

# MOUNTAIN LION FOUNDATION

## *Saving America's Lion*

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July 13, 2011

To: Washington Fish & Wildlife Commission  
Chairperson Wecker  
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Commissioner Jennings  
Commissioner Mahnken  
Commissioner Perry  
Commissioner Schmitt  
Commissioner Smith

Regarding: Proposed Rule Changes to WAC 232-12-243

Position: **OPPOSED**

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Dear Commission Members:

The Mountain Lion Foundation, on behalf of our Washington members, strongly opposes the proposed changes to the public safety cougar removal policies in WAC 232-12-243 for legal, scientific, and ethical reasons. The proposed changes not only violate current law, but they will put the public at an increased and unnecessary risk of a conflict with wildlife. These changes are irresponsible and should not be approved.

In effect, the proposal overturns the ban on hound hunting cougars. RCW 77.15.245 currently states the commission shall "*authorize the use of dogs only in selected areas within a game management unit to address a public safety need presented by one or more cougar.*" This policy is biologically sound; by only removing confirmed "problem" cougars with hounds, both the public and wildlife populations are protected. Using hounds to sport hunt cougars is inhumane and offers an unfair advantage to the hunter, hence this practice is *only* reserved for cases where it is necessary to ensure public safety. Washington citizens and the Legislature this last session have once again made it clear that hounds should only be used in times of absolute need.

The proposed rule revision would reclassify the public safety clause of RCW 77.15.245 into the general "cougar management" plans--which focus primarily on increasing recreational hunter opportunities rather than ensuring public safety. Conflicts would no longer need to be confirmed before a cougar could be hunted down with hounds. And even a portion of the quota in annual cougar trophy hunting seasons would now be reserved for hound hunters. The new provision allows one cougar per 130 square kilometers of habitat to be killed by hound hunters--this amounts to approximately 680 cougars annually (or more than 40% of the state's cougar population) if the stated 109 cap were to be removed. By allowing the use of hounds to target over a hundred cougars at random for slaughter every year, the proposed revision to WAC 232-12-243 is the opposite of what residents want and is a blatant violation of the law.

Recent publications by top cougar biologists in Washington discourage killing such a large portion of the adult cougars in the state. At the 10th Mountain Lion Workshop in May, and then again at a forum held by the Washington Fish & Wildlife Department on June 17, experts pointed out:

- The random shooting of cougars -- whether or not they have caused a conflict with human interests -- does nothing to make anyone or anything safer. Attempts to decrease the cougar population will not further decrease the already slim odds of an attack; and in many cases killing cougars has actually shown to put people and domestic animals at a greater risk.
- When adult cougars are killed, their now vacant territories cause a large influx of transient juveniles trying to claim the same region (known as "stacking"), and results in biologists overestimating the cougar population by 2 to 3 times.
- Transient juvenile cougars are disproportionately more likely to use human-occupied areas and get into trouble with humans. Conflicts and complaints are the highest in an area *after* a large-scale cougar removal program has taken place because the adults were wiped out and more juveniles have moved in.
- When female cougars are artificially removed from the population, up to ½ of the time that action orphans dependent kittens which are disproportionately more likely to get into trouble with humans.

In addition to violating current law and ignoring the science on cougar populations, the proposed changes to WAC 232-12-243 also mislead the public. The new policy would lead citizens to believe that the random shooting of cougars, whether or not they have caused a conflict, will in some way reduce the number of conflicts between humans and cougars. This, in turn, will focus state resources on ineffective random killing at the expense of conflict resolution methods that actually work. Further, it psychologically relieves citizens of their personal responsibility to institute proper livestock management practices which avoid attracting wildlife into situations where there can be conflicts.



PO Box 1896  
Sacramento, CA 95812  
www.mountainlion.org  
(916) 442-2666

The voters of Washington, who own the wildlife of the state under the public trust doctrine, have repeatedly demonstrated their desire to ban the hound hunting of cougars. This proposed change openly thwarts their decision and negligently puts them and their domestic animals at an increased risk for a wildlife conflict.

**For all of these reasons we oppose the proposed changes and urge you not to adopt them.**

Instead, we recommend you further protect the public by:

1. Incorporating the latest peer-reviewed cougar science by researchers from Washington State University and the University of Washington into WDFW's Cougar Management Plan.
2. Decrease sport hunting quotas to help stabilize the adult cougar population in the state.
3. Maintain the current public safety requirements for authorizing a cougar removal.

We recommend the book Cougar Management Guidelines to help you through this process. We also offer our educational tools if they can be of assistance.

Thank you,

A handwritten signature in black ink that reads "Amy Rodrigues". The signature is written in a cursive, flowing style with a large initial "A" and "R".

Amy Rodrigues  
*Outreach Coordinator*