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September 24, 2020

RE: MDNS 20-043: WDFW grazing guidance and grazing management tools

Dear Ms. Wood,

Thanks for the opportunity to provide comments on WDFW's grazing guidance and grazing management tools. Conservation Northwest is a regional conservation organization focused on protecting and connecting wildlife and wild places from the Washington Coast to the BC Rockies.

The WDFW Mission is to preserve, protect and perpetuate fish, wildlife and ecosystems, while providing sustainable fish and wildlife, recreation, and commercial opportunities. The roughly million acres of public land in 33 wildlife areas managed by WDFW provide essential fish and wildlife habitat, including for many threatened and endangered species, and First Foods and other culturally important species. WDFW lands contribute to landscape habitat connectivity with other public lands, and provide other crucial ecological services.

Overall, WDFW presents a reasonable approach to considering and authorizing grazing on Wildlife Areas. Still, there is room for improvement. For instance, the section on the role of grazing to meet WDFW mission presents grazing benefits, but nothing on potential negative effects. It comes across as a pitch, rather than a fair assessment of risks and opportunities. Addressing risks openly and evenly will improve the utility of the guidance document.

Other feedback:

Clearly define the ecological or habitat objectives for which grazing may be used as a tool, and monitor using quantifiable metrics to assess whether or not these objectives are being achieved. Establish as a condition of range use the attainment of ecological or habitat objectives, including after fire. Provide sufficient resources for regular monitoring and evaluation, and annually review and adjust plans as needed to meet ecological and wildlife habitat objectives.

Better incorporate information into management guidance about harmful impacts of fencing, especially with respect to habitat connectivity and collision hazard. Mark, modify or remove fencing interfering with wildlife recovery or habitat permeability. When building or replacing fencing, use wildlife compatible fencing.

Identify WDFW lands to hold in reserve to provide emergency pasture in case of fire or wildlife conflict. Our experience over the last decade, last six months, and last two weeks highlight the critical need to plan and prepare for emergencies. As the climate warms, weather will become more unpredictable and lands more susceptible to fire events. As the region's population grows and recreation pressures increase, it's likely that the number of human-caused fires will also increase. There are also places in Washington with persistent, ongoing conflicts with livestock or risk of conflict that could be best addressed by providing alternative range. This guidance document is the appropriate place and time to address the growing need for significant reserve lands for emergency use.

Specify more clearly the conditions for termination for non-compliance. Clear communication on the terms of the agreement will benefit all parties. The guidance document should be very clear that grazing requires active herd management and supervision, supported by monitoring and evaluation by WDFW. A checklist alone is not sufficient.

For monitoring, establish benchmark values for riparian and species-specific habitat conditions and monitor annually (not "attempt"; do!) to ensure habitat conditions exist.

We appreciate the importance and value in honoring commitments to acquisition agreements.

Thanks for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Dave Werntz". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Dave Werntz
Science and Conservation Director
Conservation Northwest
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Twisp, WA
98856