



Washington Department of Fish and Wildlife  
Taylor Cotton  
P.O. Box 43141  
Olympia, WA 98504

RE: Conservation Northwest Comments on Draft Status Review for the Columbian White-tailed Deer:

November 18, 2022

Dear Mr. Cotton,

Conservation Northwest is grateful to be given the opportunity to provide comments for the Draft Status Review for the Columbian White-tailed Deer (CWTD). First, we are deeply concerned about how vulnerable this deer population is to the effects of extreme flooding, land use changes, and the lack of a functional connected landscape. Second, we agree that the newly established Ridgefield National Wildlife Refuge NWR subpopulation represents a significant improvement for the Columbia River population as a whole. However, the fragmentation, habitat requirements and genetic stagnation that has plagued this species makes them vulnerable to climate change. While reclassifying this species from endangered to threatened introduces a lot of uncertainty, we have decided to support Washington Department of Fish and Wildlife WDFW's proposed change. However, we have a few suggestions that we think should be prioritized when managing CWTD going forward.

In the Pacific Northwest, climate change is projected to bring shorter, winters with higher precipitation and longer, warmer summers which could lead to more extreme flooding events. Furthermore, most of Washington's CWTD populations rely on riparian habitats at or below high tide levels along the Columbia River. We have already seen severe flooding cause short term deer population declines and significant degradation of inhabited deer habitat at Mainland Julia Butler Hansen Refuge (WDFW, 2022, p. 14).

The Ridgefield NWR CWTD population is the largest subpopulation in Washington State and is the main reason why WDFW believes that the species has recovered enough to be reclassified as a threatened species. This subpopulation was established in 2013 via translocation and grew to an estimated 228 individuals by 2022. While impressive on paper, only 60% of the land used by that population is considered secure. This, plus that fact that Ridgefield NWR is not even primarily managed for the deer, concerns us greatly. It is also important to note that we do not fully understand the impacts that COVID-19 stay home orders may have had on conflicts with humans/vehicles, possibly inflating population numbers.

We have two main concerns related to land use changes. First, in the future, resource managers at Ridgefield NWR or Tenasillahe Island could decide to prioritize restoring salmon spawning habitat, which is not always supportive of CWTD needs. While salmon recovery is a fundamental priority in the state and CWTD is not, we hope WDFW has considered these



potential losses of current habitat. Second, we are concerned that the unsecure 40% of currently occupied habitat used by the Ridgefield subpopulation will be developed. The city of Ridgefield and Clark County are among some of the fastest growing in the state.

To mitigate for potential loss of habitat for the Ridgefield subpopulation, Conservation Northwest would like WDFW to expand on their success in the area by establishing a subpopulation of CWTD on the nearly 2000 acres of mostly county land near the East Fork of the Lewis River with a potential carrying capacity of 400 deer, as suggested in the CWTD Population and Habitat Assessment from 2020. While we realize this review is not a conservation or recovery plan, we feel it is important to provide context for our position, at this time.

We feel that the community and agencies need to act now to secure the future sustainability of this species, as it is still missing from a significant portion of its historic range. Translocation has been a successful tool for resource managers, but it does not generate natural gene exchange. Placing small subpopulations around the state in fragmented pockets of vulnerable riparian habitat is expensive and unsustainable in the long-term by itself. We feel that along with establishing a population at the Lewis River site mentioned above, managers and partners should prioritize the creation of a secure 5-mile habitat corridor between the county, previously mentioned and the Ridgefield NWR.

Again, we would like to thank you for the opportunity to comment on this draft.

Sincerely,

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