

# Whitman VSP Draft Work Plan – Comment Response Matrix

2017 June DRAFT

Comment matrix updated: 6/15/2017

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed
1	Joan Folwell	Global			Change the term "prairie" where ever it is used in the text and qualify it as "Palouse Prairie." That is the only type of prairie found in Whitman County.	Revise as noted	
2	Kim Weerts	1	1	12-15	Bold or underline " <b>to protect and voluntarily enhance critical areas in areas where agricultural activities are conducted, while maintaining and enhancing the long-term viability of agriculture.</b> "	Revise as noted	
3	Kim Weerts	1	1	20-23	If this specific verbiage is not in the checklist, it should. This is good!	Replace in Overview and Checklist – page 1, 2nd paragraph: "VSP is allowed under a 2011 amendment to the Growth Management Act, with the intent to protect and voluntarily enhance critical areas in areas where agricultural activities are conducted, while maintaining and enhancing the long-term viability of agriculture. VSP allows farmers and ranchers to continue agricultural practices without regulation under Whitman County's Critical Areas Ordinance. By promoting voluntary stewardship strategies and practices, VSP provides an alternative to traditional approaches to critical areas protection, such as protection buffers."	
4	Kim Weerts	1.2.2	5	83	Green box Sect. 1: instead of VSP regulation use VSP legislation.	Revise as noted	
5	Kim Weerts	1.2.2	5	83	Green box Sect. 4: Instead of conservation practices use stewardship	Revise as noted	
6	Kim Weerts	1.3	6	Table 1-1	Identify WSCC (spell out)	Ok as is. WSCC is defined in table notes	
7	Tracy Eriksen	2.1.3	9	148	In the narrative associated with the erosion pic, the second sentence needs to looked at. Unless things have changed in the last decade, the high rainfall region of Whitman County does not have the highest level of erosion, —because they traditionally annual crop. The highest erosion is associated with the lower rainfall areas where fallow is part of the traditional crop rotation. Fallow is devastating to soil., even chemical fallow.	Replace second sentence with: "Erosion risk can be higher in lower precipitation areas where fallow lands are a part of the traditional crop rotations."	
8	Jason Kunz - WDFW	2.3	12	221	Please work with Alan to see if the last sentence should start with 'On-going'. There is something about when Ag land and ditching that has been idle (not actively worked) for over 5-years means there could be CAO and other regulator conditions if the area has reverted back to wetland.	Revise as noted "Ongoing maintenance of these existing drainage ditches is accounted for as part of the 2011 baseline conditions. "	
9	Kim Weerts	2.3.2	15	253-260	Additions should be made to add: failed septic systems or lack of septic systems, gravel roads. Take out "fecal coliform" and add rodents under bacteria and wildlife. Livestock may cause bacteria issues but let's also add the rest of above but this is "selective verbiage"!!	Add to sentence on line 255: "...such as small municipal wastewater facilities, <u>failed septic systems or lack of septic systems, paved, gravel, and turfed areas...</u> " Add to line 258: "...bacteria from livestock, rodents, and wildlife (e.g., fecal coliform) ..."	
10	Kim Weerts	2.3.2	15	254	After temperature, add in parentheses (temperature may exceed state standards, however, native species of fish are warm water.)	See comment #17 from WDFW. Suggest adding the following language in parentheses: "... ( temperature may exceed state standards; however, many native species in the County are adapted to warm water conditions or tolerate a wide range of temperatures)..."	Y
11	Kim Weerts	2.3.2	16	276-279	I don't believe this is necessary (surface water source limitations). I don't remember talking about this.	<b>Discuss with Work Group.</b> This was added in response to a prior WDFW comment.	Y
12	Art Swannack	2.3.2	17	297	Add the words "in some plant species" after "nitrogen fixation"	Revise as noted	
13	Kim Weerts	3	20	341-343	Remove 1st sentence of paragraph - contributes nothing	Revise as noted	
14	Kim Weerts	3	20	346	Add: before and since 2011.	Revise as noted	
15	Jason Kunz - WDFW	3	20	350	Due to recent reporting of some significant Riparian Impacts off Max_Hatley Road, I wonder if the work group should discuss whether or not the VSP work plan should make a statement about such changes to baseline conditions will need to be accounted for. The CAO does exclaim how impacts to established Riparian vegetation shall by avoided unless specific to current/on-going Ag-activities.	<b>Discuss with Work Group.</b> See Section 5.3, lines 946 – 958, for discussion on habitat indicators.	Y
16	Jason Kunz - WDFW	3.1	22	396	Is the last sentence needed? Streams that only flow once or twice in a decade would be considered more of a "wash" and washes really don't have any habitat function or value. I think you cover it by just saying intermittent streams.	Suggest keeping as is. Added per Work Group discussion to help further describe the characterization of some of the "Unknown" stream types currently mapped by DNR.	

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17	Jason Kunz - WDFW	3.1.2.1	25	433	2nd bullet in table and 2nd sentence "The native species of fish in WRIA 34 (Palouse) are warm-water" is not necessarily accurate. Native minnows thrive in water temps from 59 to 68 degrees, but have adapted to survive seasonal warm temps up to 80 degrees. Also WRIA 34 has cool-water species of rainbow and small-mouth bass. Suggest removing the citation and rewording to say, "There are no Endangered Species Act-listed salmonids or other listed aquatic species upstream of Palouse Falls on the Palouse River. Resident fish species introduced upstream of the Palouse Falls include rainbow trout, brown trout, and smallmouth bass. Native species upstream of the Palouse Falls include sculpin, large-scale sucker, northern pikeminnow, redbreast sunfish, and speckled dace."	Suggest revising as noted, with the following addition: "There are no Endangered Species Act-listed salmonids or other listed aquatic species upstream of Palouse Falls on the Palouse River. Resident fish species introduced upstream of the Palouse Falls include rainbow trout, brown trout, and smallmouth bass. Native species upstream of the Palouse Falls <u>which are adapted to warm water conditions or tolerate a wide range of temperatures</u> include sculpin, large-scale sucker, northern pikeminnow, redbreast sunfish, and speckled dace."	
18	Art Swannack	3.1.2.1	25	433	"Native species in WRIA 34 are warm water fish" Should have footnote to supporting the documentation as I expect it will get challenged by WDFW.	See response to comment #17.	
19	Kim Weerts	3.1.5	29	Gr box	Under general locations/distribution; bullet 2: "The Palouse... if we're going to document work done on river to alleviate flooding we should talk about all projects not just Colfax, ie. Elberton Levees	Broaden bullet 2 to read: "There are levee systems within the County to alleviate river flooding such as the levee system through the City of Colfax along the North Fork, South Fork, and mainstem of the Palouse River, and other levees."	
20	Kim Weerts	3.2	31	517	Stewardship instead of conservation	Revise as noted	
21	Tracy Eriksen	3.2	32	534-535	Degraded soil health through water and wind erosion, should be added to "threats" column. This is backed by statements made in lines 513-518.	Revise as noted. Add "Degraded soil health through water and wind erosion" as an agricultural viability threat.	
22	Kim Weerts	4	33	554-555	Remove the btw discusses and stewardship and the btw highlighting and protections	Revise as noted. "Additionally, this section discusses <del>the</del> stewardship strategies and practices that have been implemented since 2011, highlighting <del>the</del> protections..."	
23	Kim Weerts	4-1	35	Table	We should be using "managed grazing" thru out document instead of prescribed	Suggest ok when referencing the NRCS practice.  Revise "Prescribed Grazing" to "Managed Grazing" as noted where discussed more generally. Revise in Section 5 where we identify prescribed grazing as a key practice.	
24	Art Swannack	Table 4.1	36	Top	Table has no stewardship strategy example or applicability statement present in left 2 columns. Not sure what going for in "harvest to improve plant communities and manage weeds". Is this a continuation of prescribed grazing or is this a statement on haying?	Fix formatting so row content stays on same page	
25	Kim Weerts	4.2	37	588	Take out likely. After protected add "and/or" instead of just or.	Revise as noted. "...that have <del>likely</del> protected <u>and/or</u> enhanced critical area functions and improved agricultural viability over baseline conditions."	
26	Art Swannack	4-2	37-38	601 and table	Reversion from prescribed grazing to no managed grazing is highly unlikely and I don't see it as being a high risk. Managed grazing is done in some form by most producers, whether intensive or moderate. Just leaving animals in one pasture all year (not prescribed grazing) is uncommon.	Suggest ok as is. Prescribed grazing was identified in the "high" category based more on the higher variability of implementation year to year, not due to discontinuation.	
27	Joan Folwell	4.2.2	41	673 + inset box	2nd paragraph: The remnants of the Palouse Prairie are located primarily in the eastern two thirds of the County. Strike the next sentence, but maintain the last sentence about the inventory. The last paragraph: One of the biggest threats to the Palouse Prairie is the continued fragmentation into small remnants which allows for easy the invasion and replacement by introduced species, such as cheat grass and Canada thistle.	Revise as noted	
28	Art Swannack	4.2.3	42	705	After "production" add "and the economic viability of local businesses which support agricultural operations"	Revise as noted	
29	Kim Weerts	5	43	720	After voluntary add "and" before incentive.	Revise as noted	
30	Tracy Eriksen	5.1	45	770	Tables 5-1 through 5-5: Protection and Enhancement Goals – I struggle with correlating "key functions —> xxx functions". A more understandable label needs to be found (I don't have one to offer).	Remove "functions" after wetland and all critical area goal tables. Key functions → to wetland	
31	Jason Kunz - WDFW	5.1	45	770	Goal # 1 for existing plans, please cite PHS (1997 or as updated) Please do this throughout the Work Plan as this document is currently being revised/improved.	Revise as noted	
32	Art Swannack	5.2.1	53	811	Need to spell out what CPPE acronym stands for	Suggest ok as is. Acronym is defined at first use on page 44.	
33	Kim Weerts	5.2.2	55	858	Is "as-5" supposed to be partially in yellow?	This should be the default black font. Change yellow font color to black.	

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34	Kim Weerts	5.2.2	55	Text Box	Add 4th bullet for "managed rotational grazing"	Revise as noted			
35	Kim Weerts	5.3	59	909	there's an extra "s"	Revise as noted			
36	Art Swannack	5.3	59-60		Indicators: There is no mention of indicators for Ag viability. This is a glaring omission. It seems economic prosperity should be referred to in some manner as an indicator of how farms are doing economically during VSP implementation. It would also aide as an indicator if VSP implementation is going slowly due to tough economic times. Some ideas for an indicator include: - Whitman County net farm income per WSDA agricultural survey/USDA-NAS/WSU agricultural economic survey or the USDA census of agriculture. - Other potential indicator parameters might be dollars per lbs/bushel/ton received from the local grain prices or livestock prices compared to historic levels. - And one final idea which could be the most viable indicator is the County Assessor's open space property taxable valuation calculations done via County Assessor's office. They use a 10 year rolling average of costs of production and amount of crop produced to sell (yield). Landowners are mandated to report this each year (costs of fertilizer, average yield, etc...) These are then applied to the class of ground (I believe class 1-top farm ground to class 5-rock pasture but you should ask assessor) and the taxable value of the ground in a parcel is then calculated. It would indicate whether farming is increasing or decreasing in value which is a rough correlation with profitability over the long term and could correlate with viability.	<p><b>Discuss with Work Group.</b></p> <p>Consider adding agricultural viability indicators per comment, as summarized below:</p> <ul style="list-style-type: none"> <li>• <b>Suggested agricultural viability indicators</b> include tracking economic survey data from sources such as the WSDA, USDA, or WSU: <ul style="list-style-type: none"> <li>○ Annual agricultural crop product sales and economic value</li> <li>○ Net farmer income</li> <li>○ Market prices for agricultural product per unit</li> <li>○ Assessed property valuation changes based on reported valuation calculations per County Assessor's Office (profitability indicator)</li> <li>○ <b>Others?? Work Group help complete list</b></li> </ul> </li> </ul>	Y		
37	Kim Weerts	5.3	60	947-953	I don't believe this verbiage should be in document. This is a "maybe in the future" use. We don't talk about any other possible tools we may use. This is pushy and an advertisement for something WDFW is trying to sell.	Revise to read: "PHS and other GIS mapping and analysis information available in the County for habitat assessment."			
38	Kim Weerts	5.4	61		Add verbiage where talking about tracking to include tracking weather conditions, air temperature and other pertinent surrounding indicators.	Revise as noted. Add row to Table 5-8: <table border="1" data-bbox="1911 997 2564 1088"> <tr> <td>Additional Monitoring Data</td> <td>Track climate data such as precipitation and temperature data through PRISM Spatial Climate Datasets</td> </tr> </table>	Additional Monitoring Data	Track climate data such as precipitation and temperature data through PRISM Spatial Climate Datasets	
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39	Tracy Eriksen	6.1	68	1063	Conservation Districts have been dealing with this since the 1930's, with low participation over that period of time. All the help would be appreciated to get more participation.	<b>Discuss with Work Group.</b> Feedback has been to avoid calling special attention to the role of Conservation Districts in the Work Plan.	Y		
40	Kim Weerts	6.1	68	1067	Stewardship activities instead of conservation	Revise as noted			
41	Kim Weerts	6.1	68	1075	Remove "either" and "existing organization"	Revise as noted			
42	Kim Weerts	6.1	69	table	Should say "VSP coordinator with help from technical asst. providers"	Revise as noted in the "Who" column			
43	Kim Weerts	6.2	70	1119	Take out the word tracked	Revise as noted			
44	Kim Weerts	6.2	71-72	table	Add WSU Extension in each box	Revise as noted			
45	Kim Weerts	6.4	75	1205	Take out "have the potential" and replace "with adversely"	Suggest keeping as is. Some regulations would be triggered based on the potential to affect environment. All triggered permit activities may not necessarily have an adverse effect.			
46	Kim Weerts	6.4	75	1207	Take out "with the potential to affect" and add "that adversely"	See response to comment #45			
47	Art Swannack	Appendix B2 watershed analysis	6	4 <sup>th</sup> dot	Change "manage commercial fertilizer over-application" to "discourage commercial fertilizer over-application" We aren't regulatory so program is not "managing" anything.	Revise as noted			
48	Art Swannack	Appendix B2 watershed analysis	10	3 <sup>rd</sup> dot	Same comment as above	Revise as noted in comment number 47			
49	Art Swannack	Appendix B2 community planning area	3	Table 5 PHS data	Note 3 is incomplete regarding Palouse earthworm location. Same statement for all 3 B2 appendix sub groups (rock creek/Palouse/snake river).	Fix formatting to show entire note, which should read: "There are no known or mapped occurrences of Giant Palouse Earthworm on private agricultural lands. Mapped occurrences are within public lands."  Revisit all footnotes in GIS summary tables (App B-2 and B-4) to confirm full text of notes are shown.			

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50	Art Swannack	Appendix B2 community planning area			Page numbering is confusing. Also title of section is "Attachment 1 watershed analysis units: GIS Data Summary Tables". Then there is later another "Attachment 1 CPPE scores". That is confusing when you have an attachment 1 between B1 and B2 and another Attachment 1 later in the document.	Update formatting for appendices attachments and page numbering: <ul style="list-style-type: none"> <li>Add appendix number to beginning of attachment titles: E.g., Appendix B-2: Attachment 1</li> <li>Update page numbers so each attachment has continued numbering</li> </ul>	
51	Art Swannack	Appendix B2 community planning area	Pg 3	Table 5	The numbering system of pages doesn't work. Your current system restarts numbers within a section depending on unit (rock creek/Palouse/snake river) and anyone reading this would get lost when looking back. I'd suggest numbering each appendix sequentially in its entirety for main plan. On appendices number Appendix B pages B1, B2, etc... and same for Appendix C—C1, C2 etc... If you have an attachment, it should be page numbered to the appendix it belongs in (B1A1). Some of the printing of notes in later appendices didn't come out completely correct. Don't know if printer error or document error.	Update page numbering per comment.	