

## WDFW response to cougar and bear rule making options.

Change #	WAC	WDFW Response
1	WAC 220-415-100	Staff will be recommending a comprehensive rule review following completion of the GMP.
2	WAC 220-415-100	This is merely a calculation based on existing science. This change will increase the guidelines or quota to the previous numbers.
3	WAC 220-415-100	Including the cougar population estimate only captures an estimate from research in certain locations and is a snapshot in time. This will be a static number. This number also only considers independent-aged individuals, which will need to be denoted in the table if included. This level of detail is not appropriate for a WAC and belongs in the GMP or other internal documents.
4	WAC 220-415-100	This decision should wait until we have developed the GMP guidance and rerun the cougar model including all sources of mortality. The growth rates that are based on Washington research were calculated to estimate harvest effect on the population growth rate. Other sources of mortality were included in the calculation. The number of agency removal mortalities has increased in recent years in a few PMUs and we hope to capture this increase in the new framework. The guideline that includes all known mortality is likely to be higher than the current guideline and using 16% without recalculating could lead to double counting of mortalities. We should avoid use of the word “limit” as it may have other meanings (i.e., bag limit). We recommend the use of “quota”. We would need more resources to administer this on weekends. This change has the potential to close units before the season opens and will affect opportunity.
5	WAC 220-415-100	Removing the split season management may potentially close some units early due to opportunistic harvest during the deer and elk seasons, reducing the chances for cougar-focused hunters to pursue cougars during the winter season when snow is on the ground in some PMUs. This will also impact hunters at deer and elk camps with limited cell service. There are other ways to reach this goal – perhaps reviewing mortality weekly to give hunters more certainty.
6	WAC 220-415-100	This change reduces opportunity. There are few cougars taken during April each year, so not likely to impact harvest rates significantly.
7	WAC 220-415-100	Recommend not implementing this change at this time. Need to check on feasibility. Will require more resources to administer this on weekend harvests within 24 hours.
8	WAC 220-415-090	Staff will be recommending a comprehensive rule review following completion of the GMP.
9	WAC 220-415-090	The bag limit change will decrease some hunters’ opportunity and will not impact harvest significantly. Consider a compromise on Aug 15 to provide more opportunity.