

The Mitigated Determination of Non-Significance (20-043) (MDNS) issued by WDFW addressed the SEPA checklist associated with the “Grazing Guidance and Grazing Management Plan.” WDFW is modifying the language of these mitigation measures as explained below.

Modified MDNS language.

“The proponent shall incorporate the following mitigation measures when administering grazing permits under WAC 220-500-200, Commission Policy C-6003, and internal agency guidance and tools:

- [1] Development of individual comprehensive grazing management plans, where required by rule, for each grazing permit location to assess and manage grazing risk to species and habitats
- [2] Restrict the footprint size and location in the wildlife area where grazing is permitted
- [3] Except on crossing permits lasting less than one day, limit grazing intensity (stocking rate)
- [4] Limit grazing duration/period
- [5] Where appropriate and consistent with overall permit objectives, implement rest rotation schedules where a pasture is rested (not grazed) for a year
- [6] Implement post-fire recovery periods restricting grazing after wildfire until habitat has recovered
- [7] Set conservative forage utilization levels
- [8] Monitor grazing utilization and intensity to ensure compliance to grazing management plan conditions/measures
- [9] Monitor ecological conditions to ensure that ecological integrity is maintained
- [10] Where need is identified through riparian monitoring and/or cross-program recommendation, build and maintain fencing to restrict livestock access to water and riparian habitat
- [11] Locate water troughs away from streams and riparian habitat to avoid livestock movement into these areas.”

Description of Changes and Rationale.

“The proponent shall incorporate the following mitigation measures when administering grazing permits under WAC 220-500-200, Commission Policy C-6003, and internal agency guidance and tools into the project:

- [1] Development of individual comprehensive grazing management plans, where required by rule, for each grazing permit location to assess and manage grazing risk to species and habitats
- [2] Restrict the footprint size and location in the wildlife area ~~state~~ where grazing is permitted
- [3] Except on crossing permits lasting less than one day, Limit grazing intensity (stocking rate)
- [4] Limit grazing duration/period
- [5] Where appropriate and consistent with overall permit objectives, implement rest rotation schedules where a pasture is rested (not grazed) for a year
- [6] Implement post-fire recovery periods restricting grazing after wildfire until habitat has recovered
- [7] Set conservative forage utilization levels
- [8] Monitor grazing utilization and intensity to ensure compliance to grazing management plan conditions/measures
- [9] Monitor ecological conditions to ensure that ecological integrity is maintained
- [10] Where need is identified through riparian monitoring and/or cross-program recommendation, build and maintain fencing to restrict livestock access to water and riparian habitat
- [11] Locate water troughs ~~livestock watering stations~~ away from streams and riparian habitat to avoid livestock movement into these areas.”

The proposed changes to WAC 220-500 and Commission Policy C-6003 (which align with WDFW’s current “Grazing Guidance and Grazing Management Tools”) constitute a non-project action. Individual

“tools” (e.g., grazing management plans) would be carried out in individual “project actions” (i.e., permits), when WDFW staff would evaluate how to appropriately implement the use of a particular “tool” based on the specific circumstances of an individual permit. The modified language set forth above clarifies that these measures apply at the level of individual permits. Below is additional explanation regarding the rationale for edits to each specific mitigation measures:

[1] Certain short-duration grazing permits are currently exempted by rule from including a grazing management plan. The proposed rule change would maintain a very similar exemption for permits allowing short-duration grazing (fewer than 14 days) on WDFW land. Maintaining this exemption would not lead to any probable adverse environmental impacts, and allowing for this in the mitigation measure would avoid the confusion of requiring a mitigation measure that is inconsistent with the rule.

[2] The “Grazing Guidance and Grazing Management Tools” document would apply nowhere except wildlife areas in Washington managed by WDFW, making the reference to “state” superfluous.

[3] Permits allowing livestock to cross a wildlife area for less than one day are unlikely to result in appreciable forage utilization.

[4] (No change)

[5] Rest rotation is currently required in some, but not all, WDFW grazing management plans. Rest rotation, if applicable, is included in any description of duration/period of grazing (measure #4). Some factors influencing the constraints and benefits of specific rotations include stocking rate, actual utilization history, plant community, terrain, weather, and presence/activity of native predators. For example, some deferred rotations are more sustainable on an annual basis than spring grazing in bunchgrass communities, and permits with very light utilization can be repeated more often as well. It has been environmentally beneficial in the past for WDFW permits to include some flexibility to adjust rotations in response to wolf activity and wildfire. Grazing permits should incorporate timing/rotations that weigh all of these factors to maximize ecological benefits.

[6] (No change)

[7] (No change)

[8] (No change)

[9] (No change)

[10] Many WDFW permit footprints already exclude streams and riparian areas, especially those with anadromous fish populations. A few permits do not specifically exclude riparian areas for several potential reasons. Propensity of livestock to linger in stream bottoms is much lower at certain times of year, when these areas are colder and palatable forage is more abundant in upland areas. Some riparian areas are heavily armored with rock and cobble that discourage livestock passage, and others are guarded by very steep terrain and/or dense vegetation avoided by livestock. And in other cases, brief utilization in a riparian area could itself be a permit objective. WDFW has initiated riparian monitoring on perennial streams within grazing permit footprints to inform

management. Due to separate impacts from fencing itself, development of grazing permits should weigh these factors rather than automatically requiring fence.

[11] This change is to distinguish troughs from those areas where limited stream access is available as described in [10]. It would also would not preclude the use of “armored crossings,” which protect stream banks by securely incorporating a limited amount of fill in order to facilitate a stable crossing area for when livestock might need to cross a drainage bottom.