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*Saving America's Lion*TM

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7 January 2008

RE: Bear and Cougar Agent Rulemaking – Implementation of HB 2971

Oregon Fish and Wildlife Commission
3406 Cherry Avenue N.E.
Salem, Oregon 97303

Dear Commissioners:

The Mountain Lion Foundation maintains its opposition to the Cougar Management Plan (Plan) because it fails to provide for long term and natural sustainability for cougars. To date, the Plan has no provisions for core habitat, linkages or independent peer-reviewed scientific management of the species designed to facilitate their highly interactive role in their ecosystem. In short, the Plan addresses methods of randomly killing cougars rather than addressing conservation of this keystone predator.

We understand that you disagree with the Foundation on this issue and understand that we must continue to address it in other arenas.

However, we are shocked by the Commission's failure to respect its own wildlife laws by proposing that wildlife law violators be made state agents. Just as we would not allow a former embezzler to volunteer as our cashier, why would we allow someone who violates wildlife law to volunteer as a wildlife agent! Frankly we cannot fathom why we should deputize an agent who has violated any law.

Please consider any violation of wildlife laws to be grounds for immediate disqualification of any current or future state agent.

Further, Oregon voters have accepted hound hunting and baiting for select removal to resolve a particular conflict. They have not accepted hound hunting and baiting for random killing. In fact, they specifically rejected hounding and baiting under those circumstances.

We urge the Commission to suspend all random removal of cougars using hound hunting and baiting pending a new vote by the electorate.

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Additionally, there is now irrefutable evidence from around the world that wildlife conflicts are best addressed by prevention. Responsible animal husbandry can dramatically reduce depredation and protect the cougars as well. Better habitat planning and corridor protection can reduce conflicts. Random killing of cougars whether or not they have ever caused a conflict does not.

We urge the Commission to work with 4-H, FFA and the Farm Bureau to employ preventive measures to reduce conflicts with cougars and other predators.

Finally, the Cougar Management Guidelines were compiled by the world's most senior cougar scientists and contain nothing upon which they did not all agree. The Guidelines represent the most basic foundation upon which to build cougar management plans and have been endorsed by the National Wildlife Federation, a well-respected national hunting, fishing and conservation organization.

We urge the Commission to at least bring the Plan into compliance with best accepted science as represented in the Cougar Management Guidelines.

In summary, we urge the Commissioner to revisit major portions of the Cougar Management Plan. We urge you to change it from a plan focused on methods to randomly kill cougars whether or not they have caused a conflict to a plan that is focused on science-based conservation.

Thank you,



Lynn Sadler
President and CEO

Cc: Hon. Ted Kulongoski, Governor
Michael Carrier, Governor's Natural Resource Director
Roy Elicker, Director ODFW
Ron Anglin, Wildlife Division, ODFW