



Talking Points for Commission Testimony
Proposed Washington Cougar Hunting Rule
Updated June 19, 2024

I. General guidance.

- a. Always be courteous and respectful. You might thank the commissioners for the opportunity to testify and/or for their service on the commission.
- b. If you are from Washington, tell the commission where you are from.
- c. If you are not from Washington, consider describing why you are invested in the issue (i.e., member of a group like the Endangered Species Coalition, long-term Washington resident (even if you are not currently), or have a connection to this issue because...)
- d. Make it personal, if you can. You can describe how the issue affects you, how you have a connection to it, or why you care about it. Go any direction you wish, but think about how you can make your testimony and your perspective unique. Examples include talking about your connection to a particular species, an encounter you had, your relevant education or experience, your concerns about biodiversity loss, your concerns about the world your children and grandchildren live in.
- e. Use the below talking points sparingly, or not at all. They can be good reference points, but do not feel the need to cram lots of facts into your testimony, especially if you are not comfortable with them.

II. Themes. *Most are described in more length below.*

- a. Cougar mortality has exceeded the limits recommended by agency biologists for several years, especially in several management areas, where humans kill one-third to one-half of the independent-aged cougar population each year.
- b. The main question now is when the commission will correct this problem. Management and some commissioners want to wait another year, while we want the changes to take effect before another season of devastating mortality.
- c. The commission recognized this problem when it voted 7 to 2 to accept our rulemaking petition in December. Now, it just needs to follow through and approve the proposed rule that will correct these changes.
- d. The proposed rule is based on extensive agency research and biologist recommendations, who have advised that overall cougar mortality be limited to no more than the intrinsic growth rate (13% by their recent estimates) in each cougar management unit.
- e. A healthy cougar population is a vital component of a healthy ecosystem. As apex carnivores, they create trophic cascades through the ecosystems in which they live that facilitate greater biological diversity. We need healthy and resilient ecosystems if our wildlife is going to survive climate change, and the commission needs to begin to look at ecosystems holistically, rather than “managing” species in isolation.
- f. The current rule is a moderate compromise, which reduces cougar hunting to sustainable levels, but maintains hunting opportunities around the state. Feel free to say it you do not think it goes far enough.

- i. There is no need to hunt cougars at all, as they regulate their own population numbers. Cougars are hunted for recreation and primarily for hunting trophies. Humans are the leading cause of cougar mortality by far. We rarely allow cougars to live out their natural lives.
- ii. Cougar hunting does not reduce livestock predation or conflict with humans—studies suggest it might even make those problems worse.
- iii. Any level of cougar hunting disrupts the population and orphans kittens, many of whom will not survive.

III. Cougar mortality has exceeded responsible and sustainable levels for several years.

- a. Over the past five years alone, humans have killed more than 1,500 independent-aged cougars (over 18 months) in Washington, out of an estimated statewide population of about 2,000-2,200 independent-age cougars.
 - i. Biologists focus their population research and management efforts on “independent-aged” cougars, and determine growth levels and hunting quotas accordingly. You may hear inflated population numbers that count kittens, but they are difficult to count and that is not the relevant number.
 - ii. We use the cougar population estimate of 2,065, based on a 2021 paper by agency biologists.
- b. Known human-caused cougar mortality in Washington has doubled since 2011, exceeding recommended mortality levels since 2016 and maintaining record levels beginning in 2018. This sustained level of human-caused mortality carries significant risks for the state cougar population.
 - i. This includes hunting, “management” actions by state and local officials in response to livestock predations or purported public safety risks, landowner kills, poaching, and roadkill. Most cougars are killed by hunting and management actions.
- c. During the 2023-24 hunting season, humans killed 337 cougars, or about 16% of the independent-aged population. Of this number, 223 were killed by hunters.
- d. Although WDFW scientists have said that human-caused mortality in each management unit should be kept below the intrinsic growth rate (now estimated at 13%), it has regularly ranged between 20% and 50% in some areas, including Stevens and Klickitat counties.
- e. During the past four hunting seasons, humans have killed an average of more than 1/3 of the cougar population each year in 8 population management units in the state—with mortality in some years exceeding 50%.
- f. In 5 of the last 6 years, the number of cougars killed statewide each year has exceeded the intrinsic growth rate.

IV. The Commission should follow through on its 7-2 vote to accept the rulemaking petition and approve this rule before the next hunting season. There is no good reason to wait.

- a. There is no good reason to allow overhunting of cougars for one more season. The only reasons offered have been based on political considerations, not ecological needs.
- b. Allowing hunting to continue at these levels for even one more year would be reckless and irresponsible. The Commission has acknowledged that current mortality levels are

- too high, and it knows that they threaten the health and stability of the cougar population—and could even put people in danger.
- c. We do not know how much harm has been done, because we do not have a good way of measuring changes or trends in the cougar population. The commission should not wait until there is proof that they have caused irreversible harm before acting to fix this problem.
 - d. Agency staff has confirmed the science supporting the proposed rule.
 - e. This is a simple, straightforward, and modest change.
 - f. The rule change **does not** end or threaten cougar hunting in Washington. It merely reduces it to the sustainable levels set by WDFW's own scientists.

V. The proposed cougar rules are based on agency science.

- a. Foremost cougar experts have urged WDFW to change its cougar hunting rules immediately, emphasizing that current cougar hunting rules have no basis in science, and that current mortality rates could do (and might already have done) severe damage to the state cougar population.
- b. Fifty carnivore experts submitted [a letter to the Commission](#) confirming the scientific accuracy of the key points of the petition, many of which are embodied in the proposed rule.
- c. Decades of agency science have shown that the safest and most sustainable way to manage the cougar population is by ensuring that we keep mortality below growth rates in each population management unit (PMU), an approach embodied in WDFW's last Game Management Plan.
- d. In presentations earlier this year, agency scientists confirmed the accuracy of the estimated cougar population levels and the 13% growth rates on which this rule is based.
- e. There is no excuse for waiting any longer to enact a cougar management program based on the agency's own research.

VI. The Commission's mandate instructs it to manage wildlife in a way that will not "impair the resource." Its current rules with respect to cougars fail to meet that standard, and it has a responsibility to correct that course immediately.

- a. Healthy populations of cougars are vital components of healthy and resilient ecosystems. Cougars help regulate ungulate populations, provide food for other species, and protect riparian areas from overuse.
- b. WDFW must exercise caution in managing these populations to prevent long-term harms, especially in light of the compounding threats caused by climate change, habitat loss, and a global decline in biodiversity.
- c. The Commission has an obligation to the people of Washington to regulate hunting carefully and responsibly, but cougar hunting has been above sustainable levels for many years. Although department managers may assure the Commission that this excessive hunting has not damaged these populations, **the truth is that we have no idea what damage has already been done.**
- d. WDFW scientists do not have an effective way of monitoring state cougar populations that allows them to determine the impact of years of overhunting. We do not know if these levels of mortality have caused the statewide population to decline, shifted the age and sex structure of the population, or weakened the population by decreasing its genetic

diversity. Scientists are attempting to study cougars in some areas, like the Olympic Peninsula, but their efforts are being thwarted because officials are killing so many of the cougars they are studying.

VII. **Current levels of hunting hurt the cougar population.**

- a. High hunting levels increase the number of orphaned kittens. Hunting cougars inevitably orphans kittens, because kittens often do not travel with their mother and it is difficult for hunters to determine whether they are shooting a mother cougar.
- b. Cougar kittens generally stay with their mothers for 12-18 months, and they need that time to learn the hunting skills necessary to survive on their own. Young orphaned kittens will die of starvation, exposure, or predation. Older kittens will struggle to survive without well-developed hunting skills, and they are more likely to cause conflicts with humans as they search for food that is easier to obtain.
- c. Excessive hunting eliminates mature male cougars with established territories, who are crucial in helping to maintain the stability of the cougar population. Making the situation worse, many hunters deliberately seek out the biggest and healthiest cougars (usually mature males), because they make better trophies.
- d. Young male cougars immigrate into the areas where hunters have killed the dominant “trophy” males. These young cougars do not have the same territorial instincts as mature adults and may create overlapping territories—meaning that killing too many cougars may actually *increase* cougar density in local areas.
- e. This creates a chaotic structure with ill-defined and shifting cougar territories subject to constant turnover.
 - i. Scientists have likened this to killing all the adults in a town and leaving the teenagers to take over.
 - ii. Excessive hunting also devastates the female cougar population, which will ultimately lead to population decline. Female cougars do not range as far as male cougars, so there are a limited number of new females to replace those killed. An alarming decrease in female cougars may often be masked by the influx of male cougars, meaning it can take a long time for managers to detect the shift.

VIII. **Science has established that increased hunting does not reduce cougar predations on livestock or reduce conflicts with people—in fact, substantial research suggests that increased cougar mortality may lead to *more* human-cougar conflicts.**

- a. Cougar populations do not need to be hunted because they regulate their own numbers, as WDFW’s own research has shown. The only reason for cougar hunting is to give hunters the “opportunity” to kill cougars.
- b. There is a broad scientific consensus that increased hunting of cougars does not decrease predations on livestock or conflicts with humans. **In other words, scientists agree that hunting cougars does not make people, pets, or livestock safer.** This may seem counterintuitive to some members of the public, but it is WDFW’s responsibility to stand behind this science and explain it to the public.
- c. **Excessive cougar hunting may make people less safe, and there is no excuse for the Commission to take this risk.**
 - i. Over the past several years, multiple studies have shown a strong correlation between overexploitation of the cougar population and an increase in cougar-human conflicts.

- ii. Science explains why this may be true. Excessive cougar mortality eliminates adult cougars and creates a society run by cougar “teenagers,” who are more likely to frequent human-occupied areas, attack livestock, and come into conflict with humans.
- iii. Hunting orphans cougar kittens who are more likely to create conflicts as they fight to survive. Kittens orphaned before they have refined their hunting skills may not be able to kill traditional cougar prey and may search out easier sources of food, such as livestock and pets.

IX. The proposed rule will cause WDFW’s cougar hunting policy to be more ethical, ecological, and sustainable.

- a. It will count *all cougar mortality* toward hunting limits, because, as one commissioner said, “a dead cougar is a dead cougar.”
- b. It would cap hunting at 13% of the cougar population in each management unit, as managers have advised.
 - i. Management actions to kill cougars for livestock predations or human safety concerns could continue after that point.
- c. It would stop cougar hunting in April, giving cougars a rest when they have newborn kittens.