

Special Hunt Points – An Evaluation of Potential Change

June 2021

Request: The Commission’s ADA advisory Committee asked the Commission to consider reversing a decision made in 2010 (see [WAC 220-412-080 \(4\)\(d\)\(iii\)](#)) that replicated preference points in the Hunters with Disabilities category (and others). *The main reason for this is because there is a concern that hunters who became disabled since 2010 have an unfair advantage competing for permits in the “Hunters with Disabilities” category because they received and have carried forward those replicated points from 2010.*

Additional Question: The same 2010 decision affected the “Over 65” and “Master Hunter” categories. Would the Commission consider reversing the 2010 decision for those categories in addition to the Hunters with Disabilities category?

Background information: In 2009/2010, WDFW changed our licensing system and our special hunt drawing system. The changes to the drawing system included creating several different categories of hunt choices for hunters. Those choices changed from just being species-based (e.g. Deer, Elk, Moose) to having several categories within a species (e.g., Quality Deer, Buck, Antlerless Deer, Over 65 Deer, Hunters with Disabilities Deer, and Youth Deer).

After undergoing a public rulemaking process, the Commission approved WAC 220-412-080 (4)(d)(iii), which authorized all hunters who had special permit points in 2009 to receive that same number of points in all of the new categories, even if they did not currently qualify. *An example of the result of that decision – Elk hunter had 4 “Elk” points and after the rule change, had 4 points in each of the elk categories (Quality Bull, Bull, antlerless elk, 65 and Over, Hunters with Disabilities, and Youth) even if they were not over 65, disabled, or youth.*

This was done for two primary reasons: 1) workload associated with contacting approximately 137,000 hunters and ask what to do with their points and 2) the new licensing system could not easily accommodate a more complicated approach.

In an effort to inform the current discussion around this topic, data from the WDFW licensing database was used to illustrate how hunters who become eligible to apply for the “Hunters with Disabilities” permits affect the outcomes of different special permit drawings. In 2021, there are 58 different deer hunts with 378 permits; 24 elk hunts with 94 permits; and 2 moose hunts with 2 permits. Each of these hunts have their own drawing statistics, but for the purposes of this effort, hunts were grouped by species to give an over-arching evaluation of the situation. In addition, some general information about the number of hunters who have preference points for the Hunters with Disabilities category are presented (Table 1).

Table 1

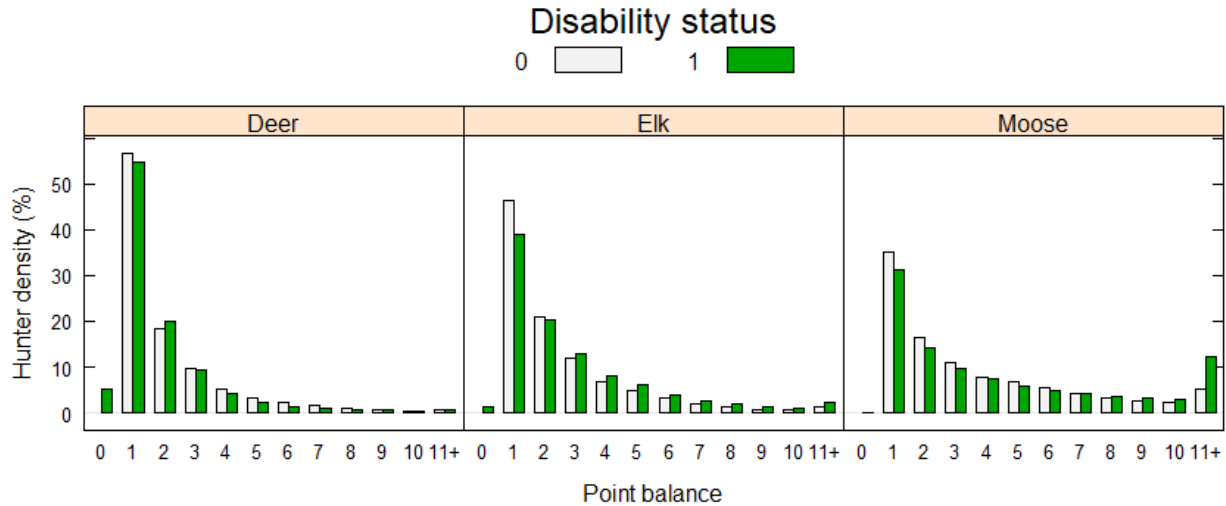
Number of hunters who had Preference Points in species categories (e.g., deer and elk) in 2009 and had their points replicated from the species categories to all new categories, including the disabled hunter categories	~140,000
Number of hunters who qualified for the newly established disabled hunter categories at the time of the 2010 drawing	~11,000
Number of hunters added to the disabled hunter status since the 2010 drawing (NOTE: not all of these hunters have points from 2009/2021)	~5,000
Number of hunters as of 2021 that have points in one or more disabled categories that don't qualify as a disabled	~124,000

The number of preference points held by current hunters with disabilities is slightly different than hunters who have preference points but do not yet qualify for Hunters with Disabilities hunts (i.e., carried forward from 2010) (Table 2). Points are typically gained by applying for a hunt and points are zeroed out when a hunter successfully draws a permit. These points are squared and represent the number of “names in the hat” each hunter has for a drawing, thus affecting drawing odds. The averages in Table 2 can also be considered in light of the distribution of hunters in different point levels, ranging from zero to 11+ (Figure 1).

Table 2

	<u>Deer</u>	<u>Elk</u>	<u>Moose</u>
Current <u>average</u> number of "Hunters with Disabilities" points for hunters <u>eligible</u> to apply for “Hunters with Disabilities” hunts	2.84	3.85	5.69
Current <u>average</u> number of "Hunters with Disabilities" points (given to them in 2010) for hunters <u>who are not eligible</u> to apply for “Hunters with Disabilities” hunts	3.11	3.48	4.68

Figure 1. Graphs illustrating the percentage of hunters with different point levels for hunters who currently qualify for Hunters with Disabilities permits (green) and those who do not (gray).



Considering the distribution of points among hunters in both groups and the drawing process where points are squared, the theoretical odds of being drawn for each group can be calculated (Table 3). Those calculations show that, in the first year, hunters who are not currently eligible to apply would have about a 20% greater chance of drawing a deer tag ($13.1/10.9 = 1.20$), about 20% less chance of drawing an elk tag ($17/21.5 = 0.79$), and about a 40% less chance of drawing a moose tag ($31.6/52.1 = 0.61$). With a small sample size of 4 drawings (2017-2021), results show that hunters new to the Hunters with Disabilities category drew at a slightly higher rate (Table 3).

Table 3

Theoretical odds of being drawn for a special permit hunt	Deer	Elk	Moose
Not currently eligible/Currently eligible	13.1/10.9	17/21.5	31.6/52.1
Results of 4 real drawings, averaged (2017-2020) (small sample size)			
Percent chance of being drawn in a "Hunters with Disabilities" hunt for hunters <u>currently eligible</u> to apply for "Hunters with Disabilities" hunts	35.5	7.5	0.4
Percent chance of being drawn in a "Hunters with Disabilities" hunt for hunters <u>who are not currently eligible to apply</u> for "Hunters with Disabilities" hunts	51.8	8.3	0.9

The drawing results from 2017-2020 show that newly disabled hunters made up 4.4% of deer permit applicants and drew 6.2% of the available permits. They also made up 4.0% of the elk permit applicants and drew 4.5% of the permits and 3.0% of the moose permit applicants and

drew 6.3% of the moose permits (Table 4). Again, this is a relatively small sample size, and, over the long term, the theoretical odds should be realized.

Table 4

Species	Hunter group	Season				total	% new of total	% win by group
		2017	2018	2019	2020			
Deer	Applying disabled hunters	879	963	975	985	3802	4.4	35.5
	Newly disabled applicants	47	40	43	36	166		
	Successful applicants	384	326	341	326	1377	6.2	51.8
	Successful newly disabled applicants	28	19	22	17	86		
Elk	Applying disabled hunters	1677	1642	1670	1597	6586	4.0	7.5
	Newly disabled applicants	86	71	69	39	265		
	Successful applicants	132	140	124	98	494	4.5	8.3
	Successful newly disabled applicants	9	7	5	1	22		
Moose	Applying disabled hunters	870	923	949	942	3684	3.0	0.4
	Newly disabled applicants	32	38	26	16	112		
	Successful applicants	4	4	4	4	16	6.3	0.9
	Successful newly disabled applicants	1	0	0	0	1		

Tables 3 and 4 present data associated with hunters entering the Hunters with Disabilities drawing pool in their first year of eligibility. However, these hunters stay in the drawing pool in outgoing years and may continue to apply for special permits and accrue points. Due to data limitations, hunters with points from the 2010 decision who remain in the pool past the first year are indistinguishable from other disabled hunters with accrued points already in the pool. For this reason, these hunters had to be considered part of the pool of hunters who are “already qualified” to apply.

In addition, no attempt was made to do a similar statistical analysis for the “Over 65” or “Master Hunter” categories. If this information is needed, more work would be needed to determine point distribution and drawing odds.

POTENTIAL OPTIONS

1. Make a rule change removing points from hunters who are not currently eligible to apply for Hunters With Disabilities special permits.
2. Make a rule change removing points from hunters who are not currently eligible to apply for Hunters With Disabilities, Over 65, or Master Hunter special permits.
3. Status quo – make no change to the existing rule re: point distribution