

# Bill Blake

See attached. Great work to all those that contributed to this effort over time. I appreciate the chance to share a few comments based on my experience helping landowners achieving their stewardship goals.

thanks

Thanks for the opportunity to comment. I just want to share a few suggestions based on my experience in managing riparian areas and associated lands over the past couple of decades.

Pp10d – First paragraph – It may just help to end this paragraph about exclusion from the full Riparian Management Zone preferred.....based on the following information describing the impacts grazing has on Riparian zones. As currently written it sounds a little like an opinion, rather than a technical recommendation based on all the great citations and explanations that follow.

Pp 13d – I realize it isn't Ecology's mandate to protect wildlife, but watering in any zone can impact wildlife of all types. Especially if during reproductive or early juvenile life stage. The sooner there is a reference to the need to understand and review the WDFW considerations the better. It wouldn't be the landowners fault for causing impact to wildlife if they aren't aware of the biological dependencies of over half of Washingtons wildlife species on riparian areas.

Pp 14d - If at all possible over-flows from a livestock watering tank should go back in to the stream to maintain streamflow. If that is difficult, then at least the overflow should be released in the inner zone infiltrating in a manner that may provide late summer baseflow support.

Pp 16d - Suggest a reference to newly seeded areas needing to be established and passing the "pull test" prior to allowing grazing.

Pp17d - Just a note that Trails and Walkways should be built where livestock naturally travel from point a to point b. If you put it in the wrong place, unless fenced they will just use their original pathway.

Pp 19d – Says all stream crossing must designed and installed according to NRCS specs in FOTG 578. I don't think limiting to this design criteria allows for possible designs with greater benefit to the stream and fish. I suggest says FOTG 578 as a minimum, while allowing for designs providing greater ecological process function. Third bullet should say "is" prohibited, not "in" prohibited.

Pp21d – Again suggest a reference to needing to review WDFW riparian guidelines to avoid impacts to wildlife seasonal life stage uses for reproduction or juvenile refuge and rearing to avoid conflict. Juvenile wildlife may not be able to avoid livestock or be extirpated to lower value habitat.

Pp22d – So are the guidelines suggesting there is a fence on both the inside and outside of the outer zone to control livestock? Seems costly, while a logical recommendation. Have people actually done that before?

Pp26d – Not sure how to exclude livestock from stream when grazing inner zone? Certainly an impact to habitat, but also seasonally for spawning fish. Basically a little more clear guidance on expectations of where fencing would have to be located. Maybe graphically?

Pp33d – Happy to see reference to wildlife. Suggest a little more info highlighting life stage and juvenile inability to evade or relocate.

Pp35d – Another benefit farmers appreciate is the ability for a mature riparian area to capture flood debris keeping it from impacting their fences and fields.

PP109 – Need to list Skagit Conservation District! <https://www.skagitcd.org/>