

Anonymous Anonymous

Please see attached.

To: Department of Ecology

Date: December 21, 2022

RE: Voluntary Clean Water Guidance chapters and/or Nonpoint Source Pollution Plan

Department of Ecology,

My name is Dawn Blake and I ranch in Lincoln county. My family has farmed and ranched for literally ever, so consider me a multi-generational rancher. In the early 1900s, my family operated the largest dairy in Washington state. Unfortunately, the orchard and ranch where I grew up was not even enough to support my parents without town jobs, so my husband and I started our own herd. Complying with the proposed best management practices included in the Voluntary Clean Water Guidance chapters; especially the grazing chapter, would decimate our ranch's viability. It would also mean property which has been in my family's stewardship since the 1800s would no longer be able to continue raising cattle.

My husband and I run a cow/calf and seedstock cattle operation with about 100 mother cows and retained yearlings. We have a home base pasture with our winter sacrifice area away from riparian areas and lease hay and rangeland, which includes over a mile of riparian area. Our landlord would not be able to afford any upgrades in fencing to riparian areas and would be forced to cancel our lease. The land would then have no steward as he is unable to care for it. We would be hard pressed to find enough pasture to lease and land is not affordable for purchase. We would not be able to afford any upgrades to the current leased ground.

We rotate the herd through sections of the rangeland and vary the dates of grazing so native grasses can seed about every two years. We try to have the cattle graze invasive plants and only spot spray with approved chemicals as a last resort. We educate ourselves on management practices through podcasts, conferences and bulletins. VCWG takes away the ability to tailor our educated response to the uniqueness of the land.

Did I miss a mention of how extensive riparian fencing would impact wildlife; especially elk and moose, which both frequent our leased rangeland? Moose have difficulty jumping fences and elk seem to make it over only about half the time without damaging the fence and themselves. We use barbless wire where possible, but deer can become entangled even in it.

How about blue tongue and the WDFW guidance to limit water areas to inhibit the spread of that disease? Having just a few water sources would surely finish off the already struggling white tail deer. Limiting water sources also makes it easier for predators to simply hang out in these areas, which increases their predation average.

GPS fencing technology is being developed and made more affordable every day. Please include this option as an acceptable fencing as a way of keeping the VCWG future proof.

Using Site Potential Tree Height (SPTH) for riparian restoration, even on a voluntary basis, ignores responsible stewardship. The proposed riparian buffer rules do not adequately consider the positive impacts of current state and federal conservation practices such as CREP, ACEP, EQIP, CRP and others including the Washington Voluntary Stewardship Program, which is not even mentioned in draft chapters and continues to be underfunded.

DOE uses a blanket science and approach that more vegetation near a stream will prevent the waterway from expanding or changing course. I believe it was March 2013 when there was a large snowfall followed the next day by melting temperatures. During this event, there was much local flooding and damage to roads. There was erosion which nothing could have stopped. One of our local creeks, not on ground we own or lease, went underground and has never returned. This was not the fault of anything agricultural as it disappears into a hole in the ground on state owned land. No amount of extra trees, nonuse, etc. would have prevented this from occurring. Throughout Spokane and Lincoln counties, all sorts of waterways changed that day.

In one area of the document, it talks about letting reforestation happen. We leased some ground a few years ago for several years. The landowners and we allowed aspens to flourish near several ponds on the property as we thought this was what was best. Unfortunately, the thirsty aspens made the ponds, which were homes to numerous bird species, turtles, snakes, frogs, and an important water source for ungulates dry up. The cattle were always supplied well water to drink, so that was not the issue. The proposal of blanket reforestation is not always the best answer.

With the recognized drought of 2021, we had a large pond which has supposedly never gone dry nearly dry up. A few days prior to the herd needing to be rotated into that piece, I counted over 100 turtles in a body of water which had shrunk from about two acres to the size less than an Olympic swimming pool. The nearest water was over half a mile away. These turtles would have surely perished if we would have let the cattle use it as a watering hole. Instead, we temporarily fenced off the pond, which was no easy task and then continued to check the fence a few times a day to ensure the cattle did not break into the area. We are attentive stewards to the land, but need situational solutions at no cost.

Grazing seasons vary so widely across the state, to have them listed is counter-productive. Even if the listing were changed to regional grazing dates, they can vary by several weeks from year to year for the same ground. Last year, the cattle were rotated more than this year and forage went unused due to the early snow and cold temperatures. There is simply too much variability to put hard grazing dates in a non-changing document.

Lastly, there must be some federal study about how many cattle operations are making money. From middle-sized herds like ours, to larger herds or the folks who only have a few animals, very few are making money, let alone a living. Everyone relies on off the farm jobs to help the ranch break even. The fencing, drilling of wells, installing water diversions, and removing productive acreage will kill the cattle industry in Washington state. The same industry which the document notes in the opening is so important to the state's economy. There is nothing more noble than providing food for people and this document will make it impossible for us to continue our operation.

Thank you for the opportunity to comment.

Sincerely,

Dawn Blake