



19 June 2024

2024 Cougar Season Setting

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C/O Washington Department of Fish and Wildlife  
Natural Resources Building  
1111 Washington St. SE  
Olympia, WA 98501

Re: 2024 Cougar Season Setting

Dear Commissioners and Director Susewind:

On behalf of Safari Club International, I would like to thank you for the opportunity to comment on the proposed changes in the 2024 Cougar Season Setting.

SCI opposes the proposed changes to WAC 220-415-100, Cougar hunting seasons and regulations. Foremost, the position of the Washington Department of Fish and Wildlife (Department) and the experts charged with sustaining these animals is diametrically opposed to the direction the Commission is attempting to go. The proposed changes are not based upon science and are purely and simply an effort to reduce hunting opportunity of cougars. Washington has an approximate cougar population of 3600 animals, 2400 of which are independent animals (not kittens). Hunters harvest approximately 8.5% of the adult aged population and 5.7% of the total population. Conflict animal removals result in approximately 115 animals or 3.1% of the population. The population has an intrinsic growth rate of 10-16% per year. Put simply, current offtake levels are appropriate for maintaining or at least slowing the growth rate of the population, and do not harm its long-term viability or sustainability.

The proposal will reduce cougar offtakes to diminish hunting opportunity and obstruct the Department's management efforts. The proposal calls for reducing the season length by 30 days, thereby reducing the effectiveness of hunter harvest. The proposal arbitrarily lowers the mortality cap from 16% to 13%. It also lowers the bar by counting adult cougars as 18 months of age instead of 24 months of age, thereby reaching the cap much more quickly, again in an attempt to limit hunting. The proposed change allows for 7% additional hunting harvest if the mortality cap of 13% is reached prior to the hunting season; however, if the mortality cap is sitting at 12% mortality in a particular unit when the hunting season opens, the accommodation would only allow 1% hunting harvest. Using 13% alone as a trigger makes no sense. Further, the additional 7% harvest allowance provision would sunset after this season. Hunters, who pay for wildlife management, are being penalized for issues with conflict cougars or vehicle strikes and the real issues underlying conflict are not being addressed.

The Department is currently managing for a stable cougar population by allowing harvest near to the intrinsic growth rate. The Commission's proposed position is to manage for an increasing cougar population by reducing hunter harvest through the use of overall mortality against the arbitrary cap percentage. Over time, the cap will simply be met by conflict or vehicle strike mortality prior to September 1<sup>st</sup> as the cougar population increases without hunter harvest. That outcome is



unacceptable, especially given Commission's mission to provide sustainable fish and wildlife recreational and commercial opportunities.

It should be noted that a cougar recently attacked a group of cyclists in Washington and another cougar also killed a young man in California in unprovoked attacks. It is important that Washington's abundant cougar population be properly managed to protect the public safety and the health of all wildlife populations. It is not appropriate for Washington's cougars to be managed by political or emotional bias. Additionally, conflict cougars will continue to be killed by government officers or agents and laid to waste, simply because some people do not like hunting. This is unfair to both hunters, and to the cougars themselves.

Sound science-based conservation involving hunting as the primary management tool is necessary to the long-term health of wildlife. Hunters have long paid the way for conservation, both game and non-game species. Maximizing opportunity for all huntable species, including cougars, is key to long-term funding for all conservation. Hunting is also the only viable management tool to control an abundant cougar population, like Washington's. Hunting benefits wildlife conservation.

Thank you again for the opportunity to comment on the 2024 Cougar Season Setting proposal. SCI is dedicated to protecting the freedom to hunt and we appreciate the partnership with the Agency and the Commission. SCI is always First For Hunters.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Laird Hamberlin". The signature is fluid and cursive, with a long horizontal stroke at the end.

W. Laird Hamberlin  
Chief Executive Officer  
Safari Club International