Comment: I am curious about how game cameras can fit into animal conservation? I am a hunter and used to be an AZ licensed hunting guide. I see the latest round of technology lets the hunter sync his game camera with his cell phone through an app and watch live from any location. To me this is no difference than using an airplane or drone to locate animals. I realize also that when every tank trick or not has a dozen cameras on it seems the odds are in favor of the techno guide not the wildlife. When unit 9 is under a severe drought which is most of the time animals are forced to water in front of 15 cameras and four game blinds. We might as well go back to hunting these animals like we used to hunt buffalo on the plateau. Let's outlaw cameras within a half mile from water holes. Put a limit on the number an individual can use have a registration number on each camera, Pay game and fish for a permit for every camera. Let's bring hunting back to hunting!

**Department Response**: The Commission recently approved some restrictions on the use of "live-action" trail cameras, cameras that can transmit the images without you being present. This rule became effective on June 1, 2019. Below is the specific rule language. No restrictions on the placement or quantity of other types of trail cameras were approved. I have copied our rulemaking section on this email so your suggestion will be captured and considered during the next review of these rules.

## *R12-4-301*. *Definitions*

"Live-action trail camera" means an unmanned device capable of transmitting images, still photographs, video, or satellite imagery, wirelessly to a remote device such as but not limited to a computer, smart phone, or tablet. This does not include a trail camera that only records photographic or video data and stores the data for later use, provided the device is not capable of transmitting data wirelessly."

## R12-4-303. Unlawful Devices, Methods, and Ammunition

- A. In addition to the prohibitions prescribed under A.R.S. §§ 17-301 and 17-309, the following devices, methods, and ammunition are unlawful for taking wildlife in this state:
- 5. A person shall not use a live-action trail camera, or images from a live-action trail camera, for the purpose of:
- a. Taking or aiding in the take of wildlife, or
- b. Locating wildlife for the purpose of taking or aiding in the take of wildlife.
- 6. A person shall not use images of wildlife produced or transmitted from a satellite or other device that orbits the earth for the purpose of:
- a. Taking or aiding in the take of wildlife, or
- b. Locating wildlife for the purpose of taking or aiding in the take of wildlife.
- c. This subsection does not prohibit the use of mapping systems or programs.

**Comment:** Would it be possible to give points for Sandhill Crane if not drawn? Since the Sandhill draw is now online it will be harder to get drawn. Like once Pheasant went online we never got drawn again and we use to get drawn at least once every 3 years. Now Pheasant is no longer a draw but we feel Sandhill Crane will end up the same way and hard to get drawn without points. Plus, it is under big game draw and you should get points. No one in any of our parties got drawn for Sandhill this year which was never the case with mail in. Thanks for the consideration

**Department Response**: I am sorry to hear that you did not draw a crane permit. Your suggestion would require a change to the Rule that governs bonus points. I have forwarded your suggestion to our Rulemaking section for consideration during the Rules next review. Best of luck on future draws.

Comment: 1). We need to immediately stop the hunting of elk during July and August. Regions are using this money to supplement and manage their budgets. Elk do not cause that much damage to farmers hay fields, and to ranchers via loss of grass. Ranchers and farmers can be compensated by the RMEF and AES and public if they feel that they have suffered crop damage etc. Hunting, Chasing, and Harassing elk around that have young spotted calves is a travesty, and something that is not done anywhere else in the U.S. for any other game animal. We don't hunt lions with spotted kittens why in the world would we want to manage elk this way? Stop it now. The 20 year old policy, of population management via the depredation hunts started by Brian Wakeling needs to go away.

- 2). Also sheep populations need to be closely evaluated every year and surveys done annually. Years ago Management policies for sheep were set up so our biologists could react and account for changes to a population quickly, to wait an extra year, or every three years to evaluate sheep populations in a unit is not right. Example is the Silverbells, this year we have at least 47 class 3 and 4 rams available in unit 37a, people criticized me for wanting another hunt and an extra 2 tags in there. We have a problem of overpopulation in the Silverbells and if we don't move some sheep around a die off can occur because of stress, we have documented this in the past, when sheep get overcrowded and stressed, especially during the rut.
- 3). Coues deer archery hunters need to apply via permit system, and choose either rifle or bow. And at least one of the general hunts for Coues needs to go away, and the permits made up and added to the other 3 general seasons per unit. We need to give the deer a break, in between hunts.
- 4). Every unit in the state that has an antelope herd needs to have an aerial gunning program in place and implemented to reduce coyote populations. Especially late in the spring, and early summer when antelope are having fawns. Arizona's antelope population is a big joke among the other western states. We have a chance to produce the best bucks around, but we don't care and haven't cared about our antelope for a couple of decades now.

Department Response: Thank you for providing your views. I will address each of your 4 comments in order. 1) The Population Management Hunt (PMH) approach is designed to address conflicts between wildlife and private landowners or other uses of the land. PMHs are implement to achieve additional harvest and disturbance of the animals when traditional hunt strategies are ineffective. PMHs are implemented very conservatively with low numbers of permits. Overall harvest from these hunts is very low. Disturbing the animals so they leave the area where the conflict is occurring is the primary goal. The Department does not implement these hunts for the revenue generated. PMHs are just one tool the Department has to address human-wildlife conflict issues and it is typically employed after other approaches have been exhausted. 2) When the Department shifted to surveying bighorn sheep units every third year rather than annually or bi-annually, we looked a past data as well as changes in hunt permittags from year to year. The annual changes in hunt permittags was very minimal. We are able to manage for sustainable bighorn sheep populations by surveying every 3 years. In areas, like the Silver Bell Mountains, where the bighorn population is very robust, our wildlife managers

to keep tabs on the populations through ground patrols, conversations with hunters and other sportsmen, observations during other aerial surveys, and camera data at water sources. If concerns arise from these information sources, the Department has conducted helicopter surveys more frequent than the 3 year cycle. Robust populations are used as sources for translocations; population surveys are conducted more frequently when an area is used as a source population. 3) We will consider your suggestion during the next hunt guidelines review. 4) Your suggestion would be the ideal situation; however, it is not fiscally possible for the Department to implement. I believe many would say that Arizona already produces some of the best bucks around.

**Comment:** Two years ago I addressed the attached letter to G & F addressing the tag numbers issued for hunts in the 12aw Kaibab unit. This unit along with other hunt units have tag numbers issued in the 500 plus numbers. The number of tags greatly effects the quality of hunts, especially for beginner hunters. My suggestion/ question, especially pertaining to Kaibab is: Why not split the hunt into two separate hunts. Make the hunt 7 days with 250 tags, instead of 500 tags for 14 days. In my opinion this would make for a better quality and safer hunt.

I am addressing this letter to express my disgust and disappointment with a recent hunt which I took my wife on in the early Kaibab rifle hunt. This was one of her first rifle hunts, and maybe her last. This hunt ran from 10/26-11/4, and had 500 tags. I have discussed this hunt with friends and on social media, and it appears that I am not the only one that feels this way. Although I probably should have known that with 500 tags it would be a bit crowded, but I figured that the Kaibab is a big area and could handle the pressure, not realizing that the majority of hunters would be compressed into the burn areas. Let me give you a brief synopsis of how our hunt went. In the first few days of the hunt we had bullets blow by us, one was close enough that I heard the bullet come by before the report of the rifle. I had my wife within 100 yards of one deer and another hunter shot it from 150 yards away. The next afternoon a hunter shot another deer that had come out from some trees 50 yards behind us. That hunter was 200 yards above us, and yes they both knew we were there. Every morning hunters were racing by you to get to a glassing location before anyone else got there. For the first four days of the hunt it was like a war. By the fourth day of the hunt my wife wanted to go home. She didn't admit it, but she was scared and definitely disappointed. I talked her into staying a couple more days, but by that time the bucks had gone nocturnal. A few days before the hunt was to end, my wife said she was done and we came home. I said in the beginning that I was disgusted and disappointed. The disgust came from the fact that the animals had very little chance to survive. This isn't hunting, this is a shooting gallery. The disappointment comes because I took a person that was new to rifle hunting and came back with that person saying they never want to do it again. I'm sure that G&F is completely aware of this situation. But something needs to be addressed about it before someone gets wounded or worse. If the G&F studies show that the area can handle 500 tags, then why not split the hunt into two hunts, an early and late hunt, with 250 tags per hunt. In my opinion this would create a more quality hunt. I know G&F has budgetary concerns, and it would cost more to have personal in the area for an extended period of time, but I will say it again, it would create a more quality hunt. I'll add one more thing before closing; G&F is continuously pushing for experienced hunters to mentor young hunters, and new hunters. G&F wants new hunters in the field. It not only generates more revenue, but continues the hunting heritage. Hunts like this do exactly the opposite.

Department Response: Thank you for providing your views on the Unit 12A hunt. In the past, hunters as a whole have been supportive of 10-day that allows for more hunt permit-tags to be issued. When you stratify a hunt into two 7-day hunts, you create two opening weekends which results in higher overall harvest. If population parameters such as the buck to doe ratio and fawn recruitment don't indicate that additional harvest can be supported, then a permit reduction would be necessary, losing hunter opportunity. Unit 12A offers two types of hunt opportunity: the early season which allows for a better chance of drawing a permit but may have more hunters in the field and lower hunt success and the late season which gets more towards the quality hunt experience that you have described but is difficult to draw. I will share your comment with the Wildlife Manager for Unit 12A and keep it on file for the next hunt guidelines review.

**Comment:** I would like to see low desert rifle hunts start mid-November for 2 weeks. And muzzle loader deer start Dec. 1 thru 31. With 75 tags.

**Department Response**: We will consider your suggestion when we begin the next cycle of deer hunt recommendations.

**Comment:** Every country needs immigration, but, not illegal immigration and that we have in AZ., as is well known by you and everyone else.

This presents many problems, one of which is that illegals are being allowed to obtain hunt permits and put in for the lotteries for hunting. Political attempts to stop this have been met with screaming of racism etc., and AzGF does not seem to be able to stop it as well. It needs to be corrected. How many of us citizens are being denied hunting tags due to this problem. I have no ideas, but, I would estimate it's high, how's 1 to 2 thousand sound for conservative estimate? I appreciate the effort made for game management, I support hunting and safety. It would be great to stand a fair shot at hunting, all of you and your family and friends are affected as well. The only solution I see is to approach the Governor and the Legislature, but, the approach will only work if there is an attitude to win, by the Gov., the Legislature and us, perhaps a online petition to start. Thanks for your time.

**Department Response**: We do our best to determine if an applicant can legally apply. A social security number is required when applying; although we know this does not prevent all from applying.

**Comment:** With the exception of Deer Archery why not consider like Colorado that once the season starts Tags like Bear and Mountain Lion even turkey cannot be purchased top avoid someone first shooting the animal then getting tag. A tag can be purchased after but only at game and fish locations only. Thank You

**Department Response**: I appreciate you commenting. We had a similar rule at one time (more than a decade ago) but it was removed as being too restrictive. I will share your comment with our Rulemaking section to be considered during the next review of our Article 3 rules.

**Comment:** I still am looking for a combination deer and elk hunt in the northern half of the state. While I know the herds are low because of the drought, it would be a good hunt. Please think about it. Thanks

**Department Response**: We will consider your suggestion. It is a challenging concept in that demand for both deer and elk hunts is very high in most northern units.

**Comment:** Why can't you move the dear hunt draw right after the elk draw. The reason I'm asking is by the time I get my tag for archery in the mail it's almost a day or two before I leave to hunt and I feel it's just cutting it to close. In fact 1 year when I was drawn for the Kaibab I had to stop by AZGF and get a duplicate tag because mine did not arrive before I left.

**Department Response**: Timing of the hunt recommendations is set to occur after the population surveys are completed; surveys are completed by mid-February. These data are very important when setting permit levels. Moving the draw early in the year would affect our ability to use these data. However, with the application process moving to online only, this may allow us to run the draw earlier in July.

**Comment**: I'm highly disappointed that game and fish will be performing maintenance immediately prior to and possibly during the fall hunts in unit 9. It is hard enough to draw this tag let alone be subjected to ruined hunts and scouting efforts by not only greedy guides and hunters but also game and fish maintenance crew's poor planning. The money for this comes from us, the hunters. Why ruin it?

**Department Response**: I am unaware of the project you are speaking about. The Department may be doing maintenance on a wildlife water; if that is the case, the water would likely have been dry and any repairs would be improving conditions for wildlife. The Department makes every attempt to avoid creating disturbance wildlife and hunters during a hunt.

**Comment:** Is there a list of AZGF Hunt Unit Managers and their contact information available to the public? Considering the percentage of private and other inaccessible land, I wish to ask specific questions about access to public land in Unit 19B. Thanks

**Department Response**: Your best option is to use our Recreational Access Map tool. Here is the link: <a href="https://azaccessmap.com/">https://azaccessmap.com/</a>. If you are unable to answer your questions with this tool, call the Department's Regional Office for the area you are interested in and they will attempt to help you.

**Comment:** In light of the USFWS changes to waterfowl season guidelines that now allow the season to go through Jan 31st instead of the last Sunday of January I would like AZGFD to consider pushing the start of the Desert Zone Waterfowl season back a week or two and end the season on Jan 31st for the 2020/21 season and beyond. This would still allow the season to be within the 107 day season structure for the liberal season guidelines and would increase hunter opportunities during the peak of the migration. The 2 day Youth Only Waterfowl Hunt could still be held the first weekend after Jan 31st without any changes which usually falls on the first weekend in Feb.

**Department Response**: We will consider your suggestion in relation to USFWS Federal Frameworks and current waterfowl hunt structures in Arizona when we begin the next cycle of waterfowl hunt recommendations.

Comment: My name is XXXX and I am a 24 year resident of Arizona. I would like to request that the waterfowl season be shifted to allow the last day to be Jan 31 instead of the last Sunday in January. The federal guidelines have changed to allow this. As a far southern state with high temperatures, the birds often do not arrive until January. Shifting the season to Jan 31st will allow us a few more days of hunting and still be within the federal regulations. I do not believe that this would have any significant effect on the total number of birds taken, as very few people are still hunting at this time; most are burnt out or don't correlate January with waterfowl season. For us diehard waterfowlers, this may allow us to have one or two successful hunts on year that we would otherwise see none. Thank you for the consideration.

**Department Response**: We will consider your suggestion in relation to USFWS Federal Frameworks and current waterfowl hunt structures in Arizona when we begin the next cycle of waterfowl hunt recommendations.

**Comment:** Why do you hunt bears so early in the year (August 9) in hot weather conditions? You're just asking for bear hides & meat to get wasted!!

**Department Response**: In areas that historically have had higher rates of human-bear conflicts, late spring or early fall seasons have been used to address these conflicts by reducing bear density or changing bear behavior during the peak human-conflict bear season (summer). The goal for the timing of these hunts is to manage bear numbers and behavior before they become conditioned to humans and human-related food sources (camp coolers, bird feeders, dog food, garbage, etc.).

**Comment:** I will be 72 in September and have a Pioneer license. We as elderly hunters do not have much time left in live to enjoy the outdoors and to hunt big game. It is becoming very have to get drawn for elk and deer and I see my opportunity to hunt big game slipping away. I am requesting that Ariz game and Fish and the Commission to submit a change so that any Arizona that holds a Pioneer License to automatic be issued his or her first choice for elk and deer hunts. I believe that with all the years of supporting our Fish and Game and also as a Veteran I (and all others) deserve this consideration. Thank you for this consideration.

**Department Response**: We appreciate your interest. Your suggestion would require a change to Commission rules that govern seasons and permit-tags. Your suggestion will be shared with our Rulemaking section for consideration during the next review of these rules.

**Comment:** How much \$\$ has the Az G&F lost over the last 25 years from not allowing people to apply for both sheep, desert & rocky?

**Department Response**: We appreciate your interest. Separating bighorn sheep into 2 draw categories would require a change to the rules that govern the draw process. Your comment will be share with our Rulemaking section for consideration during the next review of these rules.

**Comment:** Can you please consider starting the Desert Zone duck hunting season later and extending till the last day of January, which is no allowed by federal law?

**Department Response**: We will consider your suggestion in relation to USFWS Federal Frameworks and current waterfowl hunt structures in Arizona when we begin the next cycle of waterfowl hunt recommendations.

**Comment:** If I have a Pioneer License, I won't be entering my small game hunt success info each year, but would still like to report it. Where can I do that?

**Department Response**: The Department is developing an online Small Game Hunter Questionnaire. This questionnaire should be available by January 2020. The questionnaire will be located on this webpage: <a href="https://www.azgfd.com/Hunting/Questionnaires/">https://www.azgfd.com/Hunting/Questionnaires/</a>.

**Comment:** First, is a hunter able to collect a skull/rack from a dead elk in the field? Say one that has been decomposing for some time. Second, what does a hunter do if they locate a freshly killed bull elk that died from fighting another bull elk? Are they required to tag it as their hunt kill? Should they leave the meat as waist or can it be taken?

**Department Response**: Yes, you may pick up parts as long as they are not fresh. If you question whether it is fresh at all, you should contact the local wildlife manager. As to your second question, you should contact the local wildlife manager or Department regional office. I don't recommend tagging it and you definitely cannot just take it. The regional office phone numbers are located in the front of each regulation book or on our website.

Comment: I was unable to watch the web cast on 8/15 but I did watch the video that was placed on the AGFD website. I am somewhat confused as to how output of older age class bulls is monitored as a great deal has changed since I was involved with developing mgt. strategies for unit 9. Based on what I understood from the video that Unit 9 (and other alternative elk mgt. units) are being managed primarily from questionnaire data that records antler points and some cementum analysis. Having patrolled in unit 9, I know it is very difficult to gather much information from archery hunters (and early season firearms/mzl hunters) because of the size of the unit, low density of hunters and the fact elk carcasses are moved quickly to processing facilities due to the warm weather. As I recall the November Gen. Bull hunt was treated as the early rifle hunt is in the 12A deer hunt; i.e. the output of the archery hunt (and later early mzl. and firearms) primarily drove the harvest program. I realize costs dictate what data can be collected and prices are increasing but I strongly feel the institution of a 100% tooth collection hunter solicitation is needed; at least for a few years to establish a baseline of the average age of the harvest. If the alternative mgt. outputs are going to be met, they must be based on real metrics. In the late 70s and early 80s along with Game Branch. I began a hunter elk tooth solicitation program in unit

5Aand B. I also believe it included 6A once or twice. Hunter cooperation was excellent. Reports of this effort are recorded in the Fed. Aid Reports (Red Books). I do not believe antler points provide a clear picture of age structure and if a specific output is desired, it must be properly measured which will promote proper herd management. As a side comment, early bull rifle hunts tend to sharply impact the older age class bull cohort. As such they must be closely monitored. Declines in this cohort may result in significant alterations of hunting opportunities, to include reduction of archery tags, elimination of early mzl/rifle hunts on any given year. Given a poor calf crop which reduces the number of bulls in that cohort, the effects will be dramatic by the time the cohort reaches 4-6 yrs. of age. As a strategy I suggest alternative management units should managed to conservatively load the old older cohorts to offer a buffer in years where calf crops are poor and in subsequent years when the impacts of this factor moves through the older cohorts. In summary I strongly believe if a specific output is defined in guidelines, then that output must be properly managed. It must be realized that alternative mgt. bares a cost to hunting opportunityno free lunch. The bright side to it is a more diverse age structure in the bull population provides for better population stability over time. On another subject that differs from the above: I strongly believe hunting has become too technology dependent. All one has to do is look at the equipment a hunter carries/uses today to bear this out. This includes all hunting methods: firearms, archery, mzl, and handgun. To partially overcome this trend and to restore the basic fundamentals of hunting (stalking, marksmanship, etc.), I suggest the establishment of seasons that restrict the method of take to rifles with only iron sights. I do not want to see hunts added, as there are already too many. Instead I would suggest some of the current hunts be so restricted. I know this would require rule changes, definitions, etc. but I wanted to offer it as a point of consideration. Thank you for the opportunity to comment.

Department Response: Thanks for providing your thoughts. Currently, for elk alternative management units, we use both population survey and harvest data to determine if we are providing that older age class. This is done by managing for more bulls in the population and tracking the percentage of bulls with 6+ antler points per side in the early hunts. We have started collecting teeth from both the early and late bull hunts (all methods of take) to help determine what the age structure actually is in the alternative management units. This is addressed in guidelines (to collect and analyze the teeth) but a specific age guideline parameter has not been established yet. Tooth submission is not mandatory and submissions are low. We continue to work on improving this data set. As to your second suggestion, a change to the seasons would be considered through Article 3 rules. I have copied rulemaking on this email so your comment will be kept on file for the next review cycle. There is definitely a lot of interest in what you propose but there are split views.