

July 13, 2011

To: Washington Fish & Wildlife Commission

Subject: Proposed Rule Changes to WAC 232-12-243, *Public safety cougar removals*.

**OPPOSE**

Dear Chairperson Wecker, Commission Members:

The ostensible purpose of WAC 232-12-243 is to increase public safety and to reduce dangerous cougar/human conflicts. Modern scientific thought and study, much of it sponsored by the citizens of Washington state, shows unequivocally that the proposed rule will do neither, and will probably lead to additional conflicts.

In 1996, 1.39 Million Washington voters banned all sports hunting of cougars with dogs. The I-655 ban passed in all but two legislative districts. WDFW declared war on cougars, selling 60 times as many tags, and on the electorate, and by about 2000 was working Public Safety hunts that were thinly veiled hunting seasons for houndsmen. About 2001, Pilot Programs started in the northeastern counties of Washington that were also sports hounding programs. For the 15 years of the sports hounding ban, the WDFW has denied citizens their initiative in all but three. This year, working with the legislature, the citizens saw the cessation of the Pilot Program—a program that seems not to have produced any peer-reviewed science on its efficacy, but allowed WDFW to snub the citizens for whom WDFW is supposed to manage the wildlife as a public trust. I have watched videos of hearings and have attended meetings in which WDFW representatives state that there is no causal relationship between the hunting and the decrease in complaints regarding cougars. (In fact, complaints dropped statewide, not just in the hounding counties.) WDFW then repeats, “Complaints dropped.” Complaints are orthogonal to safety.

Now, we see WDFW try to change the WAC to change “Public Safety” to “Cougar Management.” This change is in direct conflict with RCW 77.15.245 that dogs are restricted to hunts for problem animals. Further, WDFW proposes to lower the bar to “perceived danger.” After reading complaints on the WDFW website, the Department should instead boost its revenues by charging a false-reporting fee. Statistically about 75% of reports of cougar are some other animal(s).

President Theodore Roosevelt, no stranger to hunting, wrote:

“It is true, as I have said, that a cougar will follow a man; but then a weasel will sometimes do the same thing. Whatever the cougar's motive, it is certain that in the immense majority of cases there is not the slightest danger of his attacking the man he follows.” (BiblioBazaar (2009) *The Roosevelt Book: Selections from the Writings of Theodore Roosevelt*, p 183)

A more scientific view states:

“Low levels of confirmed interactions coupled with exceedingly low interaction rates calls into question the validity of management decisions based on interaction reports while suggesting the **perceived** level of risk from cougars in residential areas disproportionately exceeds actual risk.” (University of Washington (2010) *Cougar Ecology, Behavior, and Interactions with People in a Wildland-Urban Environment in Western Washington*, Brian N. Kertson, Abstract) (Emphasis mine.)

Somehow, we are now to believe that if a cougar “shows no fear,” it is dangerous, or that if the viewer perceives the cat’s thought, a general hound-hunting season should ensue, with an arbitrary limit of 109 cougars, more if the hunters haven’t had enough, plus an early-bird bonus of a second cat. I would like to see *that* peer-reviewed study showing these proposed rules would make people safer.

I attended the stakeholders’ Cougar Forum in Olympia on June 17, 2011 as an observer. I came away impressed that WDFW sponsored a forum to explain the science behind cougars, and how the chaos that results from random hunting increases potential conflicts. I note that 1994 and 1995 were the two largest kill seasons of the previous 20 years, and, consistent with the science, complaints started rising, peaking in 2000 as the high kill rate of random cats persisted.

Earlier, I heard the presentation to the Commission that showed territory stacking and talked about spreading the hunt areas and quotas to conserve the resource. However, with this proposed rule change to the WAC, I see that not science, nor law, nor the public is the driving force, but recreation. But WDFW’s website shows that Wildlife Watchers bring \$1.5 Billion dollars and 26,000 jobs compared to hunting’s \$0.3 Billion and 5600 jobs. So not only is WDFW not managing public safety using best available science, they’re focusing their energy on appeasing a small constituency (houndsmen) at the risk of decreased public safety, and this small constituency requires the most administrative and enforcement overhead.

As Commissioners providing oversight, you should **oppose** this rule change, and require that the Department provide you with a plan that works within the current law, within the science, and that provides measurable criteria for success. The criteria should demonstrably relate to activities. The Department should refocus their 15-year effort to overturn the hounding ban by legislation, and now by fiat, to make

outreach plans to teach Safety in Cougar Country, Smart Husbandry in Cougar Country, and the like. Even WDFW's attitude surveys show the citizens still find hounding objectionable, except for public safety. Science shows that the current method of removing individual problem cats is the only solution (short of extirpation) to increase public safety.

Thank you,

Bob McCoy  
Sammamish, WA