

**January 2009 DRAFT Benton County HCP - Public Comments Received during 90 day
Comment Period**

COMMENT SUMMARY. The information here includes includes comments from condensations of the public meetings and written comments (35 letters/cards from a total of about 25 people). Many letters that were submitted included comments on multiple topics. HCP project staff made their best effort to synthesize and categorize comments.

**Overall Comment (or comment part)
Frequency Within General Topic
Categories**

Comment Topic	Total
Fees/ disincentives	44
ESA	27
Mitigation	23
Implementation	22
HCP Development Process	19
Editorial	17
Incentives needed	15
Costs/Funding	15
Blue Zone	14
Take Calculations	11
ROW	10
Ideas for conservation	10
Conservation	9
General	9
Covered species	7
Monitoring	7
HCP Review Process	6
Alternatives	6
Cooperators	4
Coverage for other activities	4
Education	3
Roles	3
Want to contribute to conservation	3
County Staff Needs	1
NEPA	1
(blank)	
Grand Total	290

COMMENT SUMMARY. The table below includes comments from condensations of the public meetings and written comments (35 letters/cards from a total of about 25 people). HCP project staff made their best effort to synthesize and categorize comments. Many letters that were submitted included comments on multiple topics. Specific comment items with ≥ 4 comments of same sentiment are SHADED.

Count of order		
Comment Topic	Sub-topic	Total
Alternatives	Contractor concerns	1
	Distributed recovery sites not considered	1
	Need more detailed no-action	1
	Use education, not mitigation	1
	Non-HCP preferred	1
	Grassroots, publicly funded alternative	1
Alternatives Total		6
Blue Zone	Concerns re: changes to Zone	6
	Exclude residential, landscaped areas	1
	Reduces land values	1
	Grabs private property rights	1
	What do landowners need to do?	1
	Legality concerns	1
	Concerns regarding boundaries	3
Blue Zone Total		14
Conservation	climate change concerns	1
	importance of private lands in	1
	keep dispersed wild populations	2
	need more	2
	PCS first, then HCP	1
	Public land responsibilities	1
	County help needed	1
Conservation Total		9
Cooperators	City of Corvallis involvement unclear	1
	Utilities should participate	1
	Bad past performance	2
Cooperators Total		4
Costs/Funding	Accountability lacking	1
	Ask public willing to cover costs	1
	coexist instead	1
	HCP expensive	3
	Regulation expensive	1
	Seeking grants not worth plan	1
	submit levy to fund	1
	Total cost not included	1
	BC does not commit to funding	4
	Cooperator funding unclear	1
	Costs/Funding Total	
County Staff Needs	County vegetation specialist needed	1
County Staff Needs Total		1
Coverage for other activities	farming	1
	Forestry, farming, ranching	1
	grazing	2
Coverage for other activities Total		4
Covered species	cover more species	1
	Include system to address new populations	1
	larkspur not addressed fully	2
	why plants included?	1
	concerns re: genetics	1
	larkspur, taylors may not benefit	1

Covered species Total		7
Editorial	Addinfo re: other HCPs	1
	Context needed	1
	Define terms	1
	Need glossary	1
	Does not mention mitigation for ODA?	1
	Clarification needed	7
	Executive summary clarification	2
	Maps clarifications	1
	nomenclature suggestion	2
Editorial Total		17
Education	need more	1
	pollination ecology important	1
	Provide knowledge to landowners	1
Education Total		3
ESA	Contradicts recovery	1
	HCP Conflicts with ESA.	1
	HCP conflicts with recovery	2
	Plan does contribute to recovery	1
	property rights taken	1
	Recovery before take permits	1
	Regulatory risk to species	1
	Section 10 contradicts recovery	1
	voluntary better	4
	Will block listing of other species	1
	HCP increases liability	1
	County overstepping role?	1
	Enforcement not occurring now	1
	USFWS misinterpreting its own discretion available.	1
	HCP doesn't really protect anyone from liability	1
	Private landowners should take on own responsibilities	1
	To help recovery, include pre-2006 data	1
	Species protections not equal	1
	HCP eliminates citizen redress	2
	Concerns re: section 6 funds used for HCP	1
HCP can extend new regulations to private properties	1	
State agencies should protect/manage all populations	1	
ESA Total		27
Fees/ disincentives	Connect fee to parcel	3
	County should pay all	1
	Current approach risk to species	4
	fees pose risk to species	2
	fees- specificity	1
	penalizes landowners	4
	plan discourages voluntary work	7
	Safe harbor risks	1
	Spread costs to all	10
	Unfair	5
	use of fees	1
	voluntary better	1
	what if no habitat?	1
	what if voters reject paying?	1
	County shouldn't sell mitigation	1
Surveys should be free	1	
Fees/ disincentives Total		44
General	Appears driven by development	1
	Good plan/service	3

General	Linked to unpopular permits	1
	Need evaluation, penalty for non-performance	1
	Protect neighbors of conservation sites	1
	Sureness of science?	1
	What are other counties doing?	1
General Total		9
HCP Development Process	Landowner input insufficient	2
	Meeting notes insufficient	1
	Need better info management	1
	Need social scientist	1
	next steps	3
	Parcel size affects implementation	1
	Peer review needed	1
	What determines adoption	1
	Public input needed	1
	Roles unclear	1
SAC representation concerns	6	
HCP Development Process Total		19
HCP Review Process	post comments	1
	Want additional comment period	5
HCP Review Process Total		6
Ideas for conservation	Adopt a roadside for plants	1
	butterfly speed limits	1
	Encourage landowner propagation	1
	enlist private landowners	1
	establish popns throughout county	1
	Leverage county outreach to match grants	1
	Support prescribed fire	1
	Encourage enrollment in programs	2
	Spread info gained	1
Ideas for conservation Total		10
Implementation	Access notification too short	1
	Contractor concerns	3
	HCP Advisory Committee	2
	Management guidelines	1
	oversight	1
	ROW genetics	1
	Survey requirement unclear	1
	Surveys problematic	1
	Clarify amendment procedures	2
	Weed control needed	2
	Take availability limited- then what?	6
HCP purpose is to provide legal cover for cooperators.	1	
Implementation Total		22
Incentives needed	BC should offer help, incentives	5
	Develop plan for local recovery	1
	Enroll landowners in programs	1
	zoning needs changed	2
	tax deferral for conservation wanted	4
	Fund preservation at multiple sites	1
encourage voluntary work	1	
Incentives needed Total		15
Mitigation	Consider native pollinators	1
	Contractor concerns	2
	Contractors should be bonded	1
	keep dispersed wild populations	3
	methods too replicated	1

Mitigation	Mitigation should precede impacts	1
	Need more dynamic populations	1
	Permitting if mitigation fails?	1
	Seed collection pose risk to wild pops	1
	too few mitigation sites	2
	Should allow on-site mitigation	3
	costs high	1
	costs may increase	1
	Take care with genetics	1
	little benefit to species	1
	Concerns re: pre-mitigation already completed	1
	increases landowners liability?	1
Mitigation Total		23
Monitoring	Monitoring inadequate	1
	Monitoring may be artificially altered	1
	Should be done by independent party	1
	This protocol too expensive	1
	Evaluation needed	1
	Clarification needed	2
Monitoring Total		7
NEPA	Notification	1
NEPA Total		1
Roles	citizen comment on management of public lands	1
	Will it have ODA approval?	1
	Separation of powers- USFWS and County- who runs program?	1
Roles Total		3
ROW	Concerns re: BC's ability to manage lands	1
	Protect all ROW	1
	Unfair not able to impact Type 1 ROW	8
ROW Total		10
Take Calculations	Calculations- exempt area around existing structures	1
	Consider historic data when determining impacts	3
	impacts but no assurance species survive	1
	Should address take of all covered species	1
	underestimates take	2
	Medical Hardship Dwellings	2
	What about required wildfire management?	1
Take Calculations Total		11
Want to contribute to conservation	want to grow these species	1
	want to learn more	1
	No assurance will benefit landowners	1
Want to contribute to conservation Total		3
(blank)		
Grand Total		290