

State of California  
Fish and Game Commission  
Initial Statement of Reasons for Regulatory Action

Amend Sections 702 and 715  
Title 14, California Code of Regulations  
Re: Special Hunt Permit Issuance and Drawings in ALDS

I. Date of Initial Statement of Reasons: March 15, 2023

II. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: April 19-20, 2023

Location: Fresno

(b) Discussion Hearing

Date: June 14-15, 2023

Location: Sacramento

(c) Adoption Hearing

Date: August 22-23, 2023

Location: Fortuna

III. Description of Regulatory Action

(a) Statement of Specific Purpose of Regulatory Change and Factual Basis for Determining that Regulation Change is Reasonably Necessary

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

The proposed regulations are intended for and necessary to the implementation of the goals and strategies outlined by the California Department of Fish and Wildlife's (Department) *Recruitment, Retention and Reactivation (R3) Action Program in the R3 Action Plan and R3 Implementation Strategy*. The R3 Program focuses on reversing the decline and reducing barriers associated with hunting, fishing, foraging and shooting sports participation. For more information on the background of R3, please see the Department's website

<https://wildlife.ca.gov/R3>.

Among the goals found in the R3 Implementation Strategy are to improve marketing and outreach activities that support outdoor pursuits, and the creation and integration of electronic resources to aid the public in accessing those outdoor pursuits. In part, the Department's R3 strategy highlights a need for the establishment of a better system to provide uniquely tailored hunting opportunities and social support to new adult and junior (under age 16) hunters, disabled/mobility impaired hunters, and military veteran hunters. Bringing new hunters into the field is essential to developing their experience and confidence, thus the Department's facilitation of these special hunt mentorship opportunities is key to securing a future for recreational hunting in California.

National R3 data indicates that recruitment into hunting participation is a gradual process that occurs over a period of several years. Presently, the Department provides special hunting

opportunities according to the *Policy and Definitions for Upland Game Bird Apprentice Hunts*. In accordance with the policy, and since 2011, the Department has offered new and junior hunters opportunities through the *Special and Apprentice Hunts Online Registration System* (SAHORS) accessible only through the Department's website. There are substantial limitations for available hunts due to the outdated SAHORS system:

- The SAHORS system is not supported by the Department's Data and Technology Division (IT). Often requests for IT help cannot be fulfilled due the out of date system requirements. This is an impediment to the Department's ability to ensure equity and transparency.
- These hunt draws are coordinated by Department staff, rather than dedicated ALDS specialists and licensing analysts. The process of executing a drawing using SAHORS requires the operator to work sequentially through each hunt drawing because propagation of the random draw results through a series of web servers is a process that occurs over a period of up to 20 minutes and commonly fails.. Ancillary information and statistics must be captured and extracted from the SAHORS by copying and pasting individual cells from the website interface into Excel. SAHORS does not store information after the date of the hunt and SAHORS has no utilities to output any system data other than the final hunt roster for a given drawing.
- Special Hunt permit issuance for disabled hunters currently relies on SAHORS to execute drawings according to the Policy and Definitions for Upland Game Bird Apprentice Hunts. Because of the limited accessibility of SAHORS there is a potential barrier to some disabled users.
- Significant concerns have been raised about the equitability of applying for hunts in the SAHORS as hunters are less familiar with SAHORS than with the Automated License Data System (ALDS) where most other Department licenses, permits and validations may be purchased.
- All selections in SAHORS are treated like "first choices." Customers can apply for as many hunts as they wish, which without well-defined limits, decreases an applicant's probability of success to be drawn for an individual hunt. This affects participation rates since hunters are under no obligation (no fee and unlimited choice) to attend on the day of the hunt. Day-of-hunt participation is often lower than what could be supported with existing available hunting opportunities if permits were distributed more equitably among qualifying applicants for these opportunities.
- SAHORS does not store or export data that is valuable to understanding the efficacy of the Department's R3 efforts. This may include an individual's history of Special Hunts participation and cross referencing special hunt participants with purchases of other licenses, permits and validations for other outdoor activities. By better understanding the types and the timing of activities that the Department's new hunters engage in, the Department can better tailor its special hunting opportunities and individual hunt parameters to meet the needs of the hunting public. ALDS can store, query and reference customer data to provide a more tailored electronic resource for the public as well as provide the data integration and management necessary for the Department to assess the implementation of current strategies outlined in the R3 Implementation Strategy. ALDS is capable of adding new functionality to accommodate these special hunt opportunities.

- A key demographic in R3 are “adult-onset”. This refers to persons that have completed hunter education but have not yet purchased their hunting license, sometimes taking years to do so. These hunters may be of any age. SAHORS does not provide for special hunt drawing opportunities that target these adult-onset hunters as an encouragement to begin their hunting experience.

### Current Regulations

Since first entering use in 2010, the ALDS (as set forth in Section 700.4) has been the single source for issuing hunting licenses and conducting the drawings for big game (deer, elk) license tags (sections 708.15 and 708.16). The current provisions of Section 715, approved in 2017, regarding the Upland Game Bird Special Hunt (UGH) Drawing, was introduced in order to fairly distribute limited UGH opportunities. However, the ALDS system is capable of far more.

The terms “new hunter” and “mobility impaired hunter” are not defined in regulations. Current regulations for deer, antelope and elk special hunts use the term “Apprentice,” synonymously with “junior hunter,” as defined in Fish and Game Code (FGC) subdivision 3031(a)(2) when defining eligibility for deer, antelope and elk special hunts. The term “disabled license holder” is not currently defined in regulation; however, Section 3033, FGC, specifies eligibility requirements for reduced fee hunting licenses for disabled veterans and recovering service members.

Current provisions of subsections 715(a) through 715(c) allow for the use of ALDS to conduct drawings and issue permits to licensed hunters for hunting opportunities using the “Draw-by-Choice” drawing functionality in ALDS. However, these regulations do not accommodate the issuance of permits for new hunters, disabled hunters or military veteran hunters because these opportunities are governed by an existing policy that relies on SAHORS for issuance of these permits.

### Proposed Regulations

The amendments to Section 715 are designed to facilitate three R3 goals:

- 1) reduce barriers to entry by providing an opportunity for new hunters to participate in the Department's many hunting offerings through the use of the ALDS;
- 2) increase availability of hunting opportunities to new hunter education graduates and junior hunters; and
- 3) increase availability of hunting opportunities to veterans and disabled hunters.

The proposed regulation changes would bring new special hunt opportunities into ALDS where the public currently accesses other Department licenses, permits, and validations. This will result in improved efficiency of permit application and issuance for the public. ALDS provides greater equity and transparency to the process of permit issuance and drawings. ALDS also has significant IT support within the Department.

Accessing drawing opportunities in ALDS is much more straight-forward for new hunters since all hunters must use this system to purchase licenses and validations and to apply for tags and other draws. ALDS is updated in real time to recognize a new hunter's eligibility for hunt groupings based on the upload of a recent California Hunter Education Certificate

to that graduate's ALDS profile. Facilitation in ALDS is expected to increase application rates for these opportunities. This was observed when spring turkey hunts were moved from SAHORS to ALDS. Therefore, this move would support the Department's R3 Plan by providing information on the activity status of new hunters through time, something the Department needs in order to assess whether these hunting opportunities have an impact on retaining new hunters.

In accordance with the R3 Implementation Strategy and to improve new hunter participation in drawings, these regulations would allow the Department to offer opportunities that provide recent hunter education graduates with an educational, controlled, and safe setting to learn hunting skills and hunter ethics. Thus, achieving the goal of providing a positive experience and necessary social support for new hunters. To align with this, it is proposed that a new category of hunter be defined in these regulations in order to facilitate permit issuance for special hunt opportunities which can target this broader group of adult-onset hunters. The proposed definition of a "new hunter" is someone issued their first California Hunter Education Certificate of completion within the last four years and who has not held a California hunting license for more than four license years.

National R3 data indicates that recruitment into hunting participation is a gradual process that occurs over a period of several years. The proposed four-year interval for designation of new hunters is considered adequate to recruit adult-onset hunters, which are the largest recruitment demographic.

Similarly, the R3 Implementation Strategy aims to improve participation for apprentice, disabled/mobility impaired, and veterans. These regulations would allow the Department to offer opportunities that provide apprentice, disabled/mobility impaired, and military veteran hunters with an educational, controlled, and safe setting to learn hunting skills and hunter ethics.

#### Proposed Regulation Changes to Section 702. Fees.

Subsection 702(c)(1)(X). This subsection is renamed from "Upland Game Bird Special Hunt Drawing Application Fee" to the more generalized "Special Hunt Drawing Application Fee". The fee is updated in accordance with Section 713, FGC, to \$2.50. In accordance with Section 1050, FGC, the fee is an amount sufficient to recover all reasonable administrative and implementation costs of the department relating to the addition of the Special Hunt Draws described in Section 715.

Additionally, a small three percent nonrefundable application fee (\$0.08) for ALDS is charged in accordance with Section 700.4.

#### Proposed Regulation Changes to Section 715.

Section 715. Special Hunt Permit Issuance and Drawings in ALDS. A new title to the section emphasizes the addition of the draw system to ALDS.

**(a) Special Hunts.** "Upland Game Bird" is removed from the subsection title. The hunt draws are not restricted to upland game bird hunts; the proposed changes to the regulation will allow ALDS to be used for drawings for other species. Limited opportunity creates a need for a fair and equitable process of distributing available permits.

(a)(1) The proposed changes to this subsection replace the word “conditions” with “parameters” to clarify those elements to be considered, replace “number of reservations available” with “permit issuance method,” and provide some specific demographics as examples of applicant attributes which define the opportunity. The department will set all the parameters and the number of available permits for each draw, unless there is already a specified hunt in regulation.

(a)(1)(A) This subsection allows certain hunts to be set aside for apprentice hunters in accordance with the R3 policy.

(a)(1)(B) This subsection allows certain hunts to be set aside for mobility impaired, disabled veteran, and recovering service member hunters in accordance with the R3 policy.

(a)(1)(B)1. This subsection introduces the definitions of a “mobility impaired hunter” defined as possessing one of the items described in subsections (a)(1)(B)1.a. and b.

(a)(1)(B)1.a. This subsection provides the description and definition of a mobility impaired hunter based on possession of a special disabled license plate issued pursuant to California Vehicle Code Section 5007.

(a)(1)(B)1.b. This subsection provides the description and definition of a mobility impaired hunter based on possession of a disabled person parking placard issued pursuant to California Vehicle Code Section 22511.55 or California Vehicle Code Section. 22511.59.

(a)(1)(B)2. This subsection provides the definition of a “disabled license holder” for hunters who possess a hunting license issued pursuant to FGC Section 3033.

(a)(1)(C) This subsection allows certain hunts to be set aside for new (adult) hunters in accordance with the R3 policy and defines a new hunter as someone who has been issued their first California Hunter Education Certificate of completion within the last four years and has not held a California hunting license for more than four license years.

(a)(1)(D) This subsection allows certain hunt opportunities to be set aside for hunters based on veteran status, and provides the requirement for applicants to be considered “veteran status.”

(a)(2) Existing text in this subsection specifies that each hunt shall be assigned to a “hunt group(s)” based on hunt conditions and that the Department will run a separate drawing for each hunt group. The proposed regulation changes “conditions” to “parameters” consistent with subsection (a)(1). In addition, “run a separate drawing” is replaced with “establish the permit issuance methods specified in subsections (c) through (e).” This change is necessary to accommodate the new types of hunting opportunities that will be available.

**(b) New subsection title replacing “Upland Game Bird” with “General Application and Eligibility and Procedures.”**

(b)(1) This subsection states that applicants for special hunt permits would now be required to apply through the Department’s ALDS terminals at Department license agents, Department license sales offices or on the Department’s website.

(b)(2) There are no changes to this subsection which specifies that the applicant may be a resident or nonresident with the appropriate hunting license.

(b)(3) This subsection, specifying that applicant for an apprentice junior hunt must possess a valid junior hunting license, is replaced with language in subsection (a)(1)(A).

(b)(4) This subsection, stating that two-day nonresident hunting licenses shall not be used to apply for Upland Game Bird Special Hunt Drawings, is repealed as it is redundant with language in subsection (b)(2) requiring an annual hunting license. In addition, the proposed regulations will not be limited to drawings only for upland game birds.

(b)(5) Text from this subsection is moved to subsections (c)(3), (d)(2) and (e)(2).

(b)(6) through (b)(8) and (c) through (c)(2) These subsections, related specifically to upland game bird special hunt application and drawing procedures, are revised and replaced with language in proposed subsection (d) regarding draw-by-choice drawings.

(c)(3) Current subsection (c)(3) concerning notification of drawing results is moved to proposed subsection (f) and revised.

**(c) Issued Upon Request Procedures.** This subsection is proposed to outline the new “issued upon request” procedures using ALDS. This method is used when the demand for the opportunity is not expected to exceed the number of available permits.

(c)(1) This subsection specifies that permits for the hunt group will be made available at least 10 days prior to the hunt start date. Having permits available 10 days prior to the start date ensures that the hunter can plan their hunting trip.

(c)(2) This subsection specifies that eligible applicants are limited to one permit per hunt group and may claim a permit until all available spaces are filled. Limiting the number of permits per applicant is necessary to ensure a fair and equitable process of distributing available permits.

(c)(3) This subsection informs the applicant of the requirement to submit a non-refundable application fee and where to find the amount of the fee.

**(d) Draw-By-Choice Procedures.** Text from previous subsections (b)(6) through (b)(8) and (c) through (c)(2) is revised and moved to subsection (d) which outlines the new draw-by-choice application and drawing procedures using ALDS.

Draw-by-choice is a method of fairly distributing the available permits when demand for the opportunity exceeds the number of available permits. Draw-by-choice is used for those hunts (for example, hunts for deer, wild birds, elk, other mammals) in which “parties” of hunters most often participate.



(d)(1) Current subsection (b)(7), specifying the application deadline, is revised for clarity and moved to this subsection.

(d)(2) Current subsection (b)(5), informing the applicant of the requirement to submit a non-refundable application fee and where to find the amount of the fee, is revised for clarity and moved to this subsection.

(d)(3) Current subsection (b)(8) is revised and moved to this subsection. "For drawings that allow party applications" is added to the text in new subsection (d)(3). This clarifies to the public that the option for party application is not always available for every Draw-By-Choice hunt drawing,

(d)(4) through (d)(4)(B) Current subsections (b)(8)(A) through (b)(8)(C), regarding assignment and use of party identification numbers, are revised for clarity and moved to subsections (d)(4) through (d)(4)(B).

(d)(5) Current subsection (b)(6), specifying that an applicant may submit one application per hunt group with up to three hunt choices, is revised and moved to this subsection. Revisions to this the language specify that applicants may select up to the maximum number of available hunt choices within that hunt group, in their order of preference, and that the Department will set the maximum hunt choices based on the parameters of the hunt grouping and the number of permits available within that hunt group. The new language is more permissive and would allow the Department flexibility to offer any number of hunt choices within a hunt grouping in ALDS to better match hunt parameters and the availability of existing hunt opportunities to public demand.

(d)(6) The first two sentences of current subsection (c)(2), concerning the assignment of computer-generated random numbers, are revised for clarity and moved to this subsection.

(d)(7) This subsection specifies that the Department will conduct Draw-By-Choice drawings at least 10 business days prior to the earliest hunt date. This provides consistency with subsections (c)(1) and (e)(7). Ten days makes these opportunities accessible to a larger group of hunters since planning for a hunt trip involves logistical considerations that can take more than a week.

Additionally, if an application is processed in the drawing and the available permit quota is less than the total number of party members the application will be unsuccessful, thus ensuring that party applications in drawings will be processed according to the established hunt quota such that the quota is not exceeded. For example, if the last application drawn is for a party of four but only three permits remain, the computer will move to the next available application for one, two or three members until all permits are issued.

(d)(8) The provision in the third sentence of the current subsection (c)(2)) is moved to this subsection and revised to state that *permits* are awarded to applications based on hunt choice and random number (lowest to highest) until the reservation quota has been met.

**(e) Draw-By-Hunt Procedures.** This subsection specifies the new “draw-by-hunt” procedures using ALDS. This method is used when demand for the opportunity exceeds the number of available permits. Draw-by-Hunt is most often conducted for waterfowl hunts. These hunts do not require a party leader; each applicant is an individual. Generally, each hunt group is a specific location on a specific date. Each applicant applies once for each opportunity, for as many as they may like.

(e)(1) This subsection specifies that applications must be submitted via ALDS at least 21 days prior to the hunt date. This deadline is consistent with draw-by-choice applications specified in proposed subsection (d)(1).

(e)(2) This subsection informs the applicant of the requirement to submit a non-refundable application fee and where to find the amount of the fee.

(e)(3) This subsection specifies that party applications are not allowed but permits may be valid for one or more additional hunters provided that the permit holder participates in the hunt. This provision is necessary to specify that, unlike Draw-By-Choice permits, only one individual is named on the permit. When the permit conditions may allow for additional hunting or nonhunting individuals to participate, they may only do so in tandem with the permit holder.

(e)(4) This subsection specifies that each applicant may apply only once for each hunt. This provision is necessary to ensure a fair and equitable process of distributing available permits where each qualifying applicant has an equal chance of being drawn for a hunt.

(e)(5) This subsection specifies that each application will be assigned a computer-generated random number. This ensures that each applicant is given the same chance at a successful draw.

(e)(6) This subsection specifies that permits are awarded to applications based on hunt choice and random number (lowest to highest) until the permit quota has been met and ensures a fair and equitable process of distributing available permits.

(e)(7) This subsection specifies that the Department will conduct drawings at least 10 days prior to the earliest hunt date. This is consistent with the 10 days specified in proposed subsections (c)(1) and (d)(7).

**(f) Drawing Results.** Current subsection (c)(3), concerning notification of drawing results, is moved to this subsection and revised to specify that drawing results will be available by logging in to the customer’s ALDS profile. The provisions that successful applicants will be notified and unsuccessful applicants will not be notified is unchanged.

Authority and reference citations for Section 715 are proposed to be updated.

## (b) Goals and Benefits of the Regulation

FGC subdivision 1050(b) provides that the Fish and Game Commission (Commission) shall determine the form of all licenses, permits, tags, reservations, and other entitlements and the method of carrying and displaying all licenses. The Commission determines that these changes will benefit the public and the Department by increasing the visibility of these new



hunter draw opportunities and the efficiency of the application process, by moving them from the lesser-known SAHORS to ALDS. The fee is for the recovery of reasonable administrative costs for permit issuance.

The proposed regulation will better promote fairness and equity in the accessibility of the Department's special hunt opportunities and will increase transparency in government by elucidating the details of the draw processes for these public hunting opportunities. The proposed regulation will increase public exposure to and attendance rates for special hunt opportunities targeted at new hunters, disabled and military veteran hunters, by streamlining all of the licensing and application processes into ALDS.

The proposed regulation will benefit the Department's R3 goals by 1) utilizing the capabilities of ALDS to increase public exposure to special hunt opportunities 2) simplifying the application process for the public and 3) leveraging more effective and powerful data management tools for the Department.

The proposed regulation would reduce staff time involved with maintaining a hunt permit drawing system separate from ALDS and reduce frustration on the part of the public.

(c) Authority and Reference Sections from Fish and Game Code for Regulation

Authority: Sections 200, 203, 265, 331, 332 and 1050, Fish and Game Code

Reference: Sections 200, 203, 203.1, 265, 331, 332, 713, 1050, 1055, 1055.1, 1570, 1571, 1572, 1573, 1745, 3682.1, 3950, 3951, 4302, 4330, 4331, 4332, 4333, 4336, 4340, 4341, 4652, 4653, 4654, 4655, 4657, 4750, 4751, 4752, 4753, 4754, 4755, 4902, 10500 and 10502, Fish and Game Code

(d) Specific Technology or Equipment Required by Regulatory Change

This change will mean that the hunting public will access these special hunt opportunities directly using the same ALDS system that the hunting public currently uses for most other licenses, tags, permits and validations. ALDS can also be accessed through point-of-sale opportunities at retailers such as Walmart and hunting and fishing stores. The hunting public will no longer use the Department SAHORS within the Department's website to apply for special apprentice hunt opportunities.

(e) Identification of Reports or Documents Supporting Regulation Change

California Department of Fish and Wildlife, Statewide R3 Implementation Strategy, available from: <https://wildlife.ca.gov/R3>

(f) Public Discussions of Proposed Regulations Prior to Notice Publication

This regulation concept was presented at the September 16, 2021, September 15, 2022, and January 11, 2023, WRC meetings of the Commission's Wildlife Resources Committee where the National Wild Turkey Federation expressed support for the concept and its goal of broadening access and availability of special hunt opportunities for apprentice hunters.

#### IV. Description of Reasonable Alternatives to Regulatory Action

##### (a) Alternatives to Regulation Change

No alternatives were identified by or brought to the attention of Commission staff that would have the same desired regulatory effect.

##### (b) No Change Alternative

The no change alternative would maintain the existing stand-alone, web-based computer draw system for executing lotteries for the Apprentice special hunting opportunities offered by the department.

#### V. Mitigation Measures Required by Regulatory Action

The proposed regulatory action will have no negative impact on the environment; therefore, no mitigation measures are needed.

#### VI. Impact of Regulatory Action

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

##### (a) Significant Statewide Adverse Economic Impact Directly Affecting Businesses, Including the Ability of California Businesses to Compete with Businesses in Other States.

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states because this action is a Department administrative procedure.

##### (b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment.

The Commission does not anticipate any impacts on the creation or elimination of jobs, the creation of new business, the elimination of existing businesses or the expansion of businesses in California because the proposed regulation is administrative in nature and relates to internal Department processes for implementing existing Department-sponsored special hunting opportunities that will not affect existing businesses or prompt the expansion businesses in California. The Commission anticipates generalized benefits to the health and welfare of California residents, and no impacts to worker safety, or to the state's environment.

##### (c) Cost Impacts on a Representative Private Person or Business

The agency is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action. However, eligible hunters that choose to apply for special hunt drawings will incur an application fee of \$2.50 to enter each draw for special hunts.

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State

The Department projects an estimated \$12,000 increase in special hunt draw application fee revenue in the current year and ongoing. The fee is established to re-cover the per item implementation costs of the program. No costs/savings to federal funding to the state is anticipated.

(e) Nondiscretionary Costs/Savings to Local Agencies: None.

(f) Programs Mandated on Local Agencies or School Districts: None.

(g) Costs Imposed on Any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None.

(h) Effect on Housing Costs: None.

## VII. Economic Impact Assessment

Functional updates to ALDS may be required to manage Hunter Education Certificate numbers which are used as screening criteria to allow qualified individuals (i.e., new hunter) to apply for those groupings of special hunt opportunities. The costs for the maintenance of ALDS is offset by a per application fee of three percent, or about \$0.08 per item.

Hunting opportunities are currently offered in the SAHORS at no cost. The application fee, to recoup reasonable costs for participation in the special hunt draws, will be \$2.50 per Section 702, Title 14, CCR.

(a) Effects of the Regulation on the Creation or Elimination of Jobs Within the State

The Commission does not anticipate any impacts on the creation or elimination of jobs within the state because this action is a Department administrative procedure that will not affect the demand for jobs.

(b) Effects of the Regulation on the Creation of New Businesses or the Elimination of Existing Businesses Within the State

The Commission does not anticipate any impacts on the creation or elimination of jobs, the creation of new business, the elimination of existing businesses or the expansion of businesses in California because this action is a Department administrative procedure.

(c) Effects of the Regulation on the Expansion of Businesses Currently Doing Business Within the State

The Commission does not anticipate any impacts on the expansion of businesses in California because this action is a Department administrative procedure.

(d) Benefits of the Regulation to the Health and Welfare of California Residents

The Commission anticipates generalized benefits to the health and welfare of California residents. For those who participate in the program, the regulation is intended to provide clarity to the hunting public and make it easier for the public to apply for and participate in Special Hunts.

(e) Benefits of the Regulation to Worker Safety: None.

(f) Benefits of the Regulation to the State's Environment: None.

(g) Other Benefits of the Regulation

The proposed regulation is intended to provide consistency across application types and to provide clarity to the hunting public to make it easier for the public to apply for and participate in Special Hunts.

## Informative Digest/Policy Statement Overview

The amendments to Section 715, Title 14, California Code of Regulations (CCR), are designed to facilitate the implementation of the goals and strategies outlined by the California Department of Fish and Wildlife's (Department) Recruitment, Retention and Reactivation (R3) Action Program and the R3 Action Plan and R3 Implementation Strategy. The R3 Program focuses on reversing the decline and reducing barriers associated with hunting, fishing, foraging and shooting sports participation.

Among the goals found in the R3 Implementation Strategy are to improve marketing and outreach activities that support outdoor pursuits, and the creation and integration of electronic resources to aid the public in accessing those outdoor pursuits. In part, the Department's R3 strategy highlights a need for the establishment of a better system to provide uniquely tailored hunting opportunities and social support to new adult and junior (under age 16) hunters, disabled/mobility impaired hunters, and military veteran hunters. Bringing new hunters into the field is essential to developing their experience and confidence, thus the Department's facilitation of these special hunt mentorship opportunities is key to securing a future for recreational hunting in California.

Presently, the Department provides special hunting opportunities according to the Policy and Definitions for Upland Game Bird Apprentice Hunts. In accordance with the policy, and since 2011, the Department has offered new and junior hunters opportunities through the Special and Apprentice Hunts Online Registration System (SAHORS) accessible only through the Department's website. There are substantial limitations for available hunts due to the outdated SAHORS system. The current provisions of Section 715 are limited to upland wild bird hunts, and do not include other hunting opportunities offered by the Department. Section 715 does not provide additional opportunity to new, disabled, or veteran hunters.

Subsection 702(c)(1)(X) specifies the Upland Game Bird Special Hunt Drawing Application Fee.

The new provisions of Section 715 change the Special Hunt Draws to the Automated License Data System which can store, query and reference customer data to provide a more tailored electronic resource for the public as well as provide the data integration and management necessary for the Department to assess the implementation of current strategies outlined in the R3 Implementation Strategy. ALDS is capable of adding new functionality to accommodate these special hunt opportunities. This will result in improved efficiency of permit application and issuance for the public. ALDS provides greater equity and transparency to the process of permit issuance and drawings. ALDS also has significant IT support within the Department.

Accessing drawing opportunities in ALDS is much more straight-forward for new hunters since all hunters must use this system to purchase licenses and validations and to apply for tags and other draws. ALDS is continuously updated to recognize a new hunter's eligibility for hunt groupings based on the upload of a recent California Hunter Education Certificate to that graduate's ALDS profile. Facilitation in ALDS is expected to increase application rates for these opportunities. This was observed when spring turkey hunts were moved from SAHORS to ALDS. Therefore, this move would support the Department's R3 Plan by providing information on the activity status of new hunters through time, something the Department needs in order to assess whether these hunting opportunities have an impact on retaining new hunters.

The Department recommends the following changes to sections 702 and 715, Title 14, CCR:

702(c)(1)(X) The Upland Game Bird Special Hunt Drawing Application fee is renamed the Special Hunt Permit Application and is increased to \$2.50.

715(a) will define terminology and provide opportunities for new hunters, apprentice hunters, mobility impaired/disabled hunters and veterans.

715(b) will enable the use of ALDS for special applications and the equitable distribution of available permits.

715(c) sets forth the issuance procedures for additional method "Issued Upon Request".

715(d) provides procedures for "Draw-By-Choice" .

715(e) provides procedures for Draw-By-Hunt.

715(f) Provides an easy method for successful applicants to access drawing results online through ALDS.

Benefits of the regulations:

The benefits of the proposed regulations are improved access to hunting opportunities for new and apprentice hunters, mobility impaired/disables hunters and veterans. This is in accord with the goals of the Department and the Fish and Game Commission

Evaluation of incompatibility with existing regulations:

The Commission has reviewed its regulations in Title 14, CCR, and conducted a search of other regulations on this topic and has concluded that the proposed amendments to Section 702 and Section 715 are neither inconsistent nor incompatible with existing State regulations. No other State agency has the authority to promulgate hunting regulations.