

WASHINGTON FARM BUREAU

To: Washington Department of Ecology via: Online Comment Portal

Date: December 23, 2022

RE: Voluntary Clean Water Guidance – Chapter 10 Livestock Management-Pasture & Rangeland Grazing

The Washington Farm Bureau is the state's largest agricultural organization representing more than 49,000 member families statewide. We are a voluntary, grassroots advocacy organization representing the social and economic interests of farm and ranch families at the local, state, and national levels. We respectfully request consideration of the below recommendations on behalf of our members.

The Department of Ecology has proposed Chapter 10 – Livestock Management-Pasture & Rangeland Grazing as part of the Voluntary Clean Water Guidance for Agriculture (VCWG). As the VCWG in its entirety stands as a voluntary recommendation, the proposed language in Chapter 10 severely lacks practical application. While all farmers rely on the weather to provide critical temperatures and timing, many ranchers and livestock producers rely solely on grazing and pastureland without irrigation. Grasses and pasture grow naturally according to the sun, rain and temperature, not according to a date, month or calendar as referenced in the defined grazing seasons in Chapter 10, page 21d. Further, the recommendation of water placement in temperate areas or irrigated pastures suggests “limit(ing) the distance between grazing areas and watering locations to 250m (820 ft.) or less whenever possible” (Chapter 10, page 13d). The lack of comprehensive science is staggering. Even on a voluntary basis very few farmers would be willing to disrupt the ground to install water stations every 250m across their property no matter the size of their farm. We encourage the Department of Ecology to draft voluntary guidelines that use comprehensive science and conservation strategies already in place by other programs.

Thank you in advance for your consideration of our comments.

Sincerely,

/s/

Caleb Gwerder
Governmental Affairs Coordinator
Washington Farm Bureau