

Ferry VSP Draft Work Plan – Comment Response Matrix

Draft Work Plan – Working Draft

Comment matrix updated: 2/19/2018

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
1	Dec. 18, 2017 Work Group Meeting	1	2	31	Consider adding clear definition of agricultural structures and ditches that are included in VSP/SMP agricultural definition (RCW 90.58.065 (2) (a) and (c)).	Added a "What are considered "agricultural structures" under VSP?" section using the following structures defined in RCW 90.58.065 (2) (c): "Agricultural equipment" and "agricultural facilities" includes, but is not limited to: (i) The following used in agricultural operations: Equipment; machinery; constructed shelters, buildings, and ponds; fences; upland finfish rearing facilities; water diversion, withdrawal, conveyance, and use equipment and facilities including but not limited to pumps, pipes, tapes, canals, ditches, and drains; (ii) corridors and facilities for transporting personnel, livestock, and equipment to, from, and within agricultural lands; (iii) farm residences and associated equipment, lands, and facilities; and (iv) roadside stands and on-farm markets for marketing fruit or vegetables
2	Nov. 20, 2017 Work Group Meeting	2	-	-	Planning units: Use "Watershed Areas" instead of "Community Areas"	Updated to "Watershed Areas"
3	Nov. 20, 2017 Work Group Meeting	2.1.1	-	-	Look further into WRIA 51 to see whether to include in County's Work Plan. Work Group discussed that 99% of WRIA 51 is in Whatcom County with barely any agricultural activities occurring within the County portions. – Verify whether any lands within WRIA 51 have any fee lands – mostly tribal trust lands.	Included discussion in Section 2.1.1. See Work Plan footnote #1.
4	Nov. 20, 2017 Work Group Meeting	2.1.3	-	-	Land ownership: confirm public and private land acreages. Work Group discussed estimate that 22% of land in County is privately owned and 78% is publicly owned or within the Colville Reservation.	See Table 2-1 for updated numbers more consistent with Work Group comments.
5	Nov. 20, 2017 Work Group Meeting	2.1.4	-	-	Confirm range versus cropped lands. Confirm how dryland cover was determined. Range and dryland landcover can overlap, depending on the year the data was summarized (use at time of aerial imagery).	No edits required. There were small acreages of land included likely related to hobby farms and will not affect the Work Plan goals and benchmarks.
6	Dec. 18, 2017 Work Group Meeting	2.1.4	11	215	Land management in forested rangelands <ul style="list-style-type: none"> • Make clear that practices such as forest stand improvements that are permitted under Forest Practices are not considered under VSP. However, timber-related practices specific to agricultural and range management purposes will be included in the VSP Work Plan. • Instead of using term Forest Stand Management – use the term "Understory management to maintain grazing conditions" 	Included discussion in Section 2.1.4. Additional discussion need with Work Group to review how forest understory management practices will be addressed in the Work Plan
7	Nov. 20, 2017 Work Group Meeting	2.1.4	-	-	Need to define private timber lands which are also grazed.	Included discussion in Section 2.1.4.
8	Nov. 20, 2017 Work Group Meeting	2.1.4	-	-	Review Assessor's data for acreage included in the Hancock land; 8 to 10 corporations own that land and could account for up to a third or more of the private land in the County.	Data obtained and review in progress.

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
9	Dec. 18, 2017 Work Group Meeting	2.2	12	236	<p>The VSP Work Group identified the following major resource and agricultural viability concerns in the County:</p> <ul style="list-style-type: none"> - Erosion occurring off summer wildfire areas: <ul style="list-style-type: none"> • Primarily poses risks to crop lands and range lands where access may be blocked to grazing animals - Maintaining summer grazing on public lands - Wolf predation - Maintaining water rights - Flooding 	<p>Added callout text box on Streambank Erosion and Landslides, including discussion on how wildfires contribute and exacerbate erosion and landslide events.</p> <p>Other concerns were included in Table 3-4: Agricultural Viability Strengths, Weaknesses, Opportunities, and Threats Analysis.</p>
10	Dec. 18, 2017 Work Group Meeting	2.3.1	13	250	<p>The VSP Work Group discussed whether any activities, such as structures, should continue to be reviewed under the County's Critical Areas Ordinance</p> <ul style="list-style-type: none"> - See Mason County example for expedited BP process for agricultural structures - There are lots of barns in the County next to the edge of a shoreline or wetland, and perhaps a hybrid approach is needed? <p>The Work Group requested a briefing by Mary Kalinowski, Planning Directory, on how existing structures are regulated in the County's CAO.</p>	See response to Comment #11.
11	Jan. 22, 2018 Work Group Meeting	2.3.1	13	250	<p>Following review of how existing structures are management under the County's CAO, it was determined that existing agricultural structures can be repaired or replaced if maintaining similar scope and size of original structures and the structure does not extend further waterward of the existing structure. The Work Group discussed keeping review of agricultural structures under the County's Critical Areas Ordinance.</p>	Section 2.3.1 includes language consistent with Work Group direction.
12	Dec. 18, 2017 Work Group Meeting	3	17	307	<p>The VSP Work Plan will use the following term when reference stewardship activities:</p> <ul style="list-style-type: none"> - Stewardship Plans - Stewardship strategies and practices 	Updated.
13	Sandy Dotts – WDFW	3.1	18	336	<p>The Baseline (2011) and Existing Conditions discuss with regard to Fish and Wildlife Habitat Conservation Areas (FWHCAs) is a bit complicated with respect to the high percentage of the county being mapped in WDFW's Priority Habitats and Species (PHS) database as winter range for game species. Winter range for ungulates (primarily white-tailed deer, mule deer, and bighorn sheep) are important Fish and Wildlife Conservation Areas in Ferry County, and, as the Draft Work Plan points out (Table 3-1), cover a large percentage of the county's agricultural and range lands. The PHS maps for deer winter range have generally not been updated since the 1990s. Since then, WDFW and others (Henderson 2014, Kallstrom 2009) have undertaken a number of studies to track the movements of deer to gain a better understanding of winter range use and resource selection. We have learned that agricultural fields/pasture and riparian areas are particularly important winter range for white-tailed deer. We are in the process of updating the deer winter range maps for NE Washington based on this new data, but the updated maps may not be completed before the Work Plan is finalized. In the interim, I offer the following general guidance to help refine the distribution of winter range FWHCAs for deer in Ferry County.</p>	<p>Suggest adding to footnote 2 of Table 3-1: PHS data is in the process of being updated to provide more accurately reflect mapping of deer habitat within Ferry County</p> <p>Updated in Section 3.1.2 for Priority Habitats and Species locations and characteristics text box:</p> <ul style="list-style-type: none"> • Deer species, including white-tail deer, range include agricultural fields and pastures and riparian areas in the northern portions of the County while mule deer are generally within the shrub, grass-forb, Ponderosa pine and Douglas-fir cover types on southeastern and southwestern areas of the County • Large areas of bird habitat, primarily bald eagle and some waterfowl habitat, are located mostly in river valleys and near Curlew Lake

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
					<p>1. In NE Washington, resident (i.e., non-migratory) white-tailed deer have a high probability of using pasture (i.e., agricultural fields) and riparian habitats in winter; migrant deer have a high probability of using riparian habitats in the winter.</p> <p>2. Snow depth and winter severity play a role in where white-tailed deer spend the winter, but 75% of the time they are found below 2,660 ft elevation.</p> <p>3. Mule deer have the highest probability of using shrub, grass-forb, Ponderosa pine and Douglas-fir cover types on southeastern and southwestern aspects within the elevation range of 2590-3550 ft during the winter in Ferry County.</p> <p>If winter range for deer, particularly white-tailed deer, is viewed through this lens, the overlap of Agricultural Lands with FWHCA's might be underestimated in Table 3-1.</p>	
14	Sandy Dotts – WDFW	3.1.2	21	392	<p>The green box on Page 21 is somewhat misleading. It provides a list of “common fish and wildlife species and habitats” in Ferry County. Many of the species listed are, in fact, not common, but very rare – bull trout, northern goshawk, lynx. If this box is meant to summarize the Fish and Wildlife Habitat Conservation Areas found in Ferry County, I suggest that the following FWCA's are most common: bald eagle, aspen stands, cliffs, eastside steppe, golden eagle, white-tailed deer, mule deer, snags/logs, waterfowl concentrations.</p>	<p>Update to list below:</p> <p>Common fish and wildlife species in Ferry County include:</p> <ul style="list-style-type: none"> • Bald Eagle • Golden Eagle • White-tailed Deer • Mule Deer • Waterfowl Concentrations <p>Common fish and wildlife habitats in Ferry County Include:</p> <ul style="list-style-type: none"> • Aspen Stands • Cliffs • Eastside Steppe • Snags/Logs <p>Bull and rainbow trout habitat is present in County.</p>
15	Sandy Dotts – WDFW	3.1.2	21	406	<p>What is the source for the stream data provided at the bottom of Page 21 (Lines 406-413)?</p>	<p>WDNR Streams and River Data (2015) All data sources will be summarized in Appendix B-1.</p>
16	Sandy Dotts – WDFW	3.1.2	22	414	<p>It may be worth noting the important contribution of riparian habitat for wintering white-tail deer in the Table “Streams and Riparian on Agricultural Lands in Ferry County” under “Riparian Vegetation”.</p>	<p>See response to Comment #13</p>
17	Sandy Dotts – WDFW	3.1.2	23	419	<p>Under the discussion of Priority Habitats and Species and intersection on agricultural lands (Lines 419-432), as noted earlier, if riparian and agricultural fields/pastures are included as FWHCA for deer winter range the percentage of overlap with agricultural lands may be higher than 1 %.</p>	<p>Comment noted.</p> <p>The green box titled “Game Species in Priority Habitat and Species (PHS)” on page 19 notes that game species areas that overlap with existing agricultural lands are not the primary protection focus for this Work Plan, and are thus excluded from the calculation of intersections. Riparian areas are included in the intersection calculations.</p>
18	Sandy Dotts – WDFW	3.1.2	23	429	<p>In this same section, lynx is noted as the “most prevalent PHS species in the County”. Suitable lynx habitat is mapped in PHS as a large area covering most of the Kettle Crest and Vulcan</p>	<p>Added text after line 432:</p>

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
					Mountain above 4,000 ft in elevation. Lynx occurrence however is very rare in Ferry County, making this statement misleading.	<ul style="list-style-type: none"> While suitable lynx habitat is mapped in large areas in the County above the 4,000 foot elevation range, occurrences are quite rare.
19	Sandy Dotts – WDFW	3.1.2	23	417	Figure 3-3 indicates that the map was created using 2014 PHS data. More recent PHS data for Ferry County is available. See https://wdfw.wa.gov/conservation/phs/maps_data/ to request data.	Updated data and summary calculations throughout Work Plan using 2018 PHS data. New data primarily added mapped Bald eagle habitat in the Curlew River valley area.
20	Nov. 20, 2017 Work Group Meeting	3.1.5	-	-	Work Group discussed keeping wind erosion data and maps in the Work Plan and to include discussion that it is not a big concern in the County.	Updated text as follows: GHAs can primarily impact soil erosion risk from wind and water. In Ferry County, designated erosion hazards are associated with development; however, water and wind erosion hazards will be discussed as part of the Work Plan due although to their <u>there is little</u> potential <u>for</u> impact on agricultural viability <u>outside the risks for landslides</u> .
21	Nov. 20, 2017 Work Group Meeting	4	-	-	Nutrient management is not a large concern in the County.	Comment noted.
22	Nov. 20, 2017 Work Group Meeting	4	-	-	Timber management strategies should be included in the Work Plan for practices that promote agricultural viability and to help manage Douglas Fir Bark Beetle and associated wildfires threats.	Included in Section 4.2 text box: Forest Understory Management to Maintain Grazing Conditions
23	Jan. 22, 2018 Work Group Meeting	5	-	-	Fencing should not be considered just by describing linear feet or miles of fencing but also by associated benefits based on the fencing purpose(s).	Removed fencing from goals and benchmarks as the related functional protections/enhancements from fencing are covered under other practices such as prescribed grazing and shoreline protection.
24	Jan. 22, 2018 Work Group Meeting	5	-	-	It's important to consider that there is very little private land in the County where VSP applies. This should be considered when establishing available lands for implementation when setting goals/benchmarks.	Comment noted and the enhancement goals are based on historic participation, minus the practices counted to overcome estimated discontinuation of practices.
25	Nov. 20, 2017 and Jan. 22, 2018 Work Group Meeting	5.4	-	-	Work Plan should consider that a lot of activities (such as forest practices related to logging activities) occurs upstream of agricultural lands and the streams and adjacent agricultural lands are affected by this upstream activity, which is outside the scope of VSP. One major problem is the water quality coming out of Canada and off of the U.S. Forest Service land, which is something producers can't control. It will be important to note this in the Work Plan.	Included in Section 5.4 in text box titled: Changes to Baseline Conditions – Areas Outside of VSP Scope
26	Tech Panel (comments on other Work Plans)	5.1			Re-enforce how existing data and plans were incorporated per RCW 36.70A.720 (1)(a).	Added summary of specific goals and objectives incorporated from existing plans. Include this summary in Section 5.1.
27	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.	Work Group to discuss 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.
28	Tech Panel (comments on	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).	This is clearly documented in Appendix E: Outreach Plan

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
	other Work Plans)	Outreach Plan				