



Board of Directors
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This document intended for inclusion into the public record. Comments submitted regarding WAC 232-28-286 and WAC 232-28-297

Dear Members of the Commission,

Greetings,

Please accept the comments of The Cougar Fund, a national organization dedicated to education about, and protection of, mountain lions and other large carnivores. We recognize the commission's interest in public safety, a priority that we most certainly share with you. **The real solution to public safety and public interests is prevention**, something that your professional staff already consistently addresses. Your staff utilize rapid and proactive response to conflict situations, integration of a successful Karelian Dog program and widespread education and outreach that acknowledges and adheres to guidelines indicated by current best science. Education about conflict prevention and appropriate surgical removal of target animals is far superior to the false security suggested by random culling (sport hunting).

The proposed rule changes are cause for great concern because they deviate from Washington Department of Fish and Wildlife's (WDFW) commitment to science based management.

Our observations and insights are as follows.

Administrative

The release of the rule change proposals was extremely hasty and largely unanticipated, providing inadequate time for interested parties to be comprehensive in their responses. WDFW invested much time and effort in preparing the Supplemental Environmental Impact Statement (SEIS) for the 2015-2021 Game Management Plan, yet there was no reference or allusion to the liberalization of predator hunting either by quota increase or season extension. This is further compounded by the highly unusual fact that Status Quo alternatives did not appear for either black bear or cougar management and indicates that WDFW administrators may have strayed from standard biological recommendations and



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document preparation. The failure to allow time for public comment together with the omission of the rule change proposals from the SEIS could be viewed as arbitrary and capricious failure to adhere to administrative standards.

Biological

In recent years the biologists of WDFW have become recognized for their conscientious observance of the findings of current best science and for adopting management protocols that reflect this. The meticulous focus on science-based management has brought widespread respect to the department and this is directly due to the quality and integrity of your wildlife biologists. This is especially true in the area of research into large carnivore behavior and the recommendation of management based on that behavior. The substance of these rule changes is in direct conflict with the practices that have commanded respect for WDFW in the scientific community. To essentially 'do a U-turn' and ignore the scientific recommendations of your wildlife biologists downgrades the professional reputation of your department and damages internal morale. Please support the dedication and tenacity of your biologists by listening to them.

It is ecologically ill advised to extend the cougar-hunting season into the time when ungulates are in their weakest physical condition and deer and elk are starting to give birth to their young. There do not appear to be any valid reasons for this rule change. **We strongly urge you to deny the request for an extended cougar-hunting season.**

The public does not easily accept spring black bear hunting and the doubling of quotas in most areas would most definitely challenge their tolerance. What is the justification? There has been no request for greater hunting pressure to be put on bears by the multi-national timber companies whose interests you are seeking to protect. In fact when contacted by my office last week, many of those companies were not aware of the prolific expansion of spring bear killing that you are proposing! **The department has failed to justify expanding spring hunting of black bears and we earnestly request that you reject this rule change.**



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Sociological

Many states are in the process of returning to the enhanced biodiversity of multi predator systems and there are numerous outreach opportunities to be addressed. Education and information based on science is the most effective way to promote integration of recovering species both onto the landscape and into the public consciousness.

Washington stands at a crossroads. Large carnivores are being managed to a large extent by the sound scientific guidelines originating from your own wildlife biologists. They are leaders in the field of conflict prevention. Is there a political tendency to regress as Washington faces the public relations challenges associated with wolf recovery? It appears that by putting unprecedented and unsubstantiated pressure on cougars and black bears you are entering into a tacit agreement with producers and ungulate hunters that you will not be soft on wolves when they revert to state control. This may be palliative, but it is not science and it is not recommended by published and peer reviewed research conducted on predator species. Which path will you take? The one pointed out by your wildlife professionals leading forward, or the dark, narrow, winding maze of history that persecutes cougars, bears and wolves?

Unfortunately the lack of time allowed by WDFW for public comment prevents comprehensive analysis of your proposed rule changes. The topics addressed are truncated yet succinct.

Please accept these remarks with the same respect with which they have been submitted and **please reject the rule changes before you.**

Sincerely,
Penelope Maldonado
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