

Form Name: TP 5-Year Review & Evaluation Comments
Submission Time: March 29, 2021 1:53 pm
Browser: Firefox 87.0 / Windows
IP Address: 165.151.214.179
Unique ID: 785290910
Location: 47.037899017334, -122.90070343018

Please indicate which TP member is filling out this form Commission

Please indicate the nature of these comments These comments are my final comments made after consideration of the written comments made by the other TP members

Please select the county five-year report under review Pend Oreille

Please choose whether you agree, partly agree, or disagree with the assertion of the county work group that it is (or is not) meeting the work plan's protection and enhancement goals and benchmarks Partly agree

Explanation Clear that numerous BMPs have been implemented to protect critical area function and value. Values were not reported differently for each watershed so cannot tell if all watersheds are equally protected.

Any other comments not captured above

- Benchmarks that "offset identified agricultural degradation" don't show how degradation was measured, so can't tell if new work was sufficient.
- some benchmarks reported exactly the same accomplishment as another. Hard to tell if second benchmark was meaningful or how it differed from the first.
- Metrics reported don't always follow the structure of the metric. e.g. "Protect and/or enhance acres managed to: protect shallow groundwater wells by managing chemical and nutrient input controls; promote natural groundwater filtration functions; improve water conservation" does not report practices that manage chemicals and N/P input, practices that promote infiltration, and practices that improve water conservation.
- some monitoring well reported (groundwater); others not well reported (PHS change). No information reported for data accuracy and very small change reported. Cannot tell if the change is meaningful.
- flow gauge monitoring could not detect impacts from agriculture, yet no adaptive management is offered. is the monitoring worth continuing or is adaptive management needed to find or collect data that is meaningful?

Please consider providing a 2-3 sentence summary of your overall comments on the five-year report. This summary will be included in the director's decision letter to the county.

Its clear that BMP implementation is occurring to protect critical area functions and values. The report needs more clarity to link practices to outcomes and identify how much is being done in which watershed. Monitoring needs tightened up so that conclusions are backed up by the data.

Email

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Form Name: TP 5-Year Review & Evaluation Comments
Submission Time: March 29, 2021 3:58 pm
Browser: Chrome 89.0.4389.90 / Windows
IP Address: 198.99.101.248
Unique ID: 785341672
Location: 47.037899017334, -122.90070343018

Please indicate which TP member is filling out this form Fish & Wildlife

Please indicate the nature of these comments These comments are my final comments made after consideration of the written comments made by the other TP members

Please select the county five-year report under review Pend Oreille

Please choose whether you agree, partly agree, or disagree with the assertion of the county work group that it is (or is not) meeting the work plan's protection and enhancement goals and benchmarks Partly agree

Explanation

We are pleased to see that the Work Group has implemented a wide variety of projects focused on numerous stewardship practices. We also commend their diverse monitoring program. Our regional staff have expressed that VSP in Pend Oreille County seems to be functioning well and is supported by strong leadership. Unfortunately, limitations in the information provided in the 5-year report left the Washington Department of Fish & Wildlife (WDFW) unable to fully agree with the Work Group's assertions that all protection and enhancement goals and benchmarks were met. Specifically, in our VSP Technical Panel role, WDFW wanted to see more information in the 5-year report about:

- 1) The types of practices/projects implemented,
- 2) The benefits they provide to specific critical area types, and
- 3) Which habitats and/or species (or groups of species-e.g., songbirds, deer/elk) are impacted, and how.

With this in mind, we summarize some of our concerns below.

With a few exceptions, the same information was reported between each goal and watershed. Since the reported accomplishments were not broken down by practice, but rather provided across broad stewardship practices, it was difficult to understand what specific actions were taken and how they led to the protection of individual critical areas.

Further, the Work Group did not report their accomplishments at a watershed-scale. We recognize that the approved Work Plan includes countywide benchmarks, but because of this, it was difficult to evaluate the level of implementation (and therefore, protection) that occurred between participating VSP watersheds.

Finally, there were a few areas in the Work Group's monitoring results we would have liked further elaboration. For example, the Work Group noted 500 acres of habitat loss, but did not describe what type of habitat were lost and where. Additionally, it was difficult to interpret the results of the 303(d) listings and groundwater quality data without knowing which watersheds/waterbodies these impairments occurred in, the severity/type of impairments (i.e. agricultural indicators), if/how these listings are connected to agriculture, and if the Work Group is using VSP implementation to address areas of concern.

Any other comments not captured above

Even though WDFW's Technical Panel comments highlight a few areas of concern, our regional staff believe much of the information we wanted to see in the 5-year report itself is available, and so can be incorporated into future 5-year reports. WDFW appreciates the opportunities that we have had to engage with the Work Group and looks forward to working collaboratively to provide ongoing technical assistance. We offer a few suggested examples below.

We noted that several watersheds are forested and occur in a small portion of the county. We are interested in learning more about how engaged the Work Group is in each watershed and if the Work Group is collaborating with neighboring counties that intersect those watersheds. Additionally, to better understand the conditions in each watershed, WDFW recommends that the monitoring data, where appropriate, be reported by watershed in the future.

We are also interested in working with the Work Group to identify opportunities to expand water quality/quantity monitoring in the tributaries of the Pend Oreille River. As the Work Group noted, because the Pend Oreille River and surrounding lakes are large systems, it is difficult to analyze the impacts of agriculture on the mainstem of the river. Evaluating system-level responses in the tributaries would provide a stronger link to VSP implementation efforts.

Please consider providing a 2-3 sentence summary of your overall comments on the five-year report. This summary will be included in the director's decision letter to the county.

The Washington Department of Fish & Wildlife (WDFW) is encouraged to learn that the Pend Oreille County VSP Work Group has made great strides implementing farm-friendly conservation projects and promoting producer participation in VSP. WDFW's decision to partly agree is not intended to discredit the great work occurring in the region, but simply highlights the fact that important contextual information was missing in the 5-year report. This information is very important for enabling WDFW, in our role on the VSP Statewide Technical Panel, to feel confident about validating the outcomes of the Work Group's implementation efforts to protect and enhance critical areas.

Email

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Form Name: TP 5-Year Review & Evaluation Comments
Submission Time: March 29, 2021 4:17 pm
Browser: Chrome 89.0.4389.90 / Windows
IP Address: 165.151.215.45
Unique ID: 785348224
Location: 47.037899017334, -122.90070343018

Please indicate which TP member is filling out this form Ecology

Please indicate the nature of these comments These comments are my final comments made after consideration of the written comments made by the other TP members

Please select the county five-year report under review Pend Oreille

Please choose whether you agree, partly agree, or disagree with the assertion of the county work group that it is (or is not) meeting the work plan's protection and enhancement goals and benchmarks Partly agree

Explanation

We partly agree that the county has met their goals and benchmarks. We note that the goals and benchmarks were reported on in a way that was easy to interpret the NRCS data and what has been implemented to date. Reporting management practice groupings under the critical area in which the practices provide the greatest protection and enhancement helps gauge the effect of the practices. We do want to mention that the significant amount of identical data sets used to report on the separate critical areas did make it difficult to interpret benchmark accomplishments. Having the actual benchmark thresholds in the report would be beneficial in the future.

We appreciate the diversity in the data used as monitoring indicators however we had a difficult time identifying how the provided data is connected to agricultural activities. We feel that the data was not presented in a way that enforced the assertion the the county has met their goals and benchmarks. Through the next reporting period we would like to opportunity to work with the county to find ways to better connect indicators with agriculture in the county. We specifically want to note the NAIP data. It is stated that there is a 500 acre loss but that as a percentage that loss is under the threshold for adaptive management. We are concerned that with this data all of the critical areas are reported on in a group because a 500 acre loss of wetlands is very different than a 500 acre loss of shrub step habitat. We feel that this data needs to be interpreted using individual critical areas to really pinpoint impacts.

We want to encourage the county to collect data as allowed to increase sample sizes and methods.

Any other comments not captured above

For the next reporting cycle we suggest that the county add numerical benchmarks for the participation goals to show an increase and improvement for the next reporting cycle compared to this one.

Please consider providing a 2-3 sentence summary of your overall comments on the five-year report. This summary will be included in the director's decision letter to the county.

It is clear there has been a significant amount of work put in to implementation. We believe that the county is headed in the right direction. With the next reporting period there are some aspects of the reporting and monitoring that could be improved through adaptive management. Ecology Would like to be involved in assisting the county in identifying and helping find solutions to improve through the next reporting cycle.

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Form Name: TP 5-Year Review & Evaluation Comments
Submission Time: March 30, 2021 10:11 am
Browser: Chrome 89.0.4389.90 / Windows
IP Address: 73.42.154.195
Unique ID: 785706709
Location: 47.177101135254, -122.18650054932

Please indicate which TP member is filling out this form Agriculture

Please indicate the nature of these comments These comments are my final comments made after consideration of the written comments made by the other TP members

Please select the county five-year report under review Pend Oreille

Please choose whether you agree, partly agree, or disagree with the assertion of the county work group that it is (or is not) meeting the work plan's protection and enhancement goals and benchmarks Partly agree

Explanation

County asserts they met their protection and enhancement goals and benchmarks. The county provided benchmark exceedances in units, but did not provide BMP's that were used. It would be nice to see baseline values and units. Without the baseline it is difficult to ascertain whether protection goals are currently being met, and without the BMP's implemented it is difficult to evaluate the protection of critical areas functions and values through VSP implementation.

Outreach is being conducted through events and outreach. The amount of outreach seems sufficient for the time period of implementation.

Monitoring data is adequately assessed with some statistical backing. County looked at agricultural intersect when choosing areas to monitor.

Please consider providing a 2-3 sentence summary of your overall comments on the five-year report. This summary will be included in the director's decision letter to the county.

Data provided in the Pend Oreille report was minimal but overall satisfactory. Would like to see baseline numbers for protection and enhancement goals and the BMP's that were used to achieve these goals. POCD provided a reasonable amount of community outreach to the county and hope to see more engagement or detailed reporting in the future. Monitoring provided significant detail and statistical findings in relation to agricultural intersect. WSDA encourages Pend Oreille to continue to build robust monitoring in ways that are most practical for the county.

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