There is so much more to be seen! What I am getting at in this analogy is perception. Why the look-down-thou attitude? Each ethical hunter is able to create his own challenges according to his own set of circumstances. Is the working stiff who puts corn or apples out really that much different from a person who hunts the apple tree, hay stack, or alfalfa field, or even that much different from the still hunter watching a game-trail that leads to or from that food source? While it may not be the one, some hunters take rifle shots at game at distances of several hundreds of yards and more, then not follow up responsibly after the shot because the animal did not “drop”, I would not be part of a movement to stop use of long-range guns or ammo against my hunting fraternity. If a well-practiced, accurate, and disciplined hunter challenges himself with taking an animal at long range and performs the necessary follow-up to recovery, same as a close range archer successfully follows a “drop”, I could not criticize his tactics to bag an animal. Another analogy would be that of a fly-fisherman looking down upon a “Bait” fisherman. Are not the techniques just really personal choice with one type of fishing as ethical as the other? And why is it that baiting is acceptable in fishing and not in hunting? Is it not the personal choice of the Sportsman?

There have been articles in my Spokane newspaper that claim disease will be spread amongst close congregate deer at “bait” piles, I have 20 years of observing deer over both apples, corn, or alfalfa, and their interactions are not the least bit different whether the apples, corn, or alfalfa are deposited by human hand or by nature even though those food sources are by human hand. Under apple trees and in farm fields, relaxed Does and Fawns, usually related, often touch noses and groom each other. Bucks showing any antler growth, usually at ½ years, will run off mature Does, and aggressive mature Does will, in turn, run off more submissive Does. And ultimately, nearly all apple trees, and all corn and alfalfa fields are a result of the human hand, so would not hunting near or around such apple trees, corn or alfalfa be considered “baiting”? How would the “fair-chase” zealots consider dove hunting in pea or lentil fields or over water holes, Ducks or Geese lured to human planted and cultivated corn, stubble or winter wheat fields?

Someday I will not be able to hike the miles. I feel fortunate because many my age already cannot hike, or climb trees, or are mesmerized by watching undisturbed Whitetail deer at close range. I love the solitude that Archery provides, in spite of the ever increasing numbers of Archery hunters. I am confident that I will find another Shangrila, or at least something close. I love to eat my well cared-for venison. I am against any changes to the current regulations in regard to “baiting” Deer or even the nomadic Elk. I missed the input meeting here in Spokane last summer. Ones I have been to in the past seem to be over-run with opinionated, bickering Rifle hunters looking to increase their seasons. I believe there are hundreds of solitary, introverted Archery hunters such as me who may use apples, corn, alfalfa, placed by their human hand, to enhance their experience of this quiet, solitary sport.

Once again, how different is this than hunting the apple trees or cultivated fields that are planted and cultivated also by human hand?

Please consider my opinion.

I am very much against using modern technology, like motion activated cameras, to hunt deer. Especially when combined with baiting which I am even more against.

I live in an area where most of the properties are 5 to 10 acres. Mine is 10, as is an adjacent property, on which there is no residence. Relatives of the owners use motion activated cameras, a tree stand and baiting to “hunt” deer. I don't think this is very sporting, as a matter of fact I think it is cowardly, and it especially doesn't seem to fit in an area with so many small tracts of property.

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

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I'm sure you have got all kinds of letter letting u know the benefits of baiting! From helping the wild life survive our hard winters in N.E. Washington to the devastating impact it will have on our rural areas farmers and small businesses. But I wasn't to let u know were I stand as a person I have been a hunter in our great state of Washington since I was 9 years old. I am now 48 I or my wife will not buy another license or tag in Washington if baiting and feeding of the big game is taken away from us this year.

The issue of using bait to hunt deer and elk is a topic that has been discussed in several of the last 3-yr. hunting season packages and it is being discussed again for the 2015-2017 hunting season package. We have heard from a wide variety of people with varying opinions on the topic of using bait to hunt deer and elk.

The on-line survey which was not a random sample of hunters, showed 63% of hunters in favor of baiting and 37% opposed to baiting for deer and elk, with those hunters preferring some level of restriction on the practice.

A random survey of hunters, conducted by a professional polling company, showed Deer Hunters were 59% opposed to baiting, 29% were neutral, and 12% supported baiting. The same survey of hunters reported that Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting.

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I have tried switching weapons and styles of hunting, but it is getting harder and harder to stay 
I myself am getting older and often have difficulty hiking the hills and getting away from the crowds. 
animal in rural/urban interfaces. 
are we going to keep the old timers buying licenses and more importantly, supporting WDFW? 
domestic cows does not constitute proper “Hunter Ethics”. The Fish and Game Commission states in 
baiting. These states have rich traditions of hunting western big game herds and baiting them like 
big game states such as Montana, Idaho, Wyoming, Colorado, Nevada, and New Mexico do not allow 
and low on fat. The outfitter we book with uses about 50 ton of foods for the wildlife each year 
outfitters.

So, what I’m trying to say: this will be the last year we make our trip to your state if your department 
principles of fair chase.”

Please reconsider the option of no baiting – you’ll do the animals a big favor!

I am opposed to banning baiting as a legal method of hunting. As someone who has bought a hunting 
license and hunted WA for 35 years, I hope my comments are considered. I have participated in deer 
drives, spot and stalk, still hunting, stand hunting and baiting. I can tell you that baiting for blacktails 
is hard work and does not guarantee a harvest.

The WDFW and Commission state that recruitment and retention are needed yet you are considering 
eliminating a tool that fits both those areas. Hunting from a blind over bait does not always mean 
success, but it does guarantee that a young hunter is side by side with a parent/guardian or mentor and 
it allows for selective harvest. It also allows the seniors and disabled get out and enjoy the outdoors 
with a chance at harvesting an animal even if they can’t keep up with the crowds hitting the hills. How 
are we going to keep the old timers buying licenses and more importantly, using WDFW?

Often baiting is the only way a hunter has a chance on small pieces of land. With private land access 
and with respect to the past and present lands overcrowded, baiting often the only way to safely harvest an 
animal in rural/urban interfaces.

I myself am getting older and often have difficulty hiking the hills and getting away from the crowds. I 
have tried switching weapons and styles of hunting, but it is getting harder and harder to stay 
engaged in hunting with WDFW changing the rules all the time.

Please accept my comments I understand they are 3hrs late.

In Okanogan County “baiting” deer has become a MAJOR problem. With the nature of the apple 
industry there is an endless supply of core apples that are being placed by hunters across the county for 
the sole purpose of killing deer. I don’t believe this is ethical. These “bait stations” are happening on 
both private and public lands mainly in November and December when does are looking for the last 
source of fresh food available before winter and the bucks are depleted from the rut. Other western 
big game states such as Montana, Idaho, Wyoming, Colorado, Nevada, and New Mexico do not allow 
baiting. These states have rich traditions of hunting western big game herds and baiting them like 
domestic cows does not constitute proper “Hunter Ethics”. The Fish and Game Commission states in 
their mission that “The Department shall promote high standards of hunter ethics and adoption of 
principles of fair chase.”
We do not allow baiting for bears, turkey, upland birds, and turkey so there is reason we should allow baiting for deer and elk.

Please consider banning the practice of baiting deer and elk.

Thank you.

Hello, my name is [redacted] and I am contacting the WDFW in regards to the 2015-2016 Game Management plan. In particular I am very concerned with Objective 6 in the draft. To be clear I am 100% opposed to any proposed ban on baiting for deer and elk.

If the concern on the manner of baiting for deer and elk has to do with the ethics of a clean and fair chase. The practice of baiting for such an animal gravitates the chances of a clear and humane shot from a known distance. The difference between baiting a deer and taking a 600 yard shot should not be looked at differently but rather as the aesthetics of how that hunter chooses to hunt. Very few decisions should be made on how someone decides to hunt for an animal besides hunter safety and the issue of killing the animal cleanly, quickly and humanely.

Looking at the proposed ban on baiting on a more personal matter, I have been an active sportsman since a teenager enjoying different activities such as fishing, bird hunting, and deer hunting all in Washington. In recent years since graduating from college and obtaining fulltime employment and providing for my family. I do not have as much time in the woods as I would like and once had. With that said I am allowed roughly 1 week for deer hunting that I choose to do in the late archery season on public land. I do not have the time to scout for weeks and prepare like some can to increase their chances of success. I use scouting and hunting as a way of scouting and hunting for that one week I have to try and provide for my family. In no way does it increase my chances of shooting a huge buck because anyone who has used this tactic knows there is a reason why they are so big and bait is not a way to kill a buck.

Unfortunately, if the proposed ban were to pass and baiting was taken away from hunters it would truly be a sad thing. I can honestly say I would stop purchasing hunting licenses and fishing licenses because I cannot support an organization that does not listen to hunting community and allow reasonable regulations. I believe this would also fall under objection of retention and recruitment of the sport. I know I would not be the only one that would stop hunting in Washington State and retention numbers would decline.

Thanks you for taking the time to read this and I hope you listen to the hunting community. Please stop turning hunters against one another and giving the general public an opinion when they have no experience in the sport. Hunting tradition is rich in my family and I truly hope that doesn’t come to an end because of the decisions of others.

I am opposed to banning baiting as a legal method of hunting. As someone who has bought a hunting license and hunted WA for 35 years, I hope my comments are considered. I have participated in deer drives, spot and stalk, still hunting, stand hunting and baiting. I can tell you that baiting for blacktails is hard work and does not guarantee a harvest.

The WDFW and Commission state that recruitment and retention are needed yet you are considering eliminating a tool that fits both those areas. Hunting from a blind over bait does not always mean success, but it does guarantee that a young hunter is safe by side with a parent/guardian or mentor and a good place for a reflective harvest. It also allows the seniors and disabled get out and enjoy the outdoors with a chance at harvesting an animal even if they can’t keep up with the crowds hitting the hills. How are we going to keep the old timers buying licenses and more importantly, supporting WDFW?

Often baiting is the only way a hunter has a chance on small pieces of land. With private land access a thing of the past and state lands evermore crowded, baiting often the only way to safely harvest an animal in rural/urban interfaces.

I myself am getting older and often difficulty hiking the hills and getting away from the crowds. I have tried switching weapons and styles of hunting, but it is getting harder and harder to stay engaged in hunting with WDFW changing the rules all the time.

This spring I put out a trailcam and apples in a small cut on public land. For 6 months I got pictures of 5 blacktail bucks several nights a week. Not once did I get pies in the day. I set up a blind, and later a tree stand for archery, but only does came in during the day. Several times I passed on the legal does in the hopes of a buck coming in. Just before rifle season I moved the blind farther back for my wife.

This was the first year that my wife took her rifle and drove to the woods by herself and walked to the blind overlooking a clear cut. Never in 20+ years has she done that. She sat 21 times and for a total of 78 hours of rifle season, mostly after work. Every couple of nights she would come in and she would be excited to watch but I know she would join him. She kept her engaged and enthusiastic about coming home from work and immediately heading to the blind. Finally on the 28th a small 2x2 3/4 came out during shooting hours and she was able to take him, but he never came to the apples that day. Even though she knew they were there, she actually walked past them while he was 30 yards beyond them.

The point is, my wife was able to have a focal point to help keep her from getting bored while sitting in the woods. Checking the camera every other day was exciting for her and kept her interested in hunting the area despite the brush pickers, illegal quad riders and nearly 2 dozen other hunters that were regularly hunting the area (including sitting right in front of her blind). But she was able to get out and hunt.

We also set up a blind, cam and apples in a cut for my brothers girlfriend. She just passed hunters education this year and had never been hunting or done much shooting before. One morning she had a spike and small two point eating during shooting hours, but with a little fog, bad eyes and a small fir tree in the way, she passed on the shot at 30 yards. It is never a slam dunk. She also put in a few hours a night for several nights a week and several hours in the mornings on the weekends. After two weeks she was able to harvest her very first deer.

Baiting did not pull the bucks out during daylight hours.

Baiting for my camera and for hunting gave me enough hope and information on the local deer to pass

Deer Hunters were 59% opposed to baiting, 20% were neutral, and 21% supported baiting. The same survey of hunters reported that Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting.

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Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

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I'd like to weigh in against a proposed ban on lead projectiles for hunting. While the lead shot ban for.

on legal deer and my tag went unnotched. If we could not bait I would have shot the first adult deer.

Baiting kept my wife interested in hunting at a time when we are considering not hunting any more.

Baiting helped hook a new hunter who will be supporting hunting rights and purchasing a license and

We need all the support and sales we can get and I am sure you will lose the older hunters sooner and

not look as many of the next generation by banning baiting for deer and elk.

Your recognition of alternative shot and ammunition components, such as non-toxic ammunition,

reinforces Washington Department of Fish and Wildlife Commission decisions over the past 14 years.

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varying opinions on the topic of using bait to hunt deer and elk.

A random survey of hunters, conducted by a professional polling company, showed that Elk Hunters were 68% opposed to baiting, 19% were neutral, and 14% supported baiting. The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting.

WDFW RESPONSE

WDFW is working on a voluntary and educational approach, as well as regulatory actions to eliminate lead poisoning in documented problem areas.

Baiting does not have a heritage or a long history in Washington State, let’s keep it that way. Let

hunters and non-hunters alike see that we recognize many of the negative impacts baiting can cause,

and that we value our wildlife in Washington as much as other states that have laws in place to keep

this from happening. Thank You.

Many unnatural and dangerous situations are also presenting themselves in Pend Oreille County and

cauing collisions between deer and elk as people are feeding them near roadways resulting in

property damage, injury, and death.

Baiting was the intention of baiting.

I have done hunts in the Salmo Priest Wilderness for 24 consecutive years now and are now seeing

baiting taking place in the form of salt, other mineral mixes, and alfalfa 4 miles (4 miles!) from

trailheads! I have watched this completely change animal use in drainages with both ungulates and

predatory animals. Deer, elk, woodland caribou, cougar, black bear, grizzly bear, wolves (as well as other animals) all frequent these licks and/or baits. This could spell trouble to any of the sensitive or endangered species that have historically been found in our state. In many cases I have pictures to back up what I am saying and have been communicating these issues with USFS Enforcement Officer Will Markwort, WDFW Officer Severin Erickson, WDFW Biologists Dana Base and Jill Zender and IDF&W Officer Rob Soumas. In one case Zender gave me the coordinates to a

-100’ by 50’ salt lick that can be seen on Google Earth that you can witness (as you roll back Google photos) develop in the last 4 years.

Objective E: Reduce the availability and use of lead ammunition where lead poisoning of wild birds is problematic.

PUBLIC COMMENT

I am concerned whenever politics creeps into science. I believe that this has happened with proposals to ban lead ammunition under the guise of reducing “toxicity”. In reality this is a means of back-door gun control attempts to create logistical and financial burdens on the lawful ownership of firearms and practice of hunting, shooting sports, and self-defense. Similarly, when people who don’t hunt, have never harvested their own food either from wild game, farm animals, or even from tilling the soil for themselves, weigh in on hunting tactics and strategies, that’s wildly inappropriate. The unfortunate “Disney-fication” of the public’s understanding of nature has led to people who think wild animals talk to each other, are misunderstood when trying to communicate with “ignorant” humans, and that humans are somehow separate from nature, “out” of nature. This is the case with people who have tried to ban hunting with bat, hunting with animals, or

hunting with technology.

All of our rules around hunting are designed to make us less effective at the very thing we’re talking about here: hunting. It is important to limit the over-harvesting of game by unethical people, so as to preserve it for the future. But while the challenge and excitement is an important factor of hunting in order to preserve the traditions and lessons learned from hunting, there is still the fact that the point of hunting is to take game. It is important that humans are part of the system of nature that maintains balance in nature; by predating upon prey animals, competing with other predators, and dynamically maintaining balance in our environment.

Please: no bans on lead ammo, and no further restrictions on hunting methods.

Hello commissioners,

I’d like to weigh in against a proposed ban on lead projectiles for hunting. While the lead shot ban for

wetfowl had a justification, I haven’t seen any substantial evidence of the same need with other

hunting applications, notably, rifle bullets.

Regards

Pitchfork Audubon Society of St. Johns County welcomes the work your team has done to listen to

the wide range of stakeholders interested in game management in Washington State. This letter comments upon the most recent version of the Supplemental EIS 2015-2021 Game Management Plan which recognizes where data of quality has been identified. It also acknowledges need for more data concerning the use of toxic ammunition in hunting of wild birds and mammals, and the adverse effects of toxic ammunition upon wildlife and possibly hunters.

Your recognition of alternative shot and ammunition components, such as non-toxic ammunition,

reinforces Washington Department of Fish and Wildlife Commission decisions over the past 14 years.

This proposed plan recognizes the benefits to continue regulation of lead shot and bullets. We thank

You for your support of this objective and strategies.
Our ideal situation with access on private land is that it be at no additional cost to the tax payer assistance be directly tied to free public access programs and increase WDFW access programs and increase WDFW access programs and increase ownership WDFW access programs and increase ownership WDFW access programs and increase ownership.

Further studies will support expansion of regulations requiring non-toxic ammunition, used both in hunting, and target practice where wild birds and mammals have access to discarded lead ammunition. We suggest expanding the regulation to include so-called “varmints” which includes nongame animals eaten by wild birds.

We support Objective 8 as stated in the proposal: “Reduce the availability and use of lead ammunition where lead poisoning of wild birds is problematic.” Your strategies to accomplish this are on the right track. Useful steps proposed include acquiring additional information about the uses of lead ammunition and non-toxic ammunition by Washington State hunters, and through surveys determine levels of knowledge among hunters and the general public about related issues. There is much anecdotal information out here, mixed with strongly held opinions on the related issues, but lacking best practice science.

Your proposal “… to develop voluntary programs to encourage hunters to utilize lead alternatives” recognizes current resistance to regulatory routes. Using new outreach education programs aimed at hunters, to help them understand the issues and to gain their support for non-toxic alternatives, probably will be somewhat successful over time. It will not be nearly as quickly as we “birders” would prefer in phasing out toxic ammunition in hunting.

Birders will benefit in learning what the issues are for hunters such as availability of non-toxic ammunition supplies of the popular types of shot and bullets, and the costs of same compared to what is now in the marketplace. We presume that as availability of non-toxic ammunition expands along with use, costs will decrease for the alternative ammunition.

Most birders don’t know how compatible non-toxic ammunition is with older types of firearms which perhaps is knowledge also lacking in some hunters.

Pilchuck Audubon Society is concerned about how successful the Commission and WDFW will be in gaining both executive and legislative support to fund the proposed surveys and program development. Those are both places where opponents to expanding use of non-toxic ammunition even on a voluntary basis are likely to oppose.

Pilchuck Audubon Society members look forward to helping the Commission and WDFW gain needed appropriations and other funding, to achieve Objective 8, using at minimum the strategies given in your six-year plan.

Objective 16: Complete additional coordinated tribal/state harvest management plans for species such as deer, elk, mountain goat, bighorns, and/or cougars populations subject to both tribal and non-tribal hunting.

Non-toxic Ammunition

The language in the latest version of the GMP regarding lead ammunition continues to be weak. There are decades of science supporting prohibiting the use of lead shot due to lead poisoning of many birds of prey and non-target mammals, possibly including wolves, a state and federal endangered species in most of our state. We suggest that one of the strategies is to eliminate the use of lead shot within 3 years, utilizing the outreach programs listed as strategies. We also believe that the WDFW should absolutely not use lead shot in any of its activities, period. Prohibiting the use of lead shot is far past due in Washington given the evidence that many of our species, including species of concern such as golden eagles, are suffering from lead shot use.

In many situations, lead has not been shown to be problematic in terms of causing declines in wildlife at a population level. However, there are some specific situations where it is problematic such as with condors and other birds of prey. But there are also many issues with the availability, cost, and use of non-lead alternatives. The Department thinks that our objectives and strategies are appropriate for the term of this plan.

PUBLIC COMMENT

Thank you for the opportunity to comment on the SEIS for the 2015-2021 Game Management Plan (the GMP) dated October 17, 2014.

In developing the GMP the Department did not engage the Squaxin Island Tribe in its planning, did not comply with the Commission Policy Decision C-3607, or effectively or adequately incorporate treaty hunting needs in its planning. The Department should engage affected treaty tribes prior to presenting the GMP to the Commission for review and approval.

The Squaxin Island Tribe submitted the following comment:

Thank you for the opportunity to comment on the SEIS for the 2015-2021 Game Management Plan (the GMP) dated October 17, 2014.

In developing the GMP the Department did not engage the Squaxin Island Tribe in its planning, did not comply with the Commission Policy Decision C-3607, or effectively or adequately incorporate treaty hunting needs in its planning. The Department should engage affected treaty tribes prior to presenting the GMP to the Commission for review and approval.

The Department send out a letter dated June 2017 informing tribes of the Game Management Plan process and contact information if the tribes were interested in discussions. In addition, we send SEPA notices in August and again in October when the Plan was available for comments. We have received comments from several tribes and this comment from yours. We highly value your thoughts and concerns and encourage you to contact our Regional Wildlife Program Manager Mick Cope to address your concerns.

The Department send out a letter dated June 2017 informing tribes of the Game Management Plan process and contact information if the tribes were interested in discussions. In addition, we send SEPA notices in August and again in October when the Plan was available for comments. We have received comments from several tribes and this comment from yours. We highly value your thoughts and concerns and encourage you to contact our Regional Wildlife Program Manager Russ Link to address your concerns.

Objective 14: Maintain a strong team of thirteen private lands biologists statewide to assist landowners with habitat enhancements and provide recreational access. Utilize Farm Bill and state fund sources to enhance habitat under a minimum of 400 landowner agreements by 2021. Submit at least one proposal for permanent additional funding for habitat and access incentives.

Objective 16: Continue to utilize available resources and foster the development of new incentives to increase landowner participation in WDFW access programs and increase acreage enrolled to 3.3 million acres.

PUBLIC COMMENT

Page 33

Excerpt -- Hunter Access -- It states that “WDFW has also conducted surveys of landowners and hunters to help identify concerns and set priorities for the program. In 2013, program staff began an inventory of private industrial timberland that was in fee access programs in western Washington. Based on this inventory, WDFW anticipates that at least a quarter of the state’s private industrial timberland could be income type of landowner fee permit system by the 2014 hunting season.”

Comment – SCL was not contacted for this survey even though it owns more than 12,000 acres of land open to hunters. The continued reduction in acreage of private land open to public and tribal hunting means that hunters will increasingly seek out the SCL wildlife conservation lands in the Pend Oreille and Skagit Counties for hunting opportunities. We are concerned that this increase could lead to habitat degradation and increased management costs related to recreational use of its land. SCL suggests that WDFW contact all landowners and public land managers during the planning process.

The surveys referenced involved random samples of large and small landowners. Although they did not reach all landowners we do feel that they were successful in identifying and documenting the major issues which was the goal. Limiting the sample size is an issue of cost effectiveness.

Increased use of other lands is also one of our key concerns which could lead to further restrictions. This snowball effect has been a concern of other landowners we have talked to.

The key objective of our hunting access program is to mitigate the costs that landowners incur when allowing the public on their land. We will be asking one of our Private Lands Biologists to contact you in the near future to explore ways that we might assist public access.

WDFW RESPONSE

The Department send out a letter dated June 2017 informing tribes of the Game Management Plan process and contact information if the tribes were interested in discussions. In addition, we send SEPA notices in August and again in October when the Plan was available for comments. We have received comments from several tribes and this comment from yours. We highly value your thoughts and concerns and encourage you to contact our Regional Wildlife Program Manager Mick Cope to address your concerns.

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Our ideal situation with access on private land is that it be at no additional cost to the landowner. Secondly, we may work with and encourage landowners to keep any fees low and affordable. The answer to whether a high number of permitted users at a low permit cost is better than a high permit fee with very limited numbers of permits in...
NGOs to oversee implementation of SCL’s FERC license Settlement Agreements, so that might Management Review Committee (WMRC) that work with SCL and other agencies, tribes and Terrestrial Resources Working Group (TRWG) and Skagit River Hydroelectric Project Wildlife elk damage control or for predator control actions. WDFW has representation on the Boundary WDFW should include SCL as it does other private stakeholders when planning hunting seasons of private companies [or landowners]. In effect, the loss of use of private timberlands, coupled with noted, “as timberlands are gated, public land often becomes landlocked and inaccessible by the actions http://scorpwa.files.wordpress.com/2013/05/final-wa-scorp-full-report-5-7-2013.pdf funds. Any improvement that access landlocked state lands for trail users also provides access for guidelines that prioritize acquiring access and easements have been suggested, especially for NOVA improvement that access landlocked state lands for trail users also provides access for hunts. Here is a passage from the SCORP that deal with loss of access to timberland. “As some of the Town Hall contributors suggested, some of the state’s best efforts to increase recreation opportunities may have backfired. For example, the state’s Open Space Taxation Act, enacted in 1970, allows for current use assessment, which values property at its current use rather than its highest and best use. This offers incentives to landowners whose properties qualify as one of the following designations: open space land, farm and agricultural land, or timberland. One of the many qualifying factors for classification is enhancing recreation opportunities. In other words, among its many advantages, the Open Space Taxation Act encourages increases in recreation lands. However, an unnoticed by some of the SCORP Town Hall contributors, there is a trend in private land ownership to limit public recreational access to no-entry or to a pay-to-enter model. This occurs despite the fact that similar taxation acts were enacted to encourage public recreation on these lands. As one contributor noted, “as timberlands are gated, public land often becomes landlocked and inaccessible by the actions of private companies [or landowners]. In effect, the loss of use of private timberlands, coupled with landlocked public lands has drastically reduced the ‘recreational’ availability to public in the last 10-15 years.” It is impossible for WDFW to engage every landowner or stakeholder individually. While there are components of this chapter that deal with gaining or improving access to public lands, they deal primarily with issues of these lands being landlocked by private ownerships. We understand your point but feel that the current chapter name is appropriate. WDFW has representatives on and will continue to participate in RCO planning efforts and the Governor’s Blue Ribbon Panel. We do look for opportunities to partner with other efforts. On this point we do feel that this should be noted in the plan and a strategy has been added to reflect this. WDFW continues to see reduced private land open to public hunting, particularly lands that do not require payment to the landowner (“feel free to hunt”). Many lands are being closed by private landowners or timber companies or are only open for hunting with registration and/or payments. This trend could result in increased hunting pressure on SCL lands. This is especially true because these same areas are used by tribal hunters as well as WDFW-regulated hunters. WDFW’s strategy to address reduced hunting area in the State of Washington includes developing cooperative agreements with private landowners to keep lands open to hunting. WDFW should include SCL as it does other private stakeholders when planning hunting seasons and regulations, or habitat management actions in areas with SCL property, especially when WDFW proposes to change season dates or number of tags. Similarly, SCL should be included with other stakeholders when WDFW reaches out to plan special hunts for deer, black bear, elk and damage control or for predator control action plans. WDFW has representation on the Boundary Terrestrial Resources Working Group (TRWG) and Skagit River Hydroelectric Project Wildlife Management Review Committee (WMDRC) that work with SCL and other agencies, tribes and NGOs to oversee implementation of SCL’s FERC license Settlement Agreements, so that might be one venue to have such discussions. WDFW should be willing to play a lead role in assessing terms of providing recreational access is obviously yes. We have modified the language in the strategy but not to a point as strong as you suggested. It is currently unclear whether free access can be required in order to receive hunting access with regard to bear damage. There is also a balance in that if a landowner felt that requirements were not suitable they could revert to using contractors instead of general hunters to manage tree damage. Acknowledging that there is a subset of hunters who are willing to pay fees, this option that landowners have would result in less hunting opportunity available. WDFW’s Enforcement Program does have contracts with timber companies to assist with managing the public and protecting fish and wildlife. In most of these contract agreements officer time, vehicle mileage, and equipment costs are paid for by the private timber companies and do not effect regularly scheduled duties. These contracts provide our officers with the ability to access large tracts of private land, thereby making it possible to enforce fish and wildlife laws. It is not uncommon for WDFW Officers to enforce state law on private lands that are not open access to all state hunters and fishers. It is likely that many fish and wildlife violations would go unnoticed if our officers were unable to access these lands as part of the contractual agreement. There is the potential to leverage these services to improve or increase hunting opportunity. WDFW will be exploring these options prior to renewing existing contracts or entertaining future ones. ADD NEW OBJECTIVE in Private lands Hunting Access (perhaps rename chapter to HUNTING ACCESS) A new objective needs to be added that considers hunting access as a “subset of recreational access in general. Wording such as “review state and national outdoor recreation programs and identify ways to incorporate hunting access into those current processes.” “Access is one of the major emerging issues in outdoor recreation in general, and the WDFW plan should investigate and “piggyback” on existing plans. At a minimum a general “plan review” is needed and could be added to this chapter rather easily. For example: the new SCORP (state comprehensive outdoor recreation plan) talks about land access for recreation as one of the big issues for the future, but this wildlife plan does not consider the SCORP. The state also has a new NOVA plan and trails plan. These documents are mostly online on the RCO website. Objectives and goals from these existing and adopted plans should be reviewed for relevance to hunting access” and those objectives added to this wildlife plan. The governor’s “Blue Ribbon Panel on Outdoor Recreation” also just released its findings and recommendations. New RCO guidelines that prioritize acquiring access and easements have been suggested, especially for NOVA lands. Any improvement that access landlocked state lands for trail users also provides access for hunters. WDFW has placed considerable emphasis over the years on obtaining access to private lands, they deal primarily with issues of these lands being landlocked by private ownerships. We understand your point but feel that the current chapter name is appropriate. WDFW has representatives on and will continue to participate in RCO planning efforts and the Governor’s Blue Ribbon Panel. We do look for opportunities to partner with other efforts. On this point we do feel that this should be noted in the plan and a strategy has been added to reflect this. WDFW continues to see reduced private land open to public hunting, particularly lands that do not require payment to the landowner (“feel free to hunt”). Many lands are being closed by private landowners or timber companies or are only open for hunting with registration and/or payments. This trend could result in increased hunting pressure on SCL lands. This is especially true because these same areas are used by tribal hunters as well as WDFW-regulated hunters. WDFW’s strategy to address reduced hunting area in the State of Washington includes developing cooperative agreements with private landowners to keep lands open to hunting. WDFW should include SCL as it does other private stakeholders when planning hunting seasons and regulations, or habitat management actions in areas with SCL property, especially when WDFW proposes to change season dates or number of tags. Similarly, SCL should be included with other stakeholders when WDFW reaches out to plan special hunts for deer, black bear, elk and damage control or for predator control action plans. WDFW has representation on the Boundary Terrestrial Resources Working Group (TRWG) and Skagit River Hydroelectric Project Wildlife Management Review Committee (WMDRC) that work with SCL and other agencies, tribes and NGOs to oversee implementation of SCL’s FERC license Settlement Agreements, so that might be one venue to have such discussions. Page 4 Excerpt - WDFW has placed considerable emphasis over the year on obtaining access to lands for the enjoyment of hunting. Currently, there are several programs promoting hunter access to lands. For decades the WDFW Private Lands Program has provided incentives to private landowners through technical assistance, implementation of habitat enhancement strategies, and hunter management assistance. Landowners agree to open their lands for recreational opportunity in exchange for materials and help planting and developing habitat. Over the past decade WDFW has also begun to offer cash incentives on either open-acre or per-acre site basis in limited high priority focus areas where access has been difficult to secure. The Department provides free signs and assist the landowner in posting their lands as “feel free to hunt.”* “register to hunt,” “Hunt by reservation only,” “Hunt by reservation only.” The “register to hunt” is the new option and was first used in 2013 to provide greater hunting opportunities and give landowners another option to meet their needs. There are over 1 million acres and over 500 landowners in Washington under cooperative agreement. Comment – This applies to private land. What about municipality-owned land? With representatives on our committees, WDFW should be willing to play a lead role in assessing...
Comment — Good to see is included since SCL lands are open for recreational activities.

Objective 17: Complete an inventory of public lands by 2016. Evaluate situations where access is closed, impaired or at risk of closure by private landowners, identify opportunities or obstacles to making changes, and develop a strategy to address these issues.

PUBLIC COMMENT

WDFW RESPONSE

Objective 20: Respond to wildlife damage complaints to private agricultural crop lands within 72 hours, and increase the number of WDFW agreements used to mitigate deer and elk damage by 10% during the period 2015-2021.

PUBLIC COMMENT

WDFW RESPONSE

Objective 21: Maintain or decrease livestock depredation levels over the period 2015-2021.

PUBLIC COMMENT

WDFW RESPONSE

Objective 23: Make improvements to WDFW’s black bear tree damage program which will result in a 10% reduction in the number of permits requested to lethally remove black bears for timber damage while maintaining or decreasing the amount of bear caused timber damage over the period of 2015-2021.

PUBLIC COMMENT

WDFW RESPONSE

Objective 31: Continue to monitor elk populations annually to determine whether they are consistent with Tables 1 and 2. Exceptions will sometimes be made when WDFW is dealing with chronic wildlife conflict issues involving elk.

PUBLIC COMMENT

WDFW RESPONSE

Objective 50: Continue and expand the current white-tailed deer research.

PUBLIC COMMENT

WDFW RESPONSE
Restricting buck harvest to only animals with a certain antler configuration was proposed and put into place with the hopes of increasing the herd and buck size in these units. The thought is that by only focusing efforts on older deer, more yearling bucks will survive and grow to older ages and produce larger antlers and increase the numbers of older bucks.

The studies I have seen do not show me that the herd has improved due to a 4pt restriction in these two units. As with the first studies that were done, there is no science to show the need for antler restriction in this area. With several mild winters the deer populations have exploded. The results I do see is that this antler restriction is simply unhealthy for the sport of hunting in general.

Hunters feel that the size of a buck’s rack has become far too important in recent years. In addition, they believe that such regulations and restrictions are unfair for those who have limited time to spend in the field each season. These hunters stress that antler-restrictions can be the difference between harvesting a deer and going home empty handed. At a time when the Game Department is working to increase hunter participation, this restriction is having the opposite effect.

Business in Colville is also feeling the results of this restriction. Hunting participation in that area has dropped dramatically. And in doing so has had a huge effect on local vendors in the area.

The Inland Northwest Wildlife Council does not support this restriction. I would ask that you reconsider removing the 4pt restriction in unit 117 & 121 taking in the lack of evidence that it has been successful or necessary, and has only caused a decline in the participation of hunters and hurt the community.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

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The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

The studies we have participated in have not shown us reasonable positive results to agree with the restriction and for it to remain in place. We would ask the commission to consider removing the restriction that is currently in place for these units.

The INWC does not support the 4 pt antler restrictions.

Why does gm 117 require at least 4pt buck when all other gm in eastern washington only require any deer or any buck? this should be revised to include gm 117 as any buck or deer; also why cant seniors have more then 4 days to hunt for antlerless deer it should go for whole season, thank you looking back the law for gm 117 was changed a few (3 or 4) for some reason.

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

I hunted the Chewelah Colville area. I saw 62 bucks during hunting season, approx.. 30 were 3 pts., 20 had 4 pt. spikes, 7 were 4 pts., 3 were 5 pts.. And 2 were over 5 pts. The 4 pt. minimum has done wonders for Stevens county hunting. Please keep the 4 pt. minimum. Advertise the quality of the hunt and bring up the hunters to fill hotels, motels, restaurants. Many bears, cougars, and wolves, all of which should allow hunting to hunt. We need to promote hunting, for all age groups, on state and federal lands.

Your comment is related to the hunting season setting process which is separate from the process of developing the Game Management Plan.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

Objective 90: Develop programs with informational materials to help timber owners with: validating and anticipating bear damage; use of non-lethal methods to avoid damage; and lethal removal options. Develop a minimum of one of these programs each year beginning in 2015.

PUBLIC COMMENT

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

Objective 90: This objective is about BEARS and TIMBER DAMAGE; yet when I go to public comments (Appendix B) to find department responses all I can find (?) are comments/responses about Cougars? Am I blind or is the numbering system mixed up? Was this objective modified in response to what public comments?

As we revise the Game Management Plan objective numbers change. This was originally Objective 86, and changed to Objective 90 in this version.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

Objective 125: Continue to focus enhancement efforts in the pheasant focus area. Work with and/or provide incentives to private landowners to enhance a minimum of 5,000 acres of habitat especially for nesting and brood rearing. Maintain existing agreements that foster quality habitat.

THE WDFW RESPONSE

We are pleased that you have seen improvement. We agree that lands in the Fee to Hunt program have the greatest potential to maximize user days. Some landowners however, have concerns that cause them to be reluctant to allow access on a basis that is this open. The Hunt by Reservation program was created to provide more control by the landowner but on a less restrictive basis for the hunter. Fee to Hunt will continue to be our preferred option wherever feasible.

WDFW does fund or assists landowners in obtaining funding for habitat enhancements such as you describe and will continue to do so. We also support efforts by pheasants forever and others to improve habitat. These groups can sometimes be more successful in working with landowners who otherwise may be reluctant to work with a government agency.

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Thank you for your participation. WDFW respectfully disagrees with your assessment of hunting.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.

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The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting. We encourage you to stay engaged on these topics and participate at the March Commission meeting.
I am an archery hunter. I would like to see the archery season moved to later in September for the following reasons:

1. It is usually so hot the first 10 days of the season, if you were lucky enough to get an animal, the meat would probably spoil before getting it out of the woods.
2. There have been several times that I have encountered people vacationing in the woods and I am in camp hunting. I have scared them half to death, they did not know that there was any hunting going on.

I would also like to see GMU 328 remove the true spike requirement. I have heard of several times in archery and modern rifle that an animal was shot thinking it was a true spike. However once it was down it really was not a true spike, so the animal was left. That is such a waist of an animal because of the regulation.

Thank you for your comment.

Here is my comment submission in response to the revised draft of the WDFW Game Management Plan:

The permitting process for non-lethal options for nuisance beaver management, as it stands now, remains more than insurmountable in eastern Washington and certainly ineffective in reaching timely solutions for an average citizen. I’ve been through the process, or attempted it, numerous occasions over the past three years. System failures have occurred at multiple levels, while the permitting is granted inconsistently. (i.e. Some regional agencies are approved in a sort of general HPA permit, with preapproval for nuisance management using lethal options, etc.) I’ve never been able to access such a permit for non-lethal options, despite my inquiries). Of perhaps a greater concern, connectivity and buy-in within the agency is also proving to be a significant struggle in eastern Washington. In certain cases, key figures within WDFW evidently are either unaware of the supporting mandates and available resources (RCW 77.32.585, http://wdfw.wa.gov/living/beavers.html) or unwilling to route concerns to available, documented, beaver translocation and other non-lethal resolution resources. We need to streamline or eliminate the permitting and approval process to allow immediate, non-lethal solutions of standard designs sanctioned by WDFW. As a start, eliminate the approximate 1500 fee for the Hydraulic Project Approval (HPA) permitting process, added in 2014. There is no credible premise for this expense, and it should not be the duty of the property owner with nuisance wildlife concerns. Additionally, a simple checklist procedure should be implemented and documented within the agency, showing criteria utilizing non-lethal options, prior to approving lethal options.

On the document sent the time says 6pm, but this document was sent at 5pm which meets the deadline; my computer has the correct time but yours has not been adjusted to daylight savings time.

Thank you for the heads-up.

Thank you for your participation.

Nothing is as it was in the 1950s. That includes the human population and the amount of wildlife habitat left in Washington state. Several of the suggestions you are making have been shown by researchers to be unsustainable because of the costs and have shown limited results at best. Some of your other suggestions are in direct conflict with federal law.

WDFW does its best to provide general season opportunity to all user groups, while still meeting post-hunt population objectives for the wildlife resource. As you start to show numbers at the March Commission meeting and then will make a rule decision at the April Commission meeting.

The Fish and Wildlife Commission will hear a briefing and public testimony at the March Commission meeting and then will make a rule decision at the April Commission meeting.

The permitting process for non-lethal options for nuisance beaver management, as it stands now, remains more than insurmountable in eastern Washington and certainly ineffective in reaching timely solutions for an average citizen. I’ve been through the process, or attempted it, numerous occasions over the past three years. System failures have occurred at multiple levels, while the permitting is granted inconsistently. (i.e. Some regional agencies are approved in a sort of general HPA permit, with preapproval for nuisance management using lethal options, etc.) I’ve never been able to access such a permit for non-lethal options, despite my inquiries). Of perhaps a greater concern, connectivity and buy-in within the agency is also proving to be a significant struggle in eastern Washington. In certain cases, key figures within WDFW evidently are either unaware of the supporting mandates and available resources (RCW 77.32.585, http://wdfw.wa.gov/living/beavers.html) or unwilling to route concerns to available, documented, beaver translocation and other non-lethal resolution resources. We need to streamline or eliminate the permitting and approval process to allow immediate, non-lethal solutions of standard designs sanctioned by WDFW. As a start, eliminate the approximate 1500 fee for the Hydraulic Project Approval (HPA) permitting process, added in 2014. There is no credible premise for this expense, and it should not be the duty of the property owner with nuisance wildlife concerns. Additionally, a simple checklist procedure should be implemented and documented within the agency, showing criteria utilizing non-lethal options, prior to approving lethal options.

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Thank you for the heads-up.