

Adams VSP Draft Work Plan – Comment Response Matrix

2017 December DRAFT

Comment matrix updated: March 13, 2018

Comment No.	Commenter	Section No.	Page No.	Comment	Proposed Response
Public Comments					
1	Lynn Olsen	2	16	<ul style="list-style-type: none"> Line 11 delete pesticides and add crop protection tools Line 12 delete fertilizers and add nutrients Line 18 should nutrients be inserted after tillage and before crop protection tools? 	Update per comment as follows: Intensive tillage can lead to loss of soil organic matter, pesticides-crop protection tools can impact beneficial soil organisms, and high concentrations of fertilizers-nutrient inhibit nitrogen fixation and stimulate nitrification (increasing toxins in the environment). However, agriculture protects lands from conversion to more intensive development, and farmers can be the County's most effective soil managers by limiting tillage, <u>nutrients</u> , and crop protection tool applications to the lowest effective level while still achieving the desired agricultural production results.
2	Lynn Olsen	3	31	Critical recharge areas, under characteristics delete pesticides and add crop protection tools and nutrients	Update per comment as follows: Most are located in areas where potential contaminants on the land surface, such as fuel, pesticide or fertilizer <u>crop protection tools, or nutrients</u> , could potentially infiltrate into public drinking water supplies. Agriculture practices can also affect the rates of recharge to aquifers.
3	Lynn Olsen	Table 3-3	36	This is no big deal, but protection is spelled projection	Revise as follow "Crop projection-protection tools."
4	Eric Pentico (WDFW)	4	42	I have an issue with page 42 of the Adams County VSP draft that highlights water impoundments as beneficial to fish and wildlife. Many impoundments, when not constructed correctly, actually create a barrier to fish passage, which would be a negative environmental impact. Many/most artificial impoundments actually reduce the amount of habitat available to fish since it blocks free passage.	Consider adding a text box next to the "Water Storage" as follows: <u>Water storage projects – that provide multiple benefits, such as improving stream flow, wetland habitat, local water supply, and allowing for fish passage consistent with fish management objectives – is another example of a practices that could be implemented within Adams County along the Cow Creek system.</u>
5	Lynn Olsen	5	54	Under objective delete chemical and add crop protection tools.	Update per comment as follows: Protect and enhance acres managed to protect shallow groundwater wells by managing <u>crop protection tool</u> chemical and nutrient input controls.
6	Lynn Olsen	5	63	Line 5 and line 11 delete chemical and add crop protection tools	Update Table 5-1 per comment as follows: <ul style="list-style-type: none"> Manage <u>crop protection tool</u>chemical and nutrient inputs
7	Eric Pentico	6	82	On page 82 of the Adams Co. Draft VSP work plan, WDFW's private lands section may be able to provide technical assistance as well on habitat improvement projects.	In Table 6-3: update per comment as follows: WDFW provides financial assistance for habitat projects that restore and/or preserve fish and wildlife habitat through funding opportunities such as the Aquatic Lands Enhancement Account (ALEA) Volunteer Cooperative Grant Program. <u>WDFW private lands biologists may also provide technical assistance on habitat improvement projects.</u>
8	Lynn Olsen	Appendix B-2	13	Under Protection/Enhancement objectives column delete fertilizer and add nutrient.	Update per comment as follows: Manage commercial <u>fertilizer-nutrient</u> over-application and resulting excess nutrient contribution to receiving waters.
9	Lynn Olsen	Appendix C	2	<ul style="list-style-type: none"> The chart on resource concerns, under the heading water quality delete pesticides and add crop protection tools in the surface water and groundwater sections Under the heading water quality- excess pathogens, delete chemicals and add nutrients from manure, and chemicals from bio-solids or compost applications in the surface and groundwater sections. 	Update per comment as follows: <ul style="list-style-type: none"> Pesticides-Crop protection tools in surface water Pesticides-Crop protection tools in groundwater Excess pathogens and <u>chemicals-nutrients</u> from manure, <u>chemicals from</u> bio-solids, or compost applications in surface water. Excess pathogens and <u>chemicals-nutrients</u> from manure, <u>chemicals from</u> bio-solids, or compost applications in groundwater.

Comment No.	Commenter	Section No.	Page No.	Comment	Proposed Response
Adams VSP Staff Suggested Edits					
10	Adams VSP staff	Table 6-1	79	State funding available to counties is anticipated to be \$220,000, instead of \$250,00 originally included in the implementation budget table.	<p>Update Table 6-1 to reflect anticipated VSP biennium budget of \$220,000.</p> <ul style="list-style-type: none"> • Education, Outreach, and Technical Assistance = \$140,000 • Monitoring, Reporting, and Adaptive Management = \$70,000 • Work Group Coordination = \$10,000 <p>Add the following language before Table 6-1:</p> <p><u>The Conservation Districts have flexibility to move resources within the budget categories during plan implementation. The highest budget priority for the work group is keeping the VSP work plan viable by meeting the protection and enhancement benchmarks of the plan. After keeping the plan viable, the next work group priority is to use funding to support and leverage implementation of as many stewardship strategies and practices as possible consistent with the VSP work plan.</u></p>
Technical Panel Comments on other Work Plans					
11	Tech Panel (comments on other Work Plans)	1 and new Appendix E		Re-enforce how RCW 36.70A.720 (1)(b) was met by clearly documenting all invitations, outreach and engagement efforts to tribes and others (agencies and stakeholders).	Add an Outreach Plan as a new Appendix E clearly describing communication to tribes and interested parties during the Work Plan development process and describe outreach during implementation. Include reference to Appendix E – Outreach Plan in Section 1.
12	Tech Panel (comments on other Work Plans)	5	50	Re-enforce how existing data and plans were incorporated per RCW 36.70A.720 (1)(a).	<p>Update last bullet on page 50 to include description and summary of goals and objectives incorporated from applicable existing plans as follows:</p> <p>Existing plans: Existing plans <u>were reviewed and incorporated where applicable to VSP and are also referenced in Tables for Goals 1 through 5 where applicable to identified goals. The following plans identify goals, objectives, and strategies that are included in the Work Plan, as described below.</u> See Appendix D for additional discussion on review of applicable data and plans as a part of the process for establishing measurable benchmarks and associated indicators.</p> <ul style="list-style-type: none"> • <u>Palouse Watershed Plan (HDR/EES, Inc. 2007). This plan provides guidance for protecting water resources in WRIA 34 for out-of-stream uses, critical habitat, and recreational opportunities. Recommendations for implementing water conservation and efficiency strategies and protecting surface and groundwater quality are included with the goal of improving critical habitat and maintaining healthy drinking water. This plan also focuses on a basin-wide strategy to restore floodplain, riparian, and wetland capacities to increase aquifer recharge, provide habitat, and improve water quality</u> • <u>Palouse Basin Ground Water Management Plan (Palouse Basin Aquifer Committee 2015). This plan addresses the declining groundwater table and water supply concerns within the Palouse Basin through limiting annual aquifer pumping rates, promoting public outreach for key water conservation strategies, and maintaining water quality in the basin.</u> • <u>WRIA 43 Upper Crab/Wilson Creek Watershed Plan (WRIA 43 Watershed Planning Unit 2006) and WRIA 43 Upper Crab/Wilson Creek Detailed Implementation Plan (WRIA 43 Water Resource Management Group, Inc. 2008). These plans promote watershed-level protection of water resources and land management to protect water quality and promote water and habitat conservation efforts. Recommendations related to agricultural activities include conservation of fish and wildlife habitat and riparian vegetation, and voluntary restoration efforts. The plans identify strategies to reduce runoff impacts to help protect water quality functions of critical areas. Irrigation water management practices are also identified to conserve water resources and improve groundwater infiltration, providing filtration and recharge of groundwater resources.</u> • <u>Palouse River Chlorinated Pesticide and polychlorinated biphenyl (PCB) Total Maximum Daily Load (TMDL): Water Quality Improvement Report and Implementation Plan (Ecology 2007). This plan reviews TMDL data in the Palouse River basin and details an implementation plan to bring the river into compliance with water quality standards. Agriculture implementation strategies include continuing to reduce erosion in the watershed with BMPs like direct seed and runoff management.</u> • <u>Shrub-steppe and Grassland Restoration Manual for the Columbia River Basin (Benson et. al 2011). This manual provides guidance for meeting unique habitat requirements of grassland and shrub-steppe areas by maintaining vegetative cover. The manual gives general site preparation principles including weed reduction control, along with guidance on appropriate seed mixes to meet wildlife-specific management goals. Maintaining quality vegetative cover is a benefit to each of the critical areas and incorporated as stewardship practices throughout the Work Plan.</u>

Comment No.	Commenter	Section No.	Page No.	Comment	Proposed Response
					<ul style="list-style-type: none"> • <u>Management Recommendations for Washington’s Priority Habitats: Riparian (Knutson & Naef 1997)</u>. This plan includes recommendations to protect riparian habitat areas and the associated functions to hold and filter sediment, nutrients, and other crop protection tools and provide cover and foraging habitat. Recommendations related to agricultural activities to protect these functions include techniques that minimize soil erosion and protecting riparian vegetation through managed grazing in order to maintain vegetation and woody cover and protect riparian vegetation. Riparian health is a driving force for the habitat functions of every critical area. • <u>Washington State Recovery Plan for the Greater Sage Grouse (Stinson et. al 2004)</u>. This plan describes the life history and habitat requirements for the greater sage-grouse and recommends population and habitat recovery and conservation strategies. Strategies include minimizing disturbing activities within one and a half miles of sage-grouse leks during the breeding season, prescribed grazing to minimize the presence of livestock in sensitive sage-brush areas, minimizing the runoff from crop protection tools, managing nutrients, and maintaining native vegetation cover when possible. These strategies benefit critical area functions by providing habitat, supporting water quality functions, and maintaining more vegetative cover benefits soil functions and erosion reduction consistent with the key stewardship practices identified in the Work Plan. <p>Update Goal tables 1 through 5: revise right column title to “<u>Consistency with Existing Plans</u>”</p>
13	Tech Panel (comments on other Work Plans)	5.1		Re-enforce how the Work Plan meets RCW 36.70A.720 (1)(c) which requires goals for participation by agricultural producers to meet benchmarks.	<p>Consider adding specific outreach goals such as committing to reaching out to 10% of the County’s producers, which could change as a part of the adaptive management program. Percentage could also change based on available funding. See new Appendix E: VSP Outreach Plan for discussion. Add discussion that indicator data shortfalls will be acknowledged as a part of reporting and measures to address any shortfalls will be part of the adaptive management process. Add discussion page 66, after 2nd paragraph:</p> <ul style="list-style-type: none"> • Add discussion page 66, after 2nd paragraph: <u>Indicator data for the County is limited and not always directly applicable to the evaluation of program performance. Where data is insufficient (including where data sample sizes are small relative to data variability), it will be acknowledged as part of reporting, and adaptive management measures described later in Section will be applied as part of implementation to address these data shortfalls where necessary.</u> • Add discussion page 70, at the end of page: <u>As noted above, indicators data for the County is limited and not always directly connected to direct evaluation of program performance. Where data is limited, adaptive management measures described in this section will be applied as part of implementation to address these data shortfalls where necessary.</u>
14	Tech Panel (comments on other Work Plans)	5	66; Table 5-5	Add wetland data to monitoring methods for aquatic habitat.	Add the following additional data to monitoring methods for wetlands in Section 5 (Indicators, page 66) and Table 5-5: U.S. Department of Agriculture Natural Resources Inventory monitoring results and the National Wetland Inventory through U.S. Fish and Wildlife Service

Comment No.	Commenter	Section No.	Page No.	Comment	Proposed Response
15	Tech Panel (comments on other Work Plans)	6	81	<p>Add discussion on how critical areas how presence of critical areas on agricultural lands will be documented through farm stewardship plans and implementation.</p>	<p>Revise as follows: Adams CD will prepare biennial work plans that incorporate public-sector activities to be implemented to achieve VSP outreach and technical assistance objectives, and identify plans for working with the private sector to capture information about practices put in place <u>and presence of critical areas</u> through its efforts.</p> <p>Add Self-Assessment Checklist Protocol flowchart (Fig. 6-1) to Section 6 and Appendix E: Outreach Plan: <u>Figure 6-1 provides a protocol on how the VSP Checklist (Appendix E) will be used and illustrates the process from outreach to implementation.</u></p> <div data-bbox="2268 379 2735 1713"> <p>Figure 6-1</p> <pre> graph TD Outreach[Outreach] --> Contact[Interested Individuals Contact VSP Coordinator] Contact --> Info[Additional Information/Site Visit] Info --> Participate[Individual Decides to Participate in VSP] Participate --> Checklist[Complete Checklist with Individual] Checklist --> Participation[VSP Participation] Participation --> Implementation[Implementation] </pre> <p>Outreach</p> <ul style="list-style-type: none"> • Newsletter • Phone Call • Grower Meeting • Other <p>Interested Individuals Contact VSP Coordinator</p> <p>Additional Information/Site Visit</p> <ul style="list-style-type: none"> • Identify potential presence of critical areas • Discuss key functions of critical areas • Provide VSP checklist to landowner • Identify stewardship strategies and practices associated with: <ul style="list-style-type: none"> - Protecting critical area functions on the individual's property and on a watershed-scale - Promoting viability of the farm or ranch <p>Individual Decides to Participate in VSP</p> <p>Complete Checklist with Individual</p> <p>Discuss with individual:</p> <ul style="list-style-type: none"> • Current stewardship strategies and practices being implemented • Stewardship strategies and practices that could be implemented • Financial assistance options • Production goals for property <p>VSP Participation</p> <p>Implementation</p> <ul style="list-style-type: none"> • Obtain current stewardship strategies and practices data from landowners • Create individual stewardship plan • Identify cost-share for protection/enhancement activities as appropriate <p>Note: the VSP checklist is not a self-certification process (i.e., it is not considered an individual stewardship plan by itself).</p> </div>