

# Whitman VSP Draft Work Plan – Comment Response Matrix

December 2016 DRAFT

Comment matrix updated 2/23/2017

Comment No.	Section No.	Page No.	Line No.	Comment	Proposed Response
1		iv		EQIP is Incentives not Improvements – Environmental Quality Incentives Program	Revise as noted
2		v		Add after “Funded by Conservation Commission” as directed by the Washington State Legislature	Revise as noted
3	1			Need to discuss implementation up front in the introduction including who will be the implementer and how actions will be documented Also note that trust relationship need to be built between the implementer and participants. This should be used for communication	Revise as noted; update following decision by WG on how implementation will be led
4	1	1	15-18	Green box on right. Need to add clarification that critical areas on ag lands does not include any structures or agricultural ditching in regulated floodplains. That is covered by the County Critical Areas Ordinance.	Revise as noted
5	1.1	2	37-38	Suggest deleting “(such as federal wetland protections and state hydraulic project approvals)”. Seems unnecessary to call those examples out.	Revise as noted
6	1.1	2	46-47	The reason to maintain NRCS practice standard is give the landowner a guide to follow so their project will have a good chance of maintaining a high standard of either construction or method to accomplish the goal of protection.	Comment noted
7	1.1	2-3		FAQs: Need to be clear about what happens if VSP fails. There is currently a lot of language about the program being voluntary WG members are afraid that not enough people will participate	Revise as noted
8	1.1	2-3		FAQs Add questions: - Why should I participate/what does participation look like? (language encouraging participation) - Is there funding to support VSP? - Who is implementing Whitman VSP Work Plan?	Revise as noted
9	1.2	4	87	Farming <u>and ranching are</u> vital	Revise as noted
10	1.2	4	89	DELETE that may be impacted by farming... put a period after functions.	Revise as noted
11	1.2	4	100	Replace by with <u>for...</u>	Revise as noted
12	1.2	4	102	I would switch outreach and participation...you need outreach before you can have participation...	Revise as noted
13	1.4	5	117	It would be nice to state some of the agencies willing to be called “other technical providers” such as the Whitman County Cattlemen’s Association, The Whitman County Farm Bureau, The Whitman County Wheat Grower’s Association, etc. Organization’s that producers are familiar with and can feel comfortable approaching even if ultimately they end up at the CD, NRCS, or FSA.	Revise as noted Also, include call out to these other technical providers in Section 4.
14	2.1	7	155	Erosion concern in Work Plan should be focused on where erosion is occurring at higher risk than natural factors. i.e., erosion is already a risk factor in County, Work Plan should address activities that increase this risk (or decrease through stewardship practices).	Revise as noted
15	2.2	8	Table 2-1	Use hogs and pigs	Revise as noted
16	2.2	8	184 Table 2-1	In Primary Crops/Livestock column. - After Wheat add <u>(spring/fall)...</u> - After Brassicas add <u>(canola/mustard) and delete Canola below...</u> - Add <u>Alfalfa</u> in irrigated row...	Revise as noted
17				Consider replacing the use of the term “Frequently Flooded Areas (FFA)” with “floodplains”	Identify as FFA at first use per CAO, noting the term “floodplains” will be used as the common term throughout Work Plan

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18	3	12		Inset box: The picture is not of Palouse Prairie; it is a picture of our place which was a wheat field 2 years earlier and a homesteader's wood lot. Go to the Palouse Prairie Foundation website and select either of 2 options labelled "Palouse prairie poster;" use any of the color photos and attribute it to Allison Meyer. Also, native prairie remnants are found and being documented throughout the county.	Update photo per comment
19	3	12		Palouse Prairie VSP doesn't deal with "historic conditions" anywhere else that I can see and I can't find anything in the RCW that indicate that we should be addressing the issue. In addition, I don't feel that this is the appropriate place for this in the work plan document, and do not feel it should be color-blocked and separate. I feel it should be under 4.2, Changes since 2011 Baseline". Although it could be considered baseline and/or existing, significant CD funding, surveying, research and mapping have been done since 2011. In addition, I believe that PCD hired a botanist to work specifically on the Palouse Prairie Remnants project. It should be a part of "Conservation District-led Projects.	Revise as noted; Move this to CD-led projects and add information on the Palouse Prairie Remnants projects.
20	3.2			Baseline (2011) Since this is at the very beginning of the document I think in this one case we should tell the reader: Baseline (as of July 22, 2011)	Revise as noted
21	3.2	14	253	Is the sentence beginning with "Although..." a complete sentence?	Revise to correct typo
22	3.2	16		Inset: Characteristics>Riparian Vegetation: I would also add trees	Revise as noted; noting that many riparian areas within the County are characterized by only grasses and shrubs
23	3.2	16	295	Add to Characteristics of riparian vegetation: channeled scablands	Revise as noted
24	3.2	16	295	In the Streams and Riparian Areas on Ag Lands table: Streams: There are no Endangered Species Act (ESA)-listed salmon odds or other listed aquatic species upstream of Palouse Falls on the Palouse River.  Please revise 2nd paragraph to the following: The native species of fish in WRIA 34 are warm water fish. Resident fish species upstream of the falls include rainbow trout, brown trout, and smallmouth bass which are introduced species. There are also sculpin, large-scale sucker, northern pikeminnow, redbreast shiner, and speckled dace which are native species.	Revise as noted
25	3.2	17		Inset: Under General locations/distribution: Priority habitats include shrub-steppe (such as sage brush and Palouse Prairie) and are found throughout the county. Priority species include mainly mammals and birds. Under Intersections...: strike "adjacent to rangelands." Under Characteristics: Palouse Prairie remnants are found throughout the county.	Revise as noted
26	3.2	20	337	The majority of moderate water erosion areas are within dryland agricultural areas. The majority of severe to very severe water erosion areas are within rangelands, with some on dryland agricultural lands. This does not make sense, The Highly Erodible Soils in Whitman County are not in rangeland but originates off of the cropped hill slopes which cover the majority of the County. 77.3% as per your data. Why range land as moderate soil erosion, there is little soil remaining after the Missoula Floods in the preponderance of rangeland.	Characterize that the more severe water erosion potential areas mapped in the County are steep slope areas on the cropped hills and canyons where the majority of the soils have been stripped away by geologic events. Range activity may not exacerbate erosion risks in these areas.
27	3.2	20	337	Call out box: WG concurred that ag structures on agricultural lands would be regulated and reviewed under the traditional CAO	
28	3.3			Make clear the difference between soil loss and soil health. If soil does not leave the farm it should not be under the purview of VSP. This will help to not alienate conventional farmers	<b>Further WG discussion needed</b> Consider terms: Soil conservation, soil processes or sustainability, sedimentation, soil movement, soil attributes Provide a couple different name options and then definition of what this means

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29	3.3			Need to be more overt about the crosswalk between critical areas, functions and values, and conservation practices	We are working on developing a stronger cross-walk in Work Plan
30	3.3			Remove soil health as a function because there are things that agriculture cannot control (to be discussed at the next meeting)	Further WG discussion needed (see comment 28)
31	3.3	21	363-369	The language regarding "fecal coliform" should not separate livestock from the other contributors which are just as prevalent in the equation as livestock including wildlife and small city waste water treatment facilities (which are rarely in compliance). The verbiage does so in this paragraph. The fact that DOE has tested for fecal coliform bacteria doesn't really give credence to the facts. Most fecal coliform bacteria are harmless to humans and I don't believe that DOE does DNA testing therefore wouldn't "bacteria harmful to humans" be a more succinct description?	Broaden discussion as noted
32	3.3	21	367	However, fertilizer, sediment, and toxin inputs are also associated with paved or turfed landscapes, and septic systems also contribute to fecal coliform issue. I challenge you to provide data that states the majority of sediment that create the sediment plume that can be seen in the Snake River originates in paved or turfed landscapes and septic systems	Revise to provide clarity on the amount of sediment, and toxin inputs that are associated with paved or turfed landscapes
33	3.3	22	385	Soil is the base for all agricultural activities, so I personally would keep it as a prime function. A term less provocative might be soil attributes.	Further WG discussion needed (see comment 28)
34	3.3	22	398	Common fish and wildlife species in Whitman County:  There are no salmon above the Palouse Falls in WRIA 34. In about June 2015 the state dumped over 200,000 steelhead into Rock Lake because the Tribes on West side didn't want hatchery fish comingling with wild salmon stock. Trout and bass are also introduced species in WRIA 34	Revise as noted
35	3.3	23		Inset Table 3-3: I think that soil health is a key function for all the critical areas as it holds water, filters impurities, etc. and amend the following individual critical areas insets accordingly.	Noted
36	3.3	23	424	Table 3-3 is different between the two versions you sent out, I like report version with more dots on row for GHA's	Revise as noted
37	4			Use term "stewardship strategies and practices" in place of "conservation practices"	Revise per discussion at 2/2 meeting
38	4.2			I'm bothered by the feeling of "selectiveness" on labeling entities/programs. There has been discussion with different producers, agencies, groups, etc. regarding the lack of one place that they could find a listing of programs available, at least, from local agencies. Most of those programs don't change with the exception of funding amounts so this might be a good area to expand the program list in more detail.  In addition, the inclusion of WSU Extension Rangeland Specialist Tip Hudson's Self-Assessment Document and Check List as well as DOE's Self-Assessment Document.	See comment 13  Revise as noted: Add a subheading in Section 4.2 to discuss "Other Programs and Projects"
39	4.2	31	560-568	This paragraph starts fine but then goes into a commercial for the RCPP. I believe that all programs offer incentives to participants and that no specific program should be "pushed" by putting in extra verbiage. It should read: Figure 4-1 provides.....-a total of approximately 125,000 acres. In addition, The NRCS RCPP program provides additional opportunity within WRIA 34 for increased conservation practices incentives but is not included in Figure 4-1.	Revise as noted – move information specific to RCPP to Appendix E
40	4.2	31	563	Additionally, NRCS recently awarded \$11 million in funds during the next 5 years to the Palouse Watershed Regional Conservation Partnership Program (RCPP) through the 2014 Farm Bill.  This is an erroneous statement, NRCS funded 5.5 million in funds during the time period, the conservation commission, Dept of Ecology, conservation districts and other entities provide the additional 5.5 million.	Revise as noted
41	5			Add a textbox stating that there are changes that may occur in the county that are the result of things outside of the county - Including watercourses that start outside of the county Use indicator data to determine what is happening outside of the county	Revise to add clarity about what information indicators can provide

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42	5.2	36	665	Rate of discontinuation of practices (recidivism) is likely in the 3% to 7% range; look at change in CRP acres as an indicator of high recidivism rate	Revise to add information about recidivism/disenrollment rates and indicate that CRP acres would have high recidivism
43	5.2	36	667-669	So the bench mark will set a number for producer participation so that "additional enrollment" can be measured? Will "recidivism" be applied to that also? Can you explain CPPE more to the committee now?	Revise to add information on how CPPE will be used to set benchmarks. Add clarity on how the protection benchmark will be calculated
44	5.2	37-45		On what basis are the 2021 and 2026 benchmarks derived for all 4 functions?	Revise to add information on how CPPE will be used to set benchmarks.
45	5.2	37	677	We are just now starting to use bank stabilization as a tool for water quality in Whitman County. Perhaps, where appropriate we could add that to the "Key Conservation Practices in Whitman County".	Revise as noted
46	5.2			Revise goal statements as follows: Maintain or improve surface water quality through <u>continuing and new</u> implementation of key conservation practices that...	Revise as noted
47	5.2			Include discussion of the following additional stewardship activities as key practices where related to goals: <ul style="list-style-type: none"> <li>o Weed management</li> <li>o Black summer fallow</li> <li>o Residue management (40% or greater)</li> </ul>	Revise as noted
48	5.2	37	677	Replace "heat" with "temperature"	Revise as noted
49	5.2	38		I STRONGLY suggest that in the first row of boxes (and anywhere else I may have missed, like p. 39 last box on the right) that we put "fencing" at the bottom of the key conservation practices list as it is an extreme hot button in this county among producers.	Revise as noted
50	6			Identify who is currently doing monitoring	Revise as noted
51	6			WSU is leading the Water Erosion Prediction Project (WEPP) which is a hydrological characterization model to predict runoff and erosion. The model is being applied to the Palouse watershed (WRIA 34) for the RCPP. WEPP may help identify future stewardship actions to address erosion.	Follow up to determine if this tool is effective for implementation
52	6.1	49	758	You list CD's but no other agencies, I think we should give a more detailed list of those willing to help.	See comment 13
53	6.2	50	789	More comprehensive list-WCCA, WCFB, WCWG, etc. This document needs to not look like it is CD led or we will not get as much participation as we would like, it just a fact.	See comment 13
54	6.2	50	794	De-emphasize the role of "farm stewardship plans" in the Work Plan	Revise as noted
55	6.2	762		WG would like County to recommend implementation lead to WG.  VSP coordinator job description could be limited to: <ul style="list-style-type: none"> <li>• Collecting participation data from existing conservation program leads and entities (e.g., NRCS, CDs, WSCC, Ecology, Cattleman's Association, Wheat Grower's Association); and</li> <li>• Relying on existing agencies to provide the technical assistance to producers</li> </ul>	Work Group recognized that selection of a VSP coordinator is the responsibility of Whitman County as the administer of funding. Whitman County will determine if an existing organization, new hire, or contractor would be best to serve this role.
56	6.4	54	860	Comprehensive list [of private sector and not-for-profit programs] again please.	See comment 13
57	6.5	56	919	WRIA 34 encompasses 100 per cent of the Palouse Rock Lake Conservation District and 90 plus per cent of Pine Creek Conservation district. There nowhere in Palouse Rock Lake Conservation District or Pine Creek districts that are in WRIA 56	Revise as noted
58				Request the Palouse Watershed Management Areas be included and/or referenced in the Work Plan Vol. 1 or 2	Palouse Watershed Management Areas will be referenced in the Technical Appendices