

# Kittitas VSP Draft Work Plan – Comment Response Matrix

November to January Draft Work Plan

Comment matrix updated: 2/9/2018

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
<b>Draft Work Plan</b>							
1	Jen Nelson (WDFW)	Cover			Can we get a cover photo with ag adjacent to a more functional critical area? Shrub steppe with grazing?	Cover will be updated to include multiple photos.	
2	Lila Hanson	All			Can we have definitions, index either in final draft or worksheets	Added as footnotes where definitions were requested.	
3	Lila Hanson	TOC	iii		Appendices – Can we (or do we) have these – especially B and E	These are being prepared and will be ready for review in January.	
4	Lila Hanson	TOC	iii		Figures – What is VSP Crosswalk? Even after looking at p. 17 and 34 I don't understand that term	Remove the term VSP Crosswalk from figures 3-1 and 4-1 (jargon term).	
5	Lila Hanson	1	1	4	Replace "provides for" with "forces"	Replace "provides for" with "requires."	
6	Lila Hanson	1	1	5	Replace "planning" with "regulation to benefit urban over rural people"	The intent of the GMA is to facilitate comprehensive planning to concentrate urban growth, reduce sprawl, promote natural resource industries, protect the environment, etc. These polices benefit both urban and rural areas.	
7	Lila Hanson	1	1	5	Insert "now" after GMA	The GMA has always required development of regulations that protect critical areas.	
8	Lila Hanson	1	1	6	After the "to" add "regulate critical areas on agricultural lands although agriculture was original exempt"	Add as first sentence of second paragraph: Prior to 2011, agricultural activities were exempt from critical areas protection regulations under the GMA.	
9	Lila Hanson	1	1	7	Change "In 2011" to "21 year later"	The year 2011 is important throughout the document because it is the year which correlates to baseline conditions, this is why it is pointed out here.	
10	Justin Bezold (TU)	1	2	All	Page 2 seems cluttered with the boxed and un-boxed text under the figure. Is the figure appropriate for this type of document?	Comment noted.	
11	Lila Hanson	1	2	25-30	In box strike out "traditional" and "to protecting critical areas"	VSP does provide an alternative because without VSP, or if VSP fails, counties are required to protect critical areas using traditional methods.	
12	Lila Hanson	1	1-2	1-30	Enough of my take on this. I do understand the friendlier gauge will go over better with the bureaucratic thinkers – Sort of a "tell it like it is" vs. "go along to get along" with our establishment governor. Won't pursue this throughout the document but don't want to be required to agree to statements I believe to be misleading.	Comment noted.	
13	Jen Nelson (WDFW)	1	2	31	Is construction of new barns or ag facilities included in Ag Activities and covered by VSP?	Construction of new barns requires a building permit. Therefore, it would go through traditional critical areas review under the County permit process and is not under VSP.	
14	Jack Clerf	1.2.1	3	sidebar	Include direct seeding and no-til in "Practices"?	Revise as noted.	
15	John Marvin (Yakama Nation)	1.2	3	38	Add Yakama Nation to list.	Revise as noted.	
16	Lila Hanson	1	3	45-48	Happy to see boldface here – will that remain in final?	Yes, that will remain.	
17	Jen Nelson (WDFW)	1	4	61	Have we seen the VSP Overview and Checklist yet?	No, a draft will be provided at the December Watershed Group Meeting.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
18	Justin Bezold (TU)	1	4	66	The work plan organization might be more useful presented to the reader earlier in the section. Otherwise we can rely on a table of contents.	Comment noted.	
19	Kat Satnik (KCWP)	1	4	79	Development "of" the workplan	Revise as noted.	
20	Lila Hanson	2	6	99	Can middle sentence be boldface – same as 2-9-170	Revise as noted.	
21	Jen Nelson (WDFW)	1	6	101	Wenatchee National Forest should be Okanogan-Wenatchee National Forest throughout the document	Revise as noted.	
22	Lila Hanson	2	6	103	Influence of winds	Add sentence to end of paragraph: Additionally, private lands are influenced by high winds, especially in the Yakima River Valley.	
23	Kat Satnik (KCWP)	2	6	106	Remove comma and fix verb agreement	Revise as noted.	
24	Kat Satnik (KCWP)	2	7	Text box	Lake Cle Elum Dam	Revise as noted.	
25	Kat Satnik (KCWP)	2	7	142	Proposed "the" final	Revise as noted.	
26	Kat Satnik (KCWP)	2	7	149	County should not be capitalized. This error is repeated throughout the entirety of the first four sections.	County is used as an abbreviated version of Kittitas County. A reference will be added after the first mention on page 1. "...as an alternative to managing agricultural activates in <a href="#">Kittitas County</a> ( <a href="#">County</a> ) under..."	
27	Lila Hanson	2	7	149	Obvious error in mixing up east and west 7" in east (vantage) and 129" in west (pass)	Revise as noted.	
28	Jack Clerf	2.1.1	7	149, 150	Areas of precipitation are reversed	Revise as noted.	
29	Justin Bezold (TU)	2	7	149-150	"western" and "eastern" portions of the county should be switched.	Revise as noted.	
30	John Marvin (Yakama Nation)	2.1.1	7	149-150	Western/eastern swapped.	Revise as noted.	
31	Jen Nelson (WDFW)	2	8	Fig 2.1	The hydro layer on the south side of the river and in badger pocket are missing some streams; the legend and notes (public land) don't pertain to what is shown and/or isn't easily recognized as displayed.	Maps will be included in full page size to provide additional detail. The hydrography layer used was not the Washington Department of Natural Resources version. That version will be used in the new map.	
32	Jen Nelson (WDFW)	2	8	160	Please add a quick line to define where you're including shrub-steppe lands as they're important for habitat and grazing	Revise as noted.	
33	John Marvin (Yakama Nation)	2.1.2	8	162	Add reference to shrub-steppe habitat.	Revise as noted.	
34	Kat Satnik (KCWP)	2	8	164	Insert comma after River	Revise as noted.	
35	Jen Nelson (WDFW)	2	8-9	163-167	What do the soils tell us about ag or critical areas? Is there more discussion later on? The figure 2.2 (with loam, etc.) doesn't relate back to the text.	The soils map and description is intended to provide background information on the County prior to the discussion of baseline conditions.	

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36	Jen Nelson (WDFW)	2	9	168 Fig 2-2	Hydro layer seems incomplete for south of Yakima River and Badger Pocket. Please check all figures	The hydrography layer used was not the Washington Department of Natural Resources version. That version will be used in a revised map and all maps will be full page sized.	
37	Lila Hanson	2	9	170	Could this also be boldface with public land similarly in bold face when cited?	Revise as noted.	
38	Jen Nelson (WDFW)	2	9	178	Wenas & Quilomene wildlife areas are in Kittitas County too in addition to several river access sites. Even portions of Oak Cr Wildlife Area are in Kittitas County	Add these wildlife areas to list. The VSP does not require discussion of public access opportunities, therefore, this is not a complete list.	
39	Kat Satnik (KCWP)	2	10	183	Where does irrigated pasture fit into the four categories? It appears to not be included.	Irrigated pasture is considered an irrigated agricultural activity. Add livestock to Table 2-2 under Irrigated and add "and pasture" after irrigated crops to line 184.	
40	Lila Hanson	2	10	187	What about urban and UGA? Is 1,494,400 really 100%, not noted as such	This is the total county area including UGAs and urban areas. Add footnote to clarify.	
41	Lila Hanson	2	11	189	box above – wildland fire prone areas are not critical areas under GMA	Correct, reference to wildfire prone areas is relating to agricultural viability.	
42	Jen Nelson (WDFW)	2	11	190 Fig 2-4	Hydro layer, but is Eaton included in Rangeland? It should be. Did much of the Eaton Ranch not show up in the accounting for percentages if it's not shown here?	Yes, the rangeland in the shrub-steppe areas of the County (including the Yakima Canyon area south of Ellensburg) were included this figure. These lands were difficult to inventory initially because they were not included in either the Farm Service Agency or Washington State Department of Agriculture data. Tax parcel data with Department of Revenue codes were used to supplement the other data in order to capture the lands that were not included. The revised agricultural land cover data will be displayed in updated maps and tables.	
43	Lila Hanson	2	11	194	Insert "non-public" before "lands" at the end of sentence	This is referring to the percentage of the entire county not just non-public lands.	
44	Justin Bezold (TU)	2	12	195-200	The paragraph reads oddly, specifically the sentence starting "Irrigated, dryland, and . . ."	Revise as noted.	
45	John Marvin (Yakama Nation)	2.2	12	201-206	How are hobby farms without income accounted for?	According to the U.S. Department of Agriculture Census of Agriculture there are 326 farms in Kittitas County with sales of less than \$1,000 per year. A new row will be added to Table 2-3 to reflect this.	
46	Justin Bezold (TU)	2	12	207-217	Table placement? Seems odd but the content is beneficial to a reader	Comment noted.	
47	Kat Satnik (KCWP)	2	12	207	I still don't see irrigated pasture as a land use.	See response to comment 39.	
48	Lila Hanson	2	12	208	Are horse keeping enterprises considered "agricultural activities"?	If such operations are "producing, breeding, or increasing agricultural products, including livestock" then they are considered agricultural activities. See definition of agricultural activities on page 2.	
49	Lila Hanson	2	12	213	Last sentence after "consumption" say "or add to groundwater"	Comment noted.	Y
50	Jen Nelson (WDFW)	2	12	213	It's worth mentioning in this inset that even on good water years, we are over appropriated and water supply is a concern for ag viability and fish and wildlife resources. (there are 2 page 12s)	Revise to say: In <del>dry</del> some years, ...	
51	Lila Hanson	2	12	217	Do we know % of farms that earn a family living wage?	We do not have these data. The Census of Agriculture states the average net cash income per farm is approximately 5.1 million. However, the distribution of income between farms is not shown in the data.	
52	Jen Nelson (WDFW)	2	12	224	Suggest referencing the most recent County CAO for designation and identification of critical areas in the county. Keeping the language such that VSP will reference the most up to date CAO will help keep it current.	Add note saying that that CAO is currently being updated. Revise CA definitions to match draft CAO.	

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53	Jen Nelson (WDFW)	2	12	226	I'd refer to the most recent draft CAO and/or stick with Commerce descriptions or RCW for each critical area. If customized, please include PHS reference within the HCAs to include riparian, shrub steppe, and biodiversity corridors, update CARAs as draft maps currently exist, GHAs will change to include alluvial fans and CMZs in addition to landslide and other erosion hazards, FFAs can and should incorporate local knowledge and ground water flooding as well. It's important for the group to remember we don't need to redefine critical areas through VSP; that has already been done.	See response to comment 52.	
54	Justin Bezold (TU)	2	12-13	n/a	Critical areas definitions are well laid-out and easy to understand.	Comment noted.	
55	John Marvin (Yakama Nation)	2.3.1	12		CARA box. See 10/2017 Draft CAO and associated maps.	See response to comment 52.	
56	John Marvin (Yakama Nation)	2.3.1	13		Geo-haz box. See 10/2017 Draft CAO and associated maps.	See response to comment 52.	
57	Jack Clerf	2.3.2	14	all	Grant County specifically relates critical area functions to area situations and practices. Does Kittitas County need this too?	Relevant information was moved to Section 3 in the Kittitas Work Plan to reduce repetition.	
58	Jen Nelson (WDFW)	2	14	243	Add "Functioning" to the start of Critical areas also help moderate...	Revise as noted.	
59	Lila Hanson	2	14	265	Human habitats are not a concern of CAO (add that sentence)	Add to beginning of paragraph: Critical areas only address habitat for fish and wildlife species.	
60	Heather Kosaka (Ecology)	2.4	14	268	Maybe describe why (and for what purposes) you identified these four planning areas in the work plan narrative. Are there priority areas for funding purposes (N Kittitas County, Kittitas Valley, Kittitas Valley Rangeland and Columbia)?	To be added when Community Areas are finalized.	
61	Jen Nelson (WDFW)	2	14-15		I realize this is still a work in progress and we're still defining the areas but a couple thoughts—describing why we broke the areas out like we did will be important and Table 2-5 is confusing because there is rangeland listed in both Kittitas Valley Categories and it's unclear what irrigated means in the rangeland column. Anna's description of the areas at the meeting made more sense to me.	Remove rangeland from Community Area names and revise based on discussion at the November Watershed Group Meeting.	
62	Lila Hanson	2	15	275	Can Table 2-5 add a column on public land	Public land is not included in VSP.	
63	Kat Satnik (KCWP)	2	15	275	Irrigated pasture?	See response to comment 39.	
64	Kat Satnik (KCWP)	3	16	278	Change to "Establishing baseline conditions is necessary to measure changes in the critical areas protected under the VSP."	Revise with: Establishing baseline conditions is necessary to measure changes in the critical areas functions and values protected under the VSP.	
65	Jen Nelson (WDFW)	3	16	281	Protecting "and enhancing" critical area functions and values	Enhancement is included in the second bullet.	
66	Jen Nelson (WDFW)	3	16	287	"On Agricultural lands," any improvement of critical areas functions and values...	Revise as noted.	

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67	Heather Kosaka (Ecology)	3	16	289	Consider providing an example. For instance, if a wildfire burns 250 acres of shrub-steppe rangelands, 250 acres is subtracted from baseline.	Methods for determining how to track and report these changes will be determined through the adaptive management process. The Work Plan provides a framework, but does not dictate exactly how this will be complete due to the uncertainty in funding and resources that will be available in the future.	
68	Jack Clerf	3	16	289-292	Baseline conditions outside of VSP; Changes are monitored and reported? Why? How?	These changes are not specifically required to be reported through VSP; however, if changes to baseline conditions do occur that are not the result of agricultural practices these will be discussed through the adaptive management process.	
69	Lila Hanson	3	16	291	Does this sentence remain in final doc? Should be "would be" be "are"	Yes, this is referring to the adaptive management process that will occur in the years after this plan is approved. Change "would" to "will."	
70	Lila Hanson	3	16	296	Better word than "dictate"? Maybe require lead to	Change "dictate" to "direct."	
71	Jen Nelson (WDFW)	3.1	17	303	The overlap of ag activities and critical areas may actually be pretty big in Kittitas County. Much of the rangeland is within mapped shrub-steppe polygons which is a priority habitat supporting many local species. The irrigated portions of the valley are basically big alluvial fans with streams spreading across much of the valley floor. These coupled with frequently flooded areas cover a pretty good portion of the ag lands. This isn't to say that ag and these CAs aren't co-existing relatively well in many cases, but to say there is minimal overlap seems inaccurate.	Update PHS discussion.	
72	Jen Nelson (WDFW)	3.1	17	Map inset	Thanks for including this inset about maps being coarse scale-that's important for all landowners (and regulators) to understand. We suggest changing case-by-case to site specific basis and eliminating the "through farm stewardship or similar planning" portion of the sentence.	Revise as noted.	
73	Lila Hanson	3	17	311	"targeted"? discussed	Change "targeted" to "addressed."	
74	Lila Hanson	3	17	314	Could other help allow public lands to be helpers or participate?	Public lands are not included in VSP.	
75	Kat Satnik (KCWP)	3	18	320	100% of "Total Agricultural Lands" is under the "Fish and Wildlife Habitat Conservation Area" designation?	PHS discussion will be updated.	
76	Jen Nelson (WDFW)	3.1	18	Table 3.1	Hopefully we can work together to refine the PHS data you've got and make better sense of the HCAs and figure out how we got to 100%; CARAs will cover nearly 100% of ag lands with the new draft maps, the description of GHAs will be different in the new CAO and these numbers may change as well. It'd be helpful in the text somewhere to briefly describe where the data for each CA comes from.	PHS discussion and maps will be updated. Appendix B-1 will describe the methods for the Baseline Conditions as well as provide a list of data sources.	
77	Jack Clerf	3.1	18	Table 3.1	All ag land in Kittitas County is HCA? How was that determined? Grant County has 10% and I believe Chelan has 40. I have issue with 100% of Kittitas County ag land being declared critical area.	PHS discussion will be updated.	
78	Lila Hanson	3	18	324	Could "candidate habitats" be defined – maybe everyone else know but I can only guess	Add this definition: Candidate species refer to those species with sufficient evidence to propose them as either threatened or endangered under either state or federal laws.	
79	Lila Hanson	3	18	327	Is this 100 ft. buffer already in place	The 100-foot buffer is an approximation of the Wellhead Protection Areas. The County did not provide KCCD with updated critical aquifer recharge area maps.	

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80	Heather Kosaka (Ecology)	3.1.1	19	332-339	Consider adding a table (visual) with water quality, quantity, and habitat functions listed under each function (i.e. under water quality, add sediment removal, nutrient removal, etc.). Under "habitat functions" add invertebrate habitat, Amphibian habitat, native plant richness, bird habitat, etc.	More detail what specific functions each critical area provide is included in Section 5.	
81	Lila Hanson	3	19	339	Could we add – wetland vegetation is sometimes weeds adding to farm costs or the type of vegetation that can reduce instream flow.	Add sentence: Non-native, weedy vegetation can hinder wetlands ability to provide these functions (particularly habitat functions) and add to farm costs. Invasive vegetation, such as reed canary grass, can form a monoculture reducing habitat complexity and increasing localized flooding.	
82	Kat Satnik (KCWP)	3	19	341	Change river valleys to waterways, or rework this statement in some other way.	Revise: These wetlands are concentrated <u>in river valleys near streams and waterways</u> that are...	
83	Jen Nelson (WDFW)	3.1	19	343	NWI didn't map wetlands in forested areas very well. There may be more forested wetlands within rangelands that aren't known by NWI.	Comment noted, currently the County does not have updated critical areas maps.	
84	Heather Kosaka (Ecology)	3.1.1	19	344	"There are no mapped wetlands"....Consider adding a footnote or sentence about the representational nature of maps that do not always accurately depict field conditions. Wetland acreage is compared to benchmark acreage of wetlands in 2011, per Kittitas County's GIS critical areas mapping, NWI, or whatever tool used to establish baseline.	This is stated in the "Use of Maps and Data" text box on page 17. It is also reiterated in Appendix B-1.	
85	Heather Kosaka (Ecology)	3.1.1	19	345	How will you track changes in wetland acreage? What will the County do if they find that site conditions do not match existing maps? Consider adding this to part of the work plan narrative.	Discussion on tracking critical areas acreages is included in Section 5.3 Indicators.	
86	Lila Hanson	3	19	349	When habitat burns it no longer considered part of VSP?	If agricultural activities are occurring and the area provides critical areas functions and values then it would be included in VSP.	
87	Jen Nelson (WDFW)	3.1	19	349-350	Please remove the sentence: "When wetlands dry up in the county from improved water management practices, they are no longer considered part of VSP baseline conditions." While often this is probably true for purely irrigation induced wetlands this blanket statement seems overreaching at this point and we can't have a changing baseline if we intend to measure against it. I would defer to Ecology's wetland experts on this one and/or just leave the inset you provided on line 352, page 20.	Revise as noted.	
88	Justin Bezold (TU)	3	All CA maps		Can you provide a larger map if it is rotated 90 degrees clockwise? The current size is difficult to interpret.	All maps will be updated to full size.	
89	Lila Hanson	3	20	352	Are dried up wetlands still considered a critical area?	See "Irrigation-Influenced Wetland" text box.	
90	Jen Nelson (WDFW)	3.1.2	21	inset	Some of these species don't have much overlap with ag (spotted owls, goshawks, pileated woodpeckers) and others are missing like Greater Sage Grouse and burrowing owl. I think we'd be best served to focus on listed species (state and fed) and more specifically the habitats they depend on as well as migration corridors. Streams, riparian, shrub steppe (particularly deep soils), and biodiversity areas/corridors will probably cover most of our needs for HCAs as they pertain to agriculture.	Remove species listed in comment. This is not meant to be a complete list, but to give an overview of important species in the County.	
91	Jack Clerf	3.1.1	19	351	Is this large wetland NE of Ellensburg based and described solely by NWI from USFWS? Confusing frequently flooded with wetland?	This is referring to many large wetlands in the area northeast of Ellensburg. Frequently flooded areas are discussed in Section 3.1.5.	

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92	Jack Clerf	3.1.1	20	352	Is this "jurisdictional" determination preliminary, actual, pending, or assumed?	Jurisdictional means that they are regulated as wetlands under the CAO or VSP. However, it is not required to be stated in this section, remove the word "jurisdictional" to reduce confusion.	
93	Jack Clerf	3.1.1	20	Fig 3-2	As mentioned in notes, there is a "potential" for critical areas presence as depicted on map. Do we want to assign critical area to locale that may not be one? Won't that skew baseline and monitoring if future assessments show initial label was wrong?	Maps and data represent the current best data for critical areas.	
94	Jack Clerf	3.1.2	21		Do we need to mention the exclusion of irrigation delivery systems from HCA? (RCW36.70a.030(5))	Added to HCA description in Section 2.3.	
95	Jack Clerf	3.1.2	21	sidebar	Spotted owl, golden eagle, and gray wolves are common in Kittitas County?	See response to comment 90.	
96	Jen Nelson (WDFW)	3.1.2	21	356-379	This is all very general with little specificity to Kittitas County. It'd be great to incorporate shrub steppe into the discussion.	Add on line 370: Shrub-steppe habitats are an important feature in the County because they provide habitat for sage grouse, ground squirrel, and other birds. The typical vegetation in these communities are open sagebrush and shrub plains with understory grasses.	
97	Lila Hanson	3	21	377	For curiosity sake – what is this work? Weibull? Also line 736	Citation is included in Section 7 References: Weibull, A., Ö. Östman, and Å. Granqvist, 2002. Species richness in agroecosystems: the effect of landscape, habitat and farm management. Biodiversity and Conservation 12(7):1335-1355.	
98	Kat Satnik (KCWP)	3	21	378	This statement could work against producers as protection of crops from wildlife damage would be seen as a negative, not a positive.	Remove sentence to avoid misinterpretation.	
99	Lila Hanson	3	21	383	Can we know what % of this is public ownership if ag is 8%	The 8% refers to publicly owned agricultural lands, no public lands are included in this or any of the baseline condition numbers.	
100	Jen Nelson (WDFW)	3.1.2	21	383	The stream layer on the maps is not the most accurate for the County and many of the small tributaries that intersect ag lands are not shown in Figure 3.3—so long as it's clearly stated that this map and these numbers are only showing the highest order streams and there are others, we would be OK with it although it seems like it could add confusion.	The stream layer will be updated to the Washington Department of Natural Resources version. Order of streams will be noted, as there are a significant number of lower order streams that clutter the map if included.	
101	Jen Nelson (WDFW)	3.1.2	21	384-386	Coho salmon are present as well and will be increasing in numbers as a coho hatchery will likely soon be constructed just outside of Ellensburg. Bull Trout and Steelhead are federally listed; chinook and coho are present throughout many of the tribs and mainstem and sockeye are in the Yakima and Cle Elum Rivers. Lamprey are also distributed throughout the County. Please ensure the number of miles of priority habitats include areas above man-made barriers—I'm not sure where the numbers come from. We're happy to set up a time to try and get more accurate mapping of the FWHCA/PHS intersections with Ag.	Updated Priority Habitat and Species data has been requested to ensure we have the most current and most comprehensive information. Updated maps will be completed and will include fish/aquatic species mentioned.	
102	Kat Satnik (KCWP)	3	21	387	Have exceeded	Revise as noted.	
103	Kat Satnik (KCWP)	3	21	391	Bacteria from livestock and wildlife using ag-lands,	Revise as noted.	
104	Kat Satnik (KCWP)	3	21	391	What "toxins from chemical inputs" have been detected above limits in irrigation water in Kittitas County?	Currently there is an approved TMDL for dieldrin and DDT in the Upper Yakima River and a TMDL in development for toxics in the Yakima River.	
105	Jen Nelson (WDFW)	3.1.2	21		For riparian systems, please also include their importance to wildlife. Eastern Washington riparian areas have very high bird and mammal diversity and use; it's not just about the fish and/or water quality.	Add language to text box.	

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106	John Marvin (Yakama Nation)	3.1.2	22	394-395	Add coho, sockeye and lamprey.	Revise as noted.	
107	John Marvin (Yakama Nation)	3.1.2	22	394-395	Irrigation has resulted in an "upside down" hydrograph.	Replace "Irrigation has resulted in increased summer flows in some systems (e.g., KRD North Branch Canal)" with "Many streams, particularly in the Kittitas Valley, have an upside-down hydrograph with much higher than natural flows through the irrigation season and low flows in the fall and winter due to the volume of water conveyed into the sub-basins for irrigation. Additionally, water management can result in low flows in dry years, especially in the upper reaches."	
108	Jen Nelson (WDFW)	3.1.2	22	380-396	Please include discussion about riparian areas. To simply call it the ribbon of green (inset) doesn't really take into account those locations where riparian vegetation has been replaced with access roads and/or crops and the impacts associated with removal of actual riparian vegetation. There is also room here to discuss crack willows and the desire to replace them with native vegetation that would be better for fish, wildlife, and agriculture/landowners.	Revise as: <u>Vegetation associated with the interaction between Located along water resources (streams and irrigation waterways) and upland vegetation. Typically associated with a specific vegetation composition that is different from upland vegetation, and form a "ribbon of green" from ordinary high water and within irrigation seepages-This vegetation has important functions for water quality, habitat and hydrology.</u>	
109	Lila Hanson	3	22	392	Add with urban lands	Revise as noted.	
110	Lila Hanson	3	22	394	Intensive development = residential or recreational what?	Add ", such as high density residential development" to the end of this sentence.	
111	Jack Clerf	3.1.2	22	1st sidebar	Removal of LWD creates low flows during dry years?	Delete bullet. Also, see response to comment 107.	
112	Jack Clerf	3.1.2	22	1st sidebar	LWD removed from systems due to its interference with irrigation systems. Believe it probably relates more to flood control and shore erosion	Revise last bullet to state: Large woody debris has been removed from systems due to reduced conveyance and increased bank erosion from scour	
113	Jen Nelson (WDFW)	3.1.2	22	396 inset	Consider using WDFW's PHS definition: A riparian habitat area (RHA) is defined as the area adjacent to aquatic systems with flowing water (e.g., rivers, perennial or intermittent streams, seeps, springs) that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other. Riparian habitat encompasses the area beginning at the ordinary high water line and extends to that portion of the terrestrial landscape that directly influences the aquatic ecosystem by providing shade, fine or large woody material, nutrients, organic and inorganic debris, terrestrial insects, or habitat for riparian-associated wildlife. It includes the entire extent of the floodplain because that area significantly influences and is influenced by the stream system during flood events. The riparian habitat area encompasses the entire extent of vegetation adapted to wet conditions as well as adjacent upland plant communities that directly influence the stream system.	Revise as noted, add definition to beginning of paragraph.	
114	Lila Hanson	3	22	395	1st Box – ribbon of green=weeds? Historically... salmon? Water management? add, and flood control ??? others	See response to comment 108.	
115	Lila Hanson	3	22	395	Citation (Kittitas Co et al 2013) what document?	Citation is included in Section 7 References: Kittitas County, City of Cle Elum, Town of South Cle Elum, and City of Ellensburg, 2013. Kittitas County Regional Shoreline Master Program Update - Shoreline Inventory and Characterization Report. Ecology Grant No. 1200054. May 2013.	
116	Lila Hanson	3	22	396	End of box – Do we know what riparian vegetation uses more water than is saves?	Rates of evapotranspiration (water use by vegetation) vary too widely with temperature and humidity to make a definitive statement here. The location of the vegetation also makes a big difference. The shade provided by vegetation on the south banks of streams reduces evaporation more than vegetation to the north.	



Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
117	Jen Nelson (WDFW)	3.1.2	23	Fig 3.3	The distribution map should maybe include critical habitat for bull trout and steelhead since they're the ESA listed species in our County. Distributions conveyed on a map at this scale are not terribly useful.	Currently working to update maps.	
118	John Marvin (Yakama Nation)	3.1.2	24		PHS – add reference to threatened, endangered and sensitive species.	Revise as noted.	
119	Kat Satnik (KCWP)	3	24	400	PHS are found within 100% of ag-lands, but are mostly located in the upland range community area? I don't understand what you're trying to say.	Currently working to refine this data.	
120	Jack Clerf	3.1.2	24	401	100% ag land PHS/HCA. How is that?	Currently working to refine this data.	
121	Jen Nelson (WDFW)	3.1.2	24	399-406	I think it'd be useful to sit down and really look at these areas together. I think we can refine these maps to make them more useful and less threatening to producers. Focusing more on habitat types and less on individual species may change how the maps look and may reflect how we'll actually be tracking progress better than by individual species. Shrub steppe habitat is an important focus, sage grouse need to be mentioned within the text and insets as they're a critical keystone species for this habitat. We'd like to see the ALI and/or WA connectivity linkage areas for sage grouse shown as a biodiversity area. New PHS maps will reflect these areas in the relatively near future. It's also important to note that rangelands provide habitat for more than just big game species just as riparian areas provide habitat for more than fish/salmonids.	Currently working to refine this data.	
122	Lila Hanson	3	24	406	Who has done the mapping of 5000 acres? Half mapped?	Currently working to refine this data.	
123	Lila Hanson	3	24	407	Remove last sentence – statewide is not this county – implication?	Revise as noted.	
124	Jen Nelson (WDFW)	3.1.2	25	Fig 3.4	Please make the sage grouse blobs much larger or convert to a corridor to avoid giving out sensitive information. Our preference would be to lump into shrub steppe, riparian, streams, and biodiversity corridors rather than call out specific species or groups of species that are incomplete and could unnecessarily alarm producers. This map also seems to include portions of public lands?	Currently working to update maps.	
125	John Marvin (Yakama Nation)	3.1.3	26	415	See 10/2017 Draft CAO and associated maps. CARA will be designated.	See response to comment 52.	
126	Lila Hanson	3	26	417	Definition?	See response to comment 52.	
127	Jen Nelson (WDFW)	3.1.3	26	412-418	Strike the word "Public" as CARAs protect all drinking water. Also reference the updated draft CAO and maps that reflect draft maps covering nearly the entire county, including ag zones.	See response to comment 52.	
128	Lila Hanson	3	26	419	Why mention if no CARA? Is true to say "potentially for benefit to CARA..."	See response to comment 52.	
129	Lila Hanson	3	26	420	Figure 3-5 If there are more, how were these mapped?	See response to comment 52.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
130	Jen Nelson (WDFW)	3.1.4	27	422-431	We believe this focus is too narrow for GHA; by statute, they include CMZs and alluvial fans which do intersect agricultural activities. The new draft CAO has a more comprehensive definition of GHAs. This critical area has the potential for lots of intersections with ag as an active alluvial fan can cause major erosion on a field, particularly if it's freshly tilled. This could connect directly with the ag viability piece potentially.	See response to comment 52.	
131	John Marvin (Yakama Nation)	3.1.4	27	432	See 10/2017 Draft CAO and associated maps. Geo-haz will be designated.	See response to comment 52.	
132	Lila Hanson	3	27	432	Again if none, why this? Are all steep slopes "highly erodible land"?	See response to comment 52.	
133	Jen Nelson (WDFW)	3.1.4	27	435	The text states that steep slopes are mostly in rangelands, but Figure 3.6 shows them mostly in Badger Pocket, within the irrigated area.	Currently working to refine this data.	
134	Lila Hanson	3	27	437	Landslide occurrence – often along highways and uncontrolled rivers and streams	Comment noted.	
135	Lila Hanson	3	27	437	Add recreation to wildfires and overgrazing?	Comment noted.	
136	John Marvin (Yakama Nation)	3.1.5	29	441	Effects of climate change on floodplains? Protecting and restoring floodplains mitigation for climate change consistent with BAS.	Climate change would be considered a change in baseline conditions and any changes to indicators resulting from climate change would be addressed through the adaptive management process.  Add callout box to bottom of page 18: Climate change may cause impacts to critical areas functions and values such as increasing stream temperatures and increasing the frequency and duration of floods and droughts. These types of impacts to critical areas functions and values would be considered a change in baseline conditions under the VSP since they are not attributed to changes in agricultural practices. However, stewardship practices implemented through VSP can help increase resilience to climate change impacts for both agricultural viability and critical areas functions and values. Changes in baseline conditions due to climate change will be reviewed and discussed in VSP reporting and adaptive management.	
137	Lila Hanson	3	29	447	How many farms are included in this? One of every 4?	We do not have data to provide this level of detail.	
138	John Marvin (Yakama Nation)	3.1.5	29	450	County is currently working on new FEMA maps.	Revise to reflect this update.	
139	Jen Nelson (WDFW)	3.1.4	29	450	A major update to the FEMA maps is currently underway.	Revise to reflect this update.	
140	Jen Nelson (WDFW)	3.1.4	29	inset	Typos: Cle Elum River, Manastash Creek. It's also worth mentioning here how the irrigation conveyance infrastructure (canals, ditches, laterals, etc.) also convey floodwaters.	Revise typos as noted. Add bullet: Irrigation canals can also convey floodwaters. However, these events often cause damage to irrigation systems, which is an issue for agricultural viability.	
141	Lila Hanson	3	29	452	Is Cle Elum River misspelled in box above – typo?	Revise as noted.	
142	Kat Satnik (KCWP)	3	29	450	Much needed changes	Comment noted.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
143	Jen Nelson (WDFW)	3.2	31		Where do working public lands come into play? WDFW (and WDNR) has worked hard to continue grazing in many locations and I'd think this fits into the Ag viability section? Also, could be incorporated into the description of the TCF	Public lands are not included in the VSP even if agricultural practices occur on them. Add on line 492: Although agricultural activities occurring on public lands are not included in VSP, livestock grazing on public lands is an important component of agricultural viability in the County. Grazing on public lands improves habitat conditions for wildlife species, such as mule deer, as well as protects conversion of private agricultural lands to meet grazing needs.	
144	Lila Hanson	3	31	467	Can this table include "Asset Protection" as a concept with ability to acquire operating farms – and retention of rest of farm ownership as "details" – also processing facilities as a detail under infrastructure – also include lifestyle as element of viability	Revise as noted.	
145	Lila Hanson	3	32	481	New technology is often too expensive for many small farms	Comment noted.	
146	Lila Hanson	3	32	486	Under incentives, does "measures" mean sacrifices? Should it say so?	This is referring to grants or other programs that help pay for implementation of new agricultural practices such as sprinkler systems which have a benefit to the viability of farms. Agriculture producers are not forced to participate in incentive programs.	
147	Lila Hanson	3	33	489	Nearness to "Imperial City" a factor (may not be unique) raises costs, restrictions and regulations, destroys lifestyle, loses local control, promotes invasive species – on and on	Add to Threats: <ul style="list-style-type: none"> <li>• Increased cost of living</li> <li>• Invasive species</li> </ul>	
148	Lila Hanson	4	34	505	Linking Kittitas County with the entire state implies something – what?	Remove reference to "Washington State" to avoid misinterpretation.	
149	Lila Hanson	4	34	510	Include "control weeds"	Revise as noted.	
150	Heather Kosaka (Ecology)	4.1	35	528	Change "It is important to consider implementing a suite of farming practices in order develop..." To "It is important to consider implementing a suite of farming practices in order to develop."	Revise as noted.	
151	Kat Satnik (KCWP)	4	35	530	Viability with implementation	Revise as noted.	
152	Heather Kosaka (Ecology)	4.1	35	537	Unsure how all the pop up boxes relate to each other or to the Section.	They provide information on how to take credit for stewardship practices including those completed outside of funded programs and examples of a common practice in the County.	
153	Lila Hanson	4	35	540	And vice versa? – also does this mean no farm plan required?	Participation in funded programs are considered participation in VSP. Individual Stewardship Plans are not required to participate in VSP; however, producers must report stewardship practices to the VSP Coordinator (KCCD) to be a VSP participant. The VSP Checklist is used to identify producers engaged in stewardship. The VSP Coordinator (KCCD) will use this information to understand where specific stewardship practices are being implemented so that they can be tracked under VSP.	
154	Heather Kosaka (Ecology)	4.1	36	543	Suggest linking "critical area functions" to critical areas.	The link between critical area functions and critical areas is described in Section 3 in the "Characteristics and Functions" sub-section for each critical area.	
155	Heather Kosaka (Ecology)	4.1	36	543	Define "Aquatic Organism Passage" (i.e. anadromous fish, excluding amphibians.)	Add note to table: Aquatic organism passage includes practices that improve the ability of all aquatic organisms that use streams for migration. This includes anadromous fish, resident fish, and any other aquatic species which rely on in stream passage.	
156	Kat Satnik (KCWP)	4	37	548	Remove comma	Revise as noted.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
157	Lila Hanson	4	37	551	Define "private sector" (including in Section 6.4.2)	Add as footnote: Private-sector activities include agri-businesses and associations serving the County such as food-processing companies, certified crop consultants, and agri-businesses.	
158	Justin Bezold (TU)	4	37	553-555	The sentence may provide a reader more benefit if moved after the paragraph currently ending on line 579.	Revise as noted.	
159	Kat Satnik (KCWP)	4	37	564	Management systems, stock watering	Add comma as suggested.	
160	John Marvin (Yakama Nation)	4.2.1	39		Table 4-3 – Forest Stand and tree/shrub pruning?	Remove practice from table, it is not applicable to grazing in forested areas.	
161	Kat Satnik (KCWP)	4	39	603	Grant County? Should this be Kittitas County?	This should be Grant County. The Grant County Conservation District provided KCCD with information on the NRCS practices implemented in Kittitas County.	
162	Jen Nelson (WDFW)	4.2.1	39	Table 4.3	Can we lump these so they make sense to the non-NRCS speaking person? A few groups like water conservation, riparian planting, grazing management, etc. would be more meaningful and helpful for me. Are the forestry practices aimed at fire wise practices (fuel breaks) or habitat improvement? Some of these may not apply to VSP. Our recommendation to lump practices into more general terms holds for other tables with similar practices too (4.4).	Group similar to groupings in Tables 5-6 and 5-7.	
163	Jen Nelson (WDFW)	4.2.2	39	Table 4.4	Please update the AOP to reflect stream miles opened and include a quantity for fish screens. We had a pretty good number for 2013 that needs updated.	Do not have this data.	
164	Lila Hanson	4	39	602 and 613	More attention to weed control if applicable or a separate table for non-NRCS and non-KCCD activities	We do not have any data on practices implemented outside of the NRCS or KCCD. Under VSP additional efforts will be made to track all stewardship activities inside and <u>outside</u> of funded programs.	
165	Lila Hanson	4	40	615	Some CRP programs done with HEL	Revise: ...pays a yearly rental payment in exchange for farmers removing environmentally sensitive land, <u>such as fish and wildlife habitat conservation areas or geologically hazardous areas</u> , from agricultural production and planting species that will improve environmental quality.	
166	John Marvin (Yakama Nation)	4.2.3	40	619	How much CRP? Not a critical area?	KCCD is working with FSA to get the number of acres enrolled in CRP in the County. CRP is not automatically designated as a critical area; it is considered an agricultural activity under RCW 90.58.065 (see page 2). However, it may overlap with other critical areas such as HCA.	
167	Jen Nelson (WDFW)	4.2.3	40	620	Lands under CRP at baseline in July 2011 should count toward the baseline conditions. The blanket statement that they are only enhancements seems inaccurate...unless we didn't have any at baseline.	See response to comment 166.	
168	Lila Hanson	4	40	627	Should trails and roads be listed as barriers that need removing?	This is a specific description of the Yakima Tributary Access & Habitat Program, which is focused on fish passage barriers.	
169	John Marvin (Yakama Nation)	4.2.4	40	630	Add Yakama Nation to list.	Revise as noted.	
170	Kat Satnik (KCWP)	4	41	639	The Integrated Plan includes seven elements that benefit agricultural viability and critical areas—fish passage, structural and operational changes to existing infrastructure, increased surface water storage, groundwater storage, enhancement of habitat, water conservation, and market reallocation.	Add to first paragraph.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
171	Kat Satnik (KCWP)	4	41	648	Supplement and expand on efforts	Revise as noted.	
172	Kat Satnik (KCWP)	4	41	663	Yakima River Basin Water Enhancement Project Working Group's Executive Committee	Revise as noted.	
173	John Marvin (Yakama Nation)	4.2.7	42	677	Add Yakama Nation to list.	Revise as noted.	
174	John Marvin (Yakama Nation)	4.2.8	42	682	2,137 more parcels? This is a problem for both CA protection and ag viability. How to address?	<p>Agricultural lands that are converted to other uses, such as residential development, would be regulated under the County Critical Areas Ordinance. Expansion of residential development into agricultural areas is an agricultural viability concern which is included as a threat in Section 3.2.</p> <p>Revised Section 4.2.8 to reflect increase in parcel numbers only within unincorporated County lands and added changes to agricultural land base from public land acquisitions as follows:  <i>In 2017, there are <a href="#">approximately 2,137,350</a> more tax parcels <a href="#">in the unincorporated area of Kittitas County</a> than there were in 2011, reflecting further subdivisions of land in the County. <a href="#">Significant portions of private lands have also been acquired and are now state owned. Between 2011 and 2017, the Washington Department of Fish &amp; Wildlife acquired more than 15,000 acres of privately owned forestland in the upper Manastash and Taneum watersheds, incorporating those lands into the LT Murray Wildlife Area.... See Section 3.2 for summary of agricultural viability concerns related to agricultural land use and land ownership.</a></i></p>	
175	Lila Hanson	5	44		Intro about CAF and not ag viability	<p>Goals and benchmarks for agricultural viability are not required under VSP. However, agricultural viability must be maintained through implementation of critical areas goals and benchmarks.</p> <p>Add to end of first sentence:  ...areas <a href="#">while maintaining agricultural viability</a>.</p>	
176	Kat Satnik (KCWP)	5.1	45	713	Plans <b>to</b> include	Revise as noted.	
177	Lila Hanson	5	45	714-715	When ag is mentioned it's as participants=providers=sacrifices, not as viable and/or enhanced	Goals and benchmarks for agricultural viability are not required under VSP.	
178	Lila Hanson	5	45	715	How will farms with CAF be counted if not enrolled or with official farm plans?	Enrollment in VSP is optional, not all farms with critical areas must be enrolled for VSP to meet its goals and benchmarks.	
179	Heather Kosaka (Ecology)	5-1	46	740	Table 5-1 Wetland Protection and Enhancement Goals> Key Functions> Habitat. Change, "Provides off channel refuge during high flows fish bearing stream connections" to "Provides off channel refuge during high flows and (?) fish bearing stream connections."	<p>Revise as:  Provides off channel refuge during high flows and connections to fish bearing streams.</p>	
180	Kat Satnik (KCWP)	5.1	46-51	Tables	There are multiple TMDLs that should be included in the "Existing Plans" sections of these tables.	<p>Revise  Existing water quality data <a href="#">and reports</a>, such as Washington State Department of Ecology 303(d) list (see <a href="#">Appendix B-6 for 303d list and Appendix D for full list of TMDLs in the County</a>)</p>	

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181	Jen Nelson (WDFW)	5.1	46	Table 5-1 740	Goal #1 should read "Protect and enhance wetland function", no need for an "and/or"; Objectives 2 & 3 seem to relate mostly to streams and not wetlands—are runoff and erosion the limiting factor for wetland function? Wetlands seem to be more impacted by drain tile and filling; can we add an objective and/or practices that address this?; in the Ag Viability section, the regulatory uncertainty should probably reflect Ecology or Corps or the CWA—someone who regulates wetlands	Remove "or" from goal for all tables. <i>Discuss with Watershed Group. This language has been used elsewhere simply to further clarify that the goal of protection is unique from that of enhancement. The VSP law makes meeting the protection benchmark a condition of the program, while enhancement is aspirational. This change clarifies the goal, but eliminates the nuance of protection vs. enhancement.</i>  Water quality is a function and value of wetlands; therefore, these objectives relate to protecting and enhancing the water quality of wetland areas.	
182	Jen Nelson (WDFW)	5.1	47	Table 5-2 743	Replace "and/or" with "and"; Table focuses almost entirely on riparian and streams with little mention to shrub steppe, forest, or biodiversity/migration corridors; uplands (forests and shrub steppe) contribute to the 4 key functions as well; in the Habitat Function, please add: "Provides shrub-steppe habitat for wildlife by maintaining connectivity and quality necessary to support all life stages of game and non-game wildlife (perennial grasses, forbs, shrubs)"; For Objective 2, "...by limiting <u>excessive herbivory</u> and trampling of habitat." And please add salt & mineral supplements, restoration plantings (particularly shrub-steppe), and floodplain roughness as stewardship practices; For Objective 3, conservation easements (all habitat types) and/or buffers along streams (where sprinklers don't reach) should also be stewardship practices. We have some concerns with this objective the way it's worded because all sprinklers aren't created equally and conversion to sprinklers in some areas may actually decrease instream flows, prevent channel migration, and reduce riparian vegetation or limit its height. Please add Managed Grazing as a stewardship practice for Objective 4; A better definition of "pest" management would be helpful—beavers are often considered pests in urban and agricultural areas, but are a keystone species for a functional watershed.; Please add a 6 <sup>th</sup> Objective stating "Protect and enhance perennial grass vegetation in shrub-steppe areas." Managed grazing could be a key stewardship practice (especially timing and rotating).	Remove "or" from goal for all tables. <i>See response to comment 181. Should be discussed briefly by the Watershed Group.</i>  Add to function table: Provides shrub-steppe habitat for wildlife by maintaining connectivity and quality necessary to support all life stages of game and non-game wildlife (perennial grasses, forbs, shrubs)  Add conservation easement, range planning, and managed grazing as noted in comment. Restoration planting is included in habitat restoration and tree/shrub establishment which are already included in the table. Salt and mineral supplements are included in managed grazing. Stream and streambank protection and restoration practices provide floodplain roughness.  In the context of protecting wetlands, sprinklers may be appropriate practice if the resource concern is the transport of sediment and nutrients into adjacent wetland habitats. A sprinkler system is not the appropriate practice for all sites. Selection of the appropriate practice for the goal (e.g. wetland restoration) will be determined by specific conditions at the site.  Add as footnote for Pest Management: Practices which more efficiently apply crop protection tools to reduce nutrient runoff or use alternative methods of pest reduction  Add 6th objective as noted.	
183	Lila Hanson	5	47	Table 5-2	Should bullet be added re- nutrient, pests, and water management that identifies "pests" (like elk)? Reducing their damage also what is trampling of habitat – Does that include done by recreation and trails – trails especially damage ag viability and forestry components	Pest management is specifically related to practices that more efficiently apply crop protection tools to reduce nutrient runoff or use alternative methods of pest reduction, this does not include management of species such as elk.  VSP does not regulate recreation, only agricultural activities as defined by statute.	
184	Lila Hanson	5	47	743	Watering facilities? Small and diverse dams and ponds?	Watering facilities provide drinking water to livestock and can keep livestock out of streams or other areas of water quality concern.	
185	John Marvin (Yakama Nation)	Table 5-2	47		Habitat Row – Wording here is awkward; "Provide", "Provide", "Support". Recommend rewording for better clarity on applicability to all HAC.	The language "provides" and "supports" refers to the fact that critical areas provide and support a range of habitat functions as described in each table.	
186	Lila Hanson	5	49	746	Stewardship-small dams, ponds, irrigation methods that allow surface of well water to become groundwater	Add Wetland Enhancement/Restoration as a key practice for first objective in Table 5-1.	
187	Lila Hanson	5	50	749	Why are we calling erosion a geologic hazard? Does it include eroding river banks?	Erosion will be designated as a GHA in updated CAO. See updated Section 2-3 and Appendix B-3. Eroding river banks are part of the channel migration zone, which will also be updated in the updated CAO.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
188	Jen Nelson (WDFW)	5.1	50	Table 5-4 749	For the key functions in hydrology, please incorporate language about maintaining flood capacity (alluvial channels) and natural processes such as channel migration. Alluvial fans and channel migration zones are both included in the geologic hazards critical area and are big factors in Kittitas County (WAC 365-190-120(6) h & f). While we wouldn't expect a big change in Agricultural practices for these critical areas, it will be important to maintain channel capacity in places that may be filled in as part of an ag practice. An example—many irrigation ditches are actually relic channels that have been managed as irrigation systems for more than 100 years. During flood events, these "irrigation ditches" convey flood waters as part of the alluvial fan. As pipelines and sprinklers go in and diversions are consolidated, there is a desire to fill these channels. If the channels are filled, flood waters will no longer be conveyed in a channel and have the potential to be more destructive/erosive. Manastash Creek has some really good examples of where this could occur. A key stewardship practice should also include riparian planting for long term bank stability and/or a more general vegetation management bullet (leave it on steep slopes and/or replant it in vulnerable areas). Most of the producers I've talked to say they get their most erosion/damage to fields when floods hit freshly tilled/seeded fields. Perhaps there is some sort of temporary cover crop that would help reduce risk under these circumstances? For existing plans, as part of the SMP update, CMZ maps were produced at a coarse scale for Shorelines; they're available on the County's SMP site.	Add to function table under Hydrology: Channel migration zones and alluvial fans help to maintain flood capacity and natural channel migration.  Add cover crop and residue management as Key Stewardship Practices to the 3rd Objective under FFAs	
189	John Marvin (Yakama Nation)	Table 5-4	50		Key Stewardship Practices – Add riparian and floodplain planting.	Revise as noted.	
190	Lila Hanson	5	51	752	Does vegetation here also mean farm crops?	Yes, as perennial grasses (like hay) do provide protection for soil in the frequently flooded areas but in general, it refers to woody species that have more extensive root systems and a greater ability to slow surface water and capture debris and sediment.	
191	John Marvin (Yakama Nation)	Table 5-5	51		Key Stewardship Practices – Add floodplain restoration, including dike/levee/road removal/setback, and the addition of woody materials to the stream channel.	Revise as noted.	
192	Jen Nelson (WDFW)	5.2.1	52	762	We have concerns that implementation of stewardship practices will be used to demonstrate protection of critical areas. It very much depends on specifics of a site, actions implemented, and critical areas present before you could determine that implementation of a practice is actually protecting a critical area. The methods proposed to essentially measure how many producers say they'll implement a practice on their land gives very little confidence there will be any direct benefit to critical areas.	This VSP only tracks implemented and maintained conservation practices, not "how many producers <u>say</u> they'll implement a practice". This approach is also predicated on the understanding that agricultural stewardship has benefits to critical area functions and values even if they are indirect (not over or adjacent to critical areas themselves). The functions and values are based on ecosystem functions and processes that operate at a landscape scale. Conservation practices have known effects on critical area functions and values at the watershed scale as quantified and described by the NRCS in the CPPE scores. Indicators will act to determine if conservation practices are having the desired effect on critical areas functions and values (Section 5.3). Additionally, direct and indirect monitoring of conservation practices will also occur to ensure these practices are being implemented correctly (Section 5.4).	
193	Kat Satnik (KCWP)	5.2	53	787	Spell out and define CPPE before using the acronym in the text. There is a helpful box, but it's at the bottom of the page, and separated from the first usage by other text and graphics.	CPPE is defined on its first mention in the main document in Section 5.1 in the "Key Stewardship Practices" section.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
194	Heather Kosaka (Ecology)	5-2	53	794	Change, "Under VSP, the relative changes in function affected from a given conservation practice will be tracked, e.g., a +4 increase moving to from a -2 to +2, rather than the CPPE score of +2" to, "Under VSP.... a +4 increase moving from a -2 to a +2, rather than the CPPE score of +2."	Revise as noted.	
195	Heather Kosaka (Ecology)	5-2	54	819	Rapid Watershed Assessments: "Resource concerns and locally appropriate stewardship practices to address these concerns." I may have missed this (in Appendix C?) maybe describe why you are using community planning areas (instead of WRIAs) somewhere in the work plan narrative.	The reference should be to Appendix B-2, which provides specific information for each planning area including specific stewardship practices to be prioritized in each area. Update reference to Appendix B-2 and confirm Appendix references throughout the document.  Add to section 2.4 Community Areas after sentence ending on line 270: Community Areas were chosen instead of WRIAs for the purposes of focusing planning efforts on areas of similar agricultural types, which facilitates goal setting, outreach, and implementation.	
196	Jen Nelson (WDFW)	5.2.1	54	819	Resource concerns identified should correlate with the critical areas and are not necessarily the resource concerns identified by NRCS through their processes. For the purposes of VSP, we should probably be looking at resource concerns associated with habitats a CAO would regulate and that are measurable.	Correct, KCCD used the Rapid Watershed Assessment tool to develop resource concern goals specific to VSP goals.	
197	Jen Nelson (WDFW)	5.2.1	54	824	We understand and agree that some practices will have direct and indirect effects, but depending on the practice, it may not be as simple as the practice's adjacency to the critical area. Also consider that multiple critical areas may be present (stream, riparian, frequently flooded area, CARA, wetland, CMZ) and the practice needs to consider effects to each (beneficial or negative) when scored.	Comment noted.	
198	Lila Hanson	5	54	824	Indirect effects count toward but not against? And since 100% of ag is habitat and public lands are often nearly proximity be considered a factor?	Change line 825 to clarify, "but still influence critical area functions and values. These influences are typically positive where conservation practices are implemented and negative where they are discontinued.	
199	Heather Kosaka (Ecology)	5.2.2	55	841	"In predicting benchmark values for enhancement, KCCD typically assumed 70% implementation would likely occur within the first 5-year reporting timeframe (2021) ...and 30% would occur within the second 5-year reporting timeframe (2026)." Are these assumptions listed or described somewhere in the plan?	Due to the known level of funding before 2020, it is assumed that much of the enhancement practices will be implemented in the next 5 years whereas funding after 2020 is less certain. Update text to read: In predicting benchmark values for enhancement, KCCD based implementation of enhancement practices on known funding in the short term assuming typically assumed 70% of implementation would likely occur within the first 5-year reporting timeframe (2020) and 30% would occur within the second 5-year reporting timeframe (2025.)	
200	Jen Nelson (WDFW)	5.2.2	55	833-839	Review of Appendix C will be really helpful to evaluate this table. At first glance, the table feels overly simplified at least for fish and wildlife habitat protection/enhancement as it relates to the practices. We are concerned that this section and the benchmarks focus too much on what we are doing (already) and less on why we're doing it (in this case, the critical areas protection/enhancements).	Comment noted. Appendix C was provided to the Watershed Group 1/13/2018.	



Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
201	Jen Nelson (WDFW)	5.2.2	56	Table 5-6	<p>We need to better understand the actual NRCS practices referenced and how the CPPE scores each practice to provide more comprehensive review of this table. Irrigation Water Management scores nearly as high as riparian buffers for habitat and higher than fencing; pest management has a positive score for habitat, but under Ag Viability includes removal of nuisance species (this probably includes beavers which are a keystone species). Also, the relatively low scores these practices have for Ag Viability are concerning and confusing given the number of producers lined up to install sprinklers. How often and where are the cover crops and mulching applied?</p> <p>We recommend that the habitat columns be subdivided into at least 3 categories (instream, riparian, &amp; shrub-steppe/forest) to account for different impacts of different practices on different habitats. This recommendation is for the CPPE scores and the CA protections. We also recommend that the CA protections categories be labeled with +/- for a positive or negative impact associated with the stewardship practice. Why is Range Management not covered under Habitat management? Generally speaking, range in Kittitas County is shrub-steppe habitat or forested.</p> <p>Fencing is an example where you could have livestock exclusion fencing near a riparian buffer, or cross fencing in a shrub-steppe pasture. Where the fencing is located matters as to the degree of benefit to habitat (and the types of habitat). Is this wildlife friendly fencing? Is it marked to limit wildlife collisions? We have agreed that producers don't have to apply NRCS standards to be acknowledged as providing benefit—but details matter when considering the critical area impacts associated with an individual practice.</p>	<p>Comment noted.</p> <p>CPPE scores were updated to match the most current version created by NRCS. A full list of the CPPE sub-categories are provided in Appendix C.</p> <p>Range management includes practices specific to the management of livestock while habitat management refers to protection and enhancement of habitat which could occur on any agricultural type.</p>	

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202	Jen Nelson (WDFW)	5.2.2	57	Table 5-7	Again, a better understanding of the NRCS practices would be helpful and/or more generalized topics with brief descriptions instead of listing the actual practice code; Range Management should be included in Habitat Management as much of the range occurs in shrub-steppe or forested habitat and there will likely be direct intersects with that critical area.; Many of the "indirect" intersects could be direct intersects-how were these categories defined at this coarse of a scale?; If we understand this table correctly, we're measuring success (in terms of critical area function) based on the number of (NRCS) practices applied. We have yet to see on the ground information on how the acres under pest management result in critical areas protections as one example.; we are uncomfortable only using the number of practices applied as the measuring stick for critical area protection or enhancement. The no net loss in riparian function should be based roughly on what we had in 2011; Can we use aerial photography and/or change detection to analyze the actual changes in riparian cover to verify the usefulness of the NRCS datasets and what we receive from landowners with the sign up sheets? For the protection and enhancement benchmarks, we'd prefer some descriptors of the quality and/or type of habitat present. This will be challenging for baseline, but we could set benchmarks for enhancement that focus on improving function of critical areas and not solely the number of ag practices applied in the county.; For the benchmarks, it's important to note that these are the acres adjacent to critical areas or where there can be a critical area interaction/impact; In general, this table is confusing and it's not clear what the 2011-2016 Average Annual numbers are—are they the annual average for during those years or the total number during those years? Why are subsequent numbers less? Are the Objective numbers in addition to the 2011-2016 numbers or total?; who is monitoring the effectiveness of the practices installed to ensure they are really happening? How do we ensure riparian shrubs are not sprayed shortly after installation?; How do these numbers of acres account for conversion of agricultural lands to development or other uses?	See response to comment 201.  See discussion of use of aerial imagery in Section 5.3. See discussion of baseline condition in Section 3. See Section 4.2 and 5.2 for discussion of disenrollment. See Section 5.4 and Section 6 for discussion of monitoring and reporting. See response to comment 174 regarding land conversion.	
203	Heather Kosaka (Ecology)	5.3	58	876	"Indicator data will be reviewed at least every 5 years to help focus technical assistance efforts and assess if the anticipated protection and/or enhancement of critical area functions is occurring." The work group should incorporate ground water quality status into the VSP biennial reports.	Add after sentence ending on line 894: Groundwater quality can be monitored through groundwater monitoring stations maintained by the Washington State Department of Ecology, which can be found at <a href="https://ecology.wa.gov/Research-Data/Monitoring-assessment/Groundwater-quality-assessment">https://ecology.wa.gov/Research-Data/Monitoring-assessment/Groundwater-quality-assessment</a>	
204	Jen Nelson (WDFW)	5.3	58	878	Comparing stewardship practices to an indicator's loss or gain is not enough. The analyses of the effectiveness of the practice in protecting the critical area function needs to occur and/or at a minimum whether or not the practices were implemented correctly. We need another sentence or two detailing what we do after we compare them.	See Section 5.4 for discussion of direct monitoring.	
205	Lila Hanson	5	58	883	Over and over <u>CAF</u> are mentioned but not ag viability why not? Where will ag viability and enhancement be part of this work plan?	While the Work Plan may not have specific goals and benchmarks for agricultural viability, the effect and relationship of proposed critical area protection measures on agricultural viability is included throughout the document. For example, Tables 5-1 through 5-5 identify how critical area protection objectives will be achieved while also sustaining agricultural viability. Table 5-6 also includes agricultural viability CPPE scoring for key stewardship practices identified in the Work Plan. Table 5-8 further provides adaptive management measures to address conditions where key practices are not consistent with agricultural viability.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
206	Kat Satnik (KCWP)	5.3	58	887	Along with 303(d) listings, why not include the results of local water quality monitoring?	Add as last sentence: In addition, local water quality monitoring will be included as applicable.	
207	Jen Nelson (WDFW)	5.3	58	895	With the altered hydrology we have in most of Kittitas County, what indicators are you looking for in the hydrology? The Groundwater monitoring and more fine scale trust water monitoring are likely better indicators for critical area functions and values than the mainstem gauges.	Water availability for fish and wildlife are the main indicators for hydrology with regard to critical area functions. During implementation appropriate data will be identified based on availability and relevance to fish use.	
208	Kat Satnik (KCWP)	5.3	58	901	KRD monitoring data available is not available online as stated.	Remove reference to online location.	
209	Heather Kosaka (Ecology)	5.6	56	851	How did you come up with Ag viability CPPE? How is a CPPE score different for say, Irrigation Water Management for soil function vs. ag viability.	NRCS maintains CPPE scores for a range of categories, the agricultural viability categories include soil health, prevention of soil loss, moisture management, weed and pest management, pollinator and beneficial organisms, and yield and fertility management	
210	Jen Nelson (WDFW)	5.3	59	912	Why are the habitat indicators the only ones with the qualifiers of “adequate resources provided”? We understand the need for funding in order for VSP to be successful and support that, but please include this qualifier in an introduction paragraph or for all indicators.	Move the reference of “adequate resources provided” to line 886, that is applicable to all indicator evaluations.	
211	Jen Nelson (WDFW)	5.3	59	914	Random sampling of what percent of critical area/ag intersections per community area? A random sample should be random—meaning not necessarily identifying properties to include that have opted into VSP as that could skew the data. More details on how this will be achieved would be helpful. Random sampling design will need to be statistically robust. We believe the high resolution change detection will be effective in accurately tracking changes to riparian habitats (although ground-truthing would still be required—particularly where replacement of crack willows with native species occurs). We are less certain that HRCD will be effective in measuring the quality of habitat (ie: perennial grasses in shrub-steppe), but it would certainly pick up conversions of shrub steppe to other types of more intensive agriculture.; In addition to fish abundance and distribution, wildlife (such as big horn sheep, sage grouse) will be important indicators.	Level of analysis of indicators will be dictated by the quality of the data, available technologies, and the level of funding provided. Details of the means and methods are not included in this plan, only the standards and objectives. This gives flexibility to use emerging technology and maximize the available funding without committing to unfunded monitoring.	
212	Lila Hanson	5	59	911-929	Habitat indicators – can another be added – a DOT and other roads groups accounting of removal of “large meaty debris” from all roads and roadsides in HCA	Transportation specific practices are not applicable to VSP.	
213	Lila Hanson	5	59	931	If comments 184 and 136 lead to “section addressing climate change” using the box described in comment 136, can that response change “increasing” to “changing” and eliminate the second increasing in its first sentence	Revise as: ...changes to peak and average stream temperature...	
214	Heather Kosaka (Ecology)	5.3	59	931	“Indicators may not be determinative of VSP success in maintaining 2011 baseline or better conditions as affected by agricultural activities as opposed to other changes at the landscape scale such as urbanization, fire events, long term climatic events.” Yes-climate change is a key stressor that could undercut some of the advances made through VSP. A section addressing climate change would be valuable.	See response to comment 136.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
215	Heather Kosaka (Ecology)	5.3	59	917	For wetlands mapping, both NOAA (coastal change analysis program) and USGS NLCD (National Land Cover Database) are in the middle of a 2016 update. NLCD has not instituted any effort to improve the mapping of wetlands in their past work but will be doing so as part of their 2016 update. NOAA believes it will produce a product similar to CCAP for the interior portion of the state. You can expect NLCD data to be released Jan/Feb 2019.	Comment noted. These are the types of data that could be included in the 5-year reports if made available to KCCD.	
216	Heather Kosaka (Ecology)	5.3	59	915-917	After imagery evaluation of random sampling of areas and analysis results are summarized, what will you do with the results if you find a discrepancy? Who (Conservation district, County, technical provider) will update the maps?	Results from the imagery evaluation would be contained in the 5-year reports, but could be used more frequently to improve VSP effectiveness through adaptive management. Any updates to the mapping would be done as needed for reporting and implementation, contingent on available funding and the needs of the VSP program.	
217	12/18 WG Meeting	5.3	59	922	Add definition of ground-truthing.	Add as footnote: Ground-truthing refers to the practice of comparing data received by remote sensing to existing conditions of the area to determine if remotely sensed data accurately captures characteristics of real life conditions.	
218	Jen Nelson (WDFW)	5.4	60	942-945	Step 1 is "Assess", but it isn't represented in Figure 5-3. Just for consistency, use the same terms in the figure and text.	Update to match diagram.	
219	Jen Nelson (WDFW)	5.4	60	949	We have concerns about changing the benchmarks in the middle of the process. One could interpret this as "if you're not meeting the bar, lower the bar"—we don't believe this is the intent, but please clarify.	Change second sentence to clarify. These updates would only be used to reflect changes in the conservation practices implemented, their measured effectiveness, or approved updates to the goals. The standard of protection (no net loss of function from the 2011 baseline) would always remain.  Note to Jen: the Watershed Group can modify the enhancement benchmark, with WCC approval.	
220	Jen Nelson (WDFW)	5.4	61	961	We have concerns about adjusting the goals in the middle of the process. Same general comment as above.	Change "goals" to "objectives"	
221	Jen Nelson (WDFW)	5.4	61	964-965 box	Please be more clear that the baseline conditions are in 2011; we won't be making changes to those conditions now. As part of the evaluation period, the watershed group can identify natural events and account for them at that time.	Change as shown: <b>Considering the Changes to Baseline Conditions</b> It's important to note changes to baseline conditions <u>outside of VSP</u> are likely to occur <u>that are unrelated to agricultural activities. These may be</u> due to effects from climate change, natural events (e.g., floods, wild fires), or other changes outside of the scope of VSP (e.g., forest practices). Additional changes to baseline may occur in the County that are the result of activities outside of the County. <u>such as effects to watercourses that occur upstream and outside of the County limits.</u> These changes will <u>not</u> be <u>accounted for in the reporting but will be considered as changes to the baseline conditions. Changes to a baseline condition will likely have the effect of also changing the associated protection benchmark. These updates to the baseline</u> against agriculture for VSP assessment purposes will be documented through the reporting and adaptive management process.	
222	Jen Nelson (WDFW)	5.4	61	972	It is concerning to us that producer participation is the primary measure for critical area protection. The sample verification described should be increased and we need a better understanding of how the CPPE directly relates to each critical area and the functions and values it provides.	Indicators provide an understanding of how conservation practices affect critical areas functions and values.	
223	Jen Nelson (WDFW)	5.4	62	989	Please clarify who the "Implementer" is. Also in this section, we want to "understand the situation and correct it."	Change "implementer" to "VSP Implementation Lead (KCCD)" which is assumed to be KCCD as described in Section 6.	
224	Kat Satnik (KCWP)	5.4	62	1002	Include urbanization as a potential change driver, especially in areas with indirect impacts to critical areas.	Revise as noted.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
225	Jen Nelson (WDFW)	5.4	63	Table 5-8	The objectives and metrics are very vague in this table, but the causes and adaptive management actions are helpful; Who is the VSP Coordinator?; The number of checklists submitted isn't necessarily an indicator of an active participant so that may need adjusted for Objective 1; Please define "passive participation"—does this mean do no harm or don't make it worse or just that they didn't fill out a checklist?; For Objective 2 monitoring, it's not really random sampling if you're only talking to willing landowners.	Revise: VSP Coordinator ( <a href="#">KCCD</a> )  Passive participation is defined in the table notes.  Due to practices occurring on private property, permission must be granted before sampling. Therefore, sampling can only occur on the property of willing landowners.	
226	Heather Kosaka (Ecology)	5.8	63	1013	Table 5-8 Identified cause/Adaptive Management Threshold heading. These are two distinct things, suggest inserting an extra column with measurable thresholds (can be an adaptive management action threshold, i.e. a 10% reduction of conservation practices.)	The Adaptive Management Threshold is repetitive with the metrics in Table 5-9. Replace "Identified Cause/ Adaptive Management Threshold" with "Potential Cause"  Replace "Decline below the annual average enrollment rate identified in Table 5-9 in key stewardship practices" with "Decrease in passive participation in VSP" in the second row and "Decrease in either active or passive participation in VSP" in the third row	
227	Jen Nelson (WDFW)	5.4	64	Table 5-9	We are confused by this table as well; the adaptive management objective is essentially the stewardship practice we think, but they are not consistent with Tables 5-6 and 5-7; Channel bed stabilization and streambank protection are not necessarily stream enhancements—it depends but they could result in negative impacts to instream habitat, riparian habitat, CMZ, Alluvial Fan, Floodplain, and wetlands (ie: multiple critical areas). Please provide better definitions.; What is the difference between monitoring and visual recognition? Do these include critical area function or just implementation of the practice?	This plan assesses the impacts of projects meeting NRCS specifications for conservation practices. The benefits of these practices have been quantified using CPPE. Other projects will be assessed by KCCD to determine their effect on the four functions. This will address your point that these projects can have a variety of benefits and detriments. It is assumed that bank stabilization projects are permitted and, under an HPA, must not harm aquatic species.  NRCS practices do provide benefits, although it is understandable that the simple practice titles convey little in the way of details of the actual work implemented and the process to get there. For example the NRCS practice "Channel Bed Stabilization" (practice code 584) includes the following scenarios: Channel Spanning log jams; Log Weirs; Rock Structure; Roughened Channel; and Spawning Riffles. "Streambank and Shoreline Protection" (practice code 580) includes these scenarios: Bioengineered; Bioengineered w/ Logs; Bioengineered, rock toe; Large Wood Structure with rock toe; Large Wood Structures; Log Matrix; and Rock Rip Rap. Per NRCS procedures, an NRCS Engineer and Fish Biologist must be consulted and concur for all scenarios of both of these practices as they are designed and implemented. If this practice were used by the KCCD for a project not involving NRCS funding or staff, the project would be designed by a licensed engineer and permitted as required by the funding source and in compliance with state law.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
228	Jen Nelson (WDFW)	5.4	65	Table 5-10	In the goals, please identify which critical area they apply to; Stream flow gauges won't tell us much about goal #2, groundwater storage may actually decrease with sprinkler conversions and more water conservation practices applied (vs. flood or rill irrigation). If that occurs, non-agricultural related practices such as large scale floodplain restoration may mitigate for this loss, but will not result in the net gain intended by the restoration project. How will this VSP plan monitor these fine scale differences in ground water storage?; For Goal #4, it's challenging to lump all habitats into a single goal as we may have improvements in one habitat type and degradations in another. We recommend at a minimum separating into instream, riparian, and Shrub-steppe/Forest habitat types. The PHS data will not be fine scale enough to monitor individual species through time, so for VSP, most of the focus should probably be on habitat types. High Resolution Change Detection is a really good option for this type of monitoring. We'd encourage a statistical analysis for the random sampling schemes described throughout the document so the data will be defensible.; For the fish species adaptive management objective, it seems we should focus more on miles of stream opened up, acres of riparian plantings, or large wood habitat projects on lands subject to VSP. Too many factors are related to the actual fish distributions and abundance—ocean conditions and hatcheries are two that most immediately come to mind. Fish abundance and distribution is important to convey to producers and landowners, but I'm not sure we should use it as a performance metric for VSP.	Comment noted. Table 5-10 refers to the critical area functions and values (water quality, hydrology, soil, and habitat) and not to critical areas individually. This is the same approach as described for the Indicators in Section 5.3.	
229	Heather Kosaka (Ecology)	5.10	65	1025	Indicator data source, Water quality stations. Yes, mapping well locations with groundwater quality data and producing graphs is very important for identifying locations with impaired groundwater quality and looking for trends.	Comment noted.	
230	Heather Kosaka (Ecology)	5.10	65	1025	"Adaptive management action: survey with outreach to ag producers along floodplains and within CARAs to determine percentage of participation in stewardship". Yes- for CARAs participation is most important in areas where ground water tends to be contaminated from activities at the land surface. Community areas (larger areas broken down into subareas) should make this easier to address.	Comment noted.	
231	Jen Nelson (WDFW)	5 (General)			Biodiversity/Migration Corridors will soon be incorporated into our PHS data based on BAS in the Arid Lands Initiative and the Washington Connected Landscapes efforts. The corridors through private lands connecting shrub steppe habitats are of critical importance to sage grouse recovery and many other species of wildlife.	Comment noted.	
232	Jen Nelson (WDFW)	5 (General)			We aren't sure where to include this, but bighorn sheep proximity to domestic sheep (and goats) can pose a major threat to their population. Please ensure proximity to wild bighorn sheep range is a consideration of grazing management recommendations with individual stewardship plans.	Comment noted.	

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
233	Jen Nelson (WDFW)	5 (General)			We don't deal at all with fire and how it impacts critical areas (particularly shrub steppe and forest) and agricultural viability. It's in everyone's best interest to minimize fire risk—is there a section we could address this? Shrub steppe habitat is particularly challenging to restore. Is there a place in the narrative to discuss fire a bit and/or BMPs we can collaborate on to reduce risks to habitat and agriculture?	Fire is not applicable to VSP since fire is not an agricultural activity.	
234	Jen Nelson (WDFW)	5 (General)			If relying heavily on NRCS practices and their funding to implement VSP, we need to ensure practices that will protect/enhance critical areas are offered to producers. Protection of critical areas should be reflected in the local work group's scoring of projects as well. NRCS resource concerns do not necessarily reflect the critical area functions and values VSP needs to reflect unless our local work group ensures they do.	Comment noted.	
235	Jen Nelson (WDFW)	5 (General)			Riparian strips along our tributary streams would be a huge benefit for instream and riparian habitats. This is hard to quantify and/or measure with the approach we've taken, but we hope that there is opportunity within the narrative to address this issue and that the work group shares this goal. Kittitas County is unique in that we have so many tributaries crossing our ag lands. We believe there are opportunities to enhance the vegetation along these streams that will be consistent with maintaining ag viability.	Comment noted.	
236	Kat Satnik (KCWP)	6.2	69	1076	Change to/add tracking period at levels supported by the economy and available funding sources as described below.	...tracking period <a href="#">at levels supported by the economy and available funding sources as described in this Section.</a>	
237	Lila Hanson	6	69	1082	Will there be VSP dollars available for this?	Assumed funding for technical assistance and outreach is stated in Table 6-1.	
238	Lila Hanson	6	69	1085	Are there to be formal and recorded plans?	Yes, these will be developed through coordination with the KCCD.	
239	Lila Hanson	6	70	1096	Does this assume "conventional farming" is anti-CA?	Revise: ...along with documenting any lands <a href="#">converted from stewardship practices back to more conventional farming—where stewardship practices are no longer implemented.</a>	
240	Kat Satnik (KCWP)	6.2	70	1096	A conversion "back to more conventional ways" shouldn't be assumed to have a negative impact on the critical areas. Technology may be tried that fails, or is actually more harmful to the environment (DDT, eg).	See response to comment 239.	
241	Lila Hanson	6	70	1111-1112	Could "public-sector" and "private sector" be described? Preferable in a glossary.	Add as footnote: Public-sector refers to agencies or organizations of federal, state, or local governments <a href="#">or to government appointed organizations (e.g. KCCD)</a> Private-sector refers to organizations that are independent of governments	
242	Lila Hanson	6	72	1158	Strike last 4 words and substitute "empower the state to regulate"	Revise: The GMA was passed by the Washington State legislature in 1990 to help the state manage <a href="#">and regulate</a> the growth of development and activities	
243	Kat Satnik (KCWP)	6.4	73	Table 6-4	Add KCWP; Provides technical assistance to landowners to increase water quality related to irrigation practices and habitat improvement.	Revise as noted.	
244	Lila Hanson	6	74	1187	Shouldn't there be a long list of not for profits listed here – given they are often taxpayer supported, they have a lot of clout and influence	This section is meant to give an overview, not to list all possible service providers.	
245	Lila Hanson	6	74	1202	... and they impact many critical area F&V...	Comment noted.	
<b>Appendices</b>							

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Proposed Response	Further Discussion Needed?
246	12/18 WG Meeting	A	2		Make the second paragraph of the "Policy Note" bold.	Revise as noted	
247	12/18 WG Meeting	A	4		Add "Since 2011" to the title of page 4	Revise as noted	
248	12/18 WG Meeting	A	5		Add Kittitas County Water Purveyors and Washington Farm Bureau to "Other Local Resources"	Revise as noted	
249	Dale Rusho	B-5		8	Some consider hay export as water export	Comment noted.	
250	Dale Rusho	B-5		34	Would seem beneficial to the U S	Comment noted.	
251	Dale Rusho	B-5		86	Deterioration to the infrastructure	Add to Weaknesses: Deterioration of infrastructure	
252	Dale Rusho	B-5		130	Yes	Comment noted.	
253	Dale Rusho	B-5		138	Can we maintain meander or improve	Revise: Allow farmers to maintain and improve creeks and water ways	
254	Dale Rusho	C			Overwhelming	Comment noted.	
255	Dale Rusho	D			Too much regulation	Comment noted.	
256	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).	Add summary of specific goals and objectives incorporated from existing plans. Include this summary in Section 5.1.	Yes
257	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.	Consider adding 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.	Yes
258	Tech Panel (comments on other Work Plans)	5.3 and 5.4		Table 5-10	Add wetland data to monitoring methods for aquatic habitat.	Add the following additional data to monitoring methods for wetlands in Section 5.3 and Table 5-10: U.S. Department of Agriculture Natural Resources Inventory monitoring results and the National Wetland Inventory through U.S. Fish and Wildlife Service	Yes
259	Tech Panel (comments on other Work Plans)	6.2.1			Add discussion on how critical areas how presence of critical areas on agricultural lands will be documented through farm stewardship plans and implementation.	Revise as follows: KCCD will prepare biennial work plans that incorporate public-sector activities to be implemented to achieve VSP outreach and technical assistance objectives, and will identify plans for working with the private sector to capture information about practices put in place <u>and presence of critical areas</u> through its efforts.	Yes
260	Tech Panel (comments on other Work Plans)	Appendix E Outreach Plan			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	No