

BENTON COUNTY VOLUNTARY STEWARDSHIP PROGRAM WORK PLAN CHAPTERS, COMMENTS, STATUS

March 2017

Table 1. Work Plan Chapter, Comments, Outstanding Information and Questions

Chapter	Comment Summary
0. Executive Summary	<ul style="list-style-type: none"> ▪ None. To be prepared with next full document.
1. Introduction	<ul style="list-style-type: none"> ▪ Update/correct work group list (Tapteil Vineyard Winery – add) ▪ Amend definition of Fish and Wildlife Habitat Conservation Areas to original definitions in GMA and remove “when salmonids are no longer present” as it does not appear there; plus, note the broadness of GMA definition. ▪ Agree with wetland definition but understand that wetlands created from non-wetland sites are excluded. ▪ Clarify difference in protection and enhancement under VSP and consequences. ¹ Avoid having the weakest goals possible to avoid failure, and ensure a robust plan that will protect and enhance both critical areas and agriculture. ▪ p.1, second paragraph – delete “including” in the “including fish and wildlife habitat...” because that list summarizes all of the critical areas we’ll be looking at.
2. County Profile	<ul style="list-style-type: none"> ▪ Stream ordering is useful to show differing magnitude, but does not seem useful to determining flow. Do not include mapping of irrigation delivery systems/infrastructure to match State definition of Fish and Wildlife Habitat Conservation Areas. ▪ Other critical areas context discussion could probably be expanded, save for the discussion on wetlands, and frequently flooded areas, which are effective as written. ▪ “Lower Yakima River Geology and Hydrology.” It should be noted that watershed hydrology, in addition to snowmelt, is also impacted by reservoir storage and releases, and irrigation diversions and return flows. ▪ Remove reference to fall Chinook salmon since they are not federally listed in the Yakima River. ▪ “Large-scale Watershed Alterations.” I would add that there are six major diversion dams associated with the Yakima Project on the Yakima River.

¹ Consultant clarification: The Work Plan must address both protection and enhancement goals and benchmarks. Failure to meet protection goals and benchmarks means that an adaptive management plan is required at the 5-year mark and if the failure continues at the 10-year mark means that the work plan fails and regulations are required. In contrast, if enhancement goals and benchmarks are not met, additional voluntary actions must be identified along with funding. Such enhancement goals and benchmarks are not the test for plan failure in the same way as protection goals and benchmarks.

Chapter	Comment Summary
	<ul style="list-style-type: none"> ▪ Mention landslides – they have been a problem in Franklin County – how about in Benton County? ▪ Would like a clarification of how much of the county is high quality shrub-steppe habitat and how much is moderately disturbed. ▪ Request that an Appendix be created to reflect all of the state listed species, state candidates for listing, and state sensitive and monitored species that occur in Benton County. ▪ Building a Work Plan that recognizes the value of habitat conservation for species that are not yet listed could prevent those species from needing listing in the future. ▪ Breakdown land in the unincorporated areas of Benton County by ownership, mainly privately-owned, state-owned, and federally-owned lands. ▪ p. 2, third paragraph – prefer that “salmon rearing” be changed to “salmon breeding”
3. Agricultural Context	<ul style="list-style-type: none"> ▪ Reference all AVAs, not just Red Mountain. ▪ Clarify language regarding fish screens at irrigation diversions. ▪ Second bullet under Section 3.3: This bullet could be more strongly worded to reflect the reality that increased development is a challenge for achieving the agriculture and conservation goals of the VSP. ▪ p. 6 – confirm this is a photo of hops field. ▪ Footnote 13 is missing in my version ▪ p. 9, second paragraph, clarify that customers looking for products to buy.
4. Background Information, Other Plans and Regulations	<ul style="list-style-type: none"> ▪ Upland Species – There was discussion at the workgroup meeting of removing the gray wolf from mention in the program document. ▪ HPA permits are not required for any work done in irrigation district drains and wasteways.
5. Baseline Conditions	<ul style="list-style-type: none"> ▪ Add to conservation measures – Red Mountain AVA Pump Project ▪ Questions on PHS mapping and acre statistics – do they include habitat in irrigation drains and wasteways? ▪ Questions about new irrigated acreages and whether it included Red Mountain AVA. ▪ Questions about Appendix Table: Intersect of Agricultural Activities and Priority Habitats and Species in 2011. Regarding wetlands – does it include irrigation wetlands? Northern goshawk – is this a single occurrence as county does not appear to have habitat? Brown trout are non-native, not aware they are priority. Surprised that largemouth bass is a priority species, especially in the Yakima River. ▪ Other text clarifications.
6. Technical Assistance	<ul style="list-style-type: none"> ▪ Regarding lead and supporting provider: that having BCD as the lead and WSU as the supporting assistant would suffice. ▪ Correct: <ul style="list-style-type: none"> ○ Tupteal Greenway Association ○ Irrigation Districts (Sunnyside Valley, Roza, Kennewick)

Chapter	Comment Summary
	<ul style="list-style-type: none"> ○ Columbia-Snake River Irrigators <u>Association</u> ■ Add to sources of specialty assistance: <ul style="list-style-type: none"> ○ WSDA: has technical expertise in many areas, including pesticide use and regulation ○ WDNR: has technical expertise through the Natural Heritage Program. ○ Trout Unlimited ○ Rocky Mountain Elk Foundation ○ Lower Columbia Audubon Society ■ Benton County Water Conservancy Board – is not part of Ecology
7. Measurable Benchmarks	<ul style="list-style-type: none"> ■ See detailed track changes in Chapter 7 and associated documents provided for January, February, and March 2017 meetings.
8. Monitoring	<ul style="list-style-type: none"> ■ Rework Technical Assistance Tracking Tool in coordination with Benton CD¹ ■ Suggest BCD best choice to evaluate tracking tool output. ■ BCD to draft annual report, to be reviewed by VSP working group. ■ BCD to conduct mapping; field monitoring of all critical area types not just fish and wildlife. <ul style="list-style-type: none"> ○ There could be a voluntary subgroup of the VSP with expertise in these areas; although tasks that require considerable financial resources would depend on state funding. ■ Include onsite visit in Type E monitoring where feasible/applicable. ■
9. Plan Approval Process and Timeline	<ul style="list-style-type: none"> ■ Consultants will modify to distinguish between dates associated with Conservation Commission contract versus statutory dates.
10. Definitions	<ul style="list-style-type: none"> ■ Regarding Functions and Values: [Wetland values are] “wetland processes, characteristics, or attributes that are considered to benefit society.” We would like to see the benefit to wildlife explicitly included as a benefit to society.
Appendices	<ul style="list-style-type: none"> ■ Appendix: Existing Regulations and Voluntary Programs. Clarify exemption for drainage features in RCW 77.55.011(1). Drains, wasteways, and other irrigation features are included in this exemption, especially in formerly dry washes that only have consistent flow and aquatic habitat due to the operations of the irrigation district. ■ Benton Stewardship Checklist. Full checklist prepared for BCD. Short checklist prepared and under review – see March 2017 Work Group packet. ■ Adaptive Management Matrix. January 2017 version will be revised based on comments on Chapter 7.

¹ The tracking tool has not yet been prepared, and based on a meeting with BCD will be designed to dovetail with work plan benchmarks and WSDA agricultural mapping where feasible. The Consultant team has contacted WSDA and has proposed an approach to develop a more seamless tool for tracking between field entry to mapping. This effort would begin in April.