

## C-6003

## Recommendations

- Presently, the role of C-6003 with respect to WAC 220-500-200 is unclear. Was it meant to expand on WAC, even though WAC is generally more detailed and more stringent? Reiterate it? Or something else? It is problematic having two guidance documents that are not fully consistent with each other.
- We propose to:
  - Clarify and incorporate unique aspects of C-6003 into WAC 220-500-200
  - Eliminate redundant text or concepts
  - Resolve inconsistent text or concepts
- No subsequent remaining benefit from having these two documents in current form, thus the request is to rescind or modify C-6003.

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Opening Statement

*“The Washington Department of Fish and Wildlife acquires and manages land to protect fish and wildlife and their habitats, maintain biodiversity and provide opportunities for fish and wildlife related recreation.”*

- Concept not unique to grazing management.
- Does not address how grazing is managed.
- **Probably not necessary in light of subsequent existing language describing desired ecological conditions.**

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## GENERAL POLICIES statement

*“Domestic livestock grazing on Department owned or controlled lands may be permitted if determined to be consistent with desired ecological conditions for those lands, or with the Department's Strategic Plan.”*

- WAC does not include the word “domestic.”
- WAC does not distinguish between “owned or controlled lands.”
- **Should we propose adding “owned or controlled” to WAC?**
- **Otherwise, this statement is fully redundant with WAC and thus unnecessary.**

*“Livestock grazing on Department lands is a practice that can be used to manipulate vegetation for fish and wildlife, accomplish a specific habitat objective, or facilitate coordinated resource management. If permitted, livestock grazing must be integrated with other uses to ensure the protection of all resource values, the most important of which is maintaining ecological integrity.”*

- WAC does not address these concepts aside from “desired ecological conditions.”
- Difficult or impossible to manage for “all resource values.”
- **Propose moving ecological integrity and purposes of grazing to the Grazing Program Guidelines document, and approving that document prior to any Policy changes.**
- **Propose eliminating “the protection of all resource values.”**

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2.

*“Grazing permits are of agency-wide interest. The Department will develop procedures that include a cross-program review to ensure all grazing permits are subject to the best available science.”*

- First sentence is vague.
- WDFW has already developed procedures. These procedures do not necessarily require district team review of temporary permits.
- **Propose deleting first sentence, and making an exception for temporary permits in the second sentence.**

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## 3.

*“New grazing permits will be made available for Commission review before being forwarded to the Director for approval. All grazing permits, excluding temporary permits, must include a domestic livestock grazing management plan that includes a description of ecological impacts, fish and wildlife benefits, a monitoring and evaluation schedule, and a description of the desired ecological conditions.”*

- WAC requires management plans for all permits > 2 weeks, but C-6003 excludes all temporary permits (which can last up to 1 year) from that requirement. This is an inconsistency.
- Otherwise this language is entirely redundant with WAC.
- **Propose using existing WAC language, thus paragraph 3 above would be completely unnecessary.**

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4.

*“Coordinated Resource Management Plans will be encouraged where appropriate.”*

- CRM regularly occurs on a variety of permits, but not always with a formal Plan.
- “Where appropriate” is vague.
- **Propose adding to WAC but deleting the word “Plans,” and clarifying that CRM is encouraged where grazing occurs across multiple ownerships, consistent with context provided in Grazing Program Guidelines.**

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5.

*“The Department will promote adaptive management and continued improvement of programs and practices as new knowledge and understanding of habitat ecology becomes available.”*

- **No changes proposed; text would be added to WAC.**



# C-6003

- Discussion

**1 - Should C-6003 be rescinded, modified, or left alone?**

*Staff Recommendation: pull out relevant portions and add to Guidelines and/or WAC*

**2-Where is the preferred place to express WDFW's commitment to maintaining ecological integrity where grazing is permitted?**

WAC

Commission Policy

Grazing Program Guidelines

*Staff Recommendation: Grazing Program Guidelines*

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- Topics that could be addressed in a modified Commission Policy
  - Grazing has a role on WDFW lands
  - Updated reasons for grazing (to include community character)
  - Maintenance of ecological integrity
  - Consistency with fund sources