

Kittitas County VSP Work Plan
Response to Technical Panel Comments
April 11, 2018

Agency	Element [A]	Element [A] Explanation	Element [B]	Element [B] Explanation	Element [C]	Element [C] Explanation	Element [D]	Element [D] Explanation	Element [E][i]	Element [E][i] Explanation	Element [E][ii]	Element [E][ii] Explanation
Commission	Meets	Tables 5-1 through 5.5 identify how other plans were incorporated. See also pg 89 for brief summary and Appendix D, pg D-6.	Meets	Workgroup (called Watershed Group?) described in Appendix E. Appears to represent ag and other stakeholders. Very good description of participation (or lack of) by tribes and environmental organizations. See also WP pg 4-5.	Meets	Participation context (currently 10%) found in highlight box on page 83, line 1283. Unclear if goals in Table 5-8 will be sufficient, but adaptive management is identified so if not, changes are described.	Meets	Role of KCCD identified on page 84, section 6.2.1. See also WP pages 81-82.	Meets	Benchmarks in table 5-7 use units of conservation used for measurement of participation, as with other plans. Concern, as with other plans using this model, using average of 2011-2016 as baseline without consideration of variability (the reasoning provided for using average in the first place) may result in benchmark set too low to protect or enhance. Better to conservatively place benchmark as 1 (or 2) standard deviation(s) above average. With adaptive management, will need to be very aware of assumption made in setting benchmarks.	Meets	Same
Agriculture	Meets		Meets		Meets		Meets		Meets		Meets	
Ecology	Meets		Meets	Meets, but could have more information in the plan	box on p. 83, clarify if this means that the participation goal is >10% consistent with the outreach goals in appendix E.		Meets	community planning areas, please clarify if and how the community planning areas are going to be used in outreach efforts.	Meets	The work plan states: Characteristics and functions overview: CARAs provide protections to public drinking water supplies by providing sufficient area for water to filter through the soil column. In addition, CARAs affect groundwater quality and hydrology by providing adequate groundwater infiltration. <input type="checkbox"/> The definition of functions and values of Critical Aquifer Recharge Areas is fundamentally incorrect - They mention the value of the ground filtering pollutants, and this is not the function and value of CARAs. <input type="checkbox"/> The functions and values of Critical Aquifer Recharge Areas are to provide clean, safe, available drinking water.	Meets	
Fish & Wildlife	Meets		Meets		Meets		Meets		Meets		Meets	
Kittitas County VSP Work Group Comments	-	No response necessary	-	No response necessary	-	See attached Response Matrix - response to comment 6.	-	Response to Ecology comment - see attached Response Matrix - response to comment 9.	-	Commission comment noted. See also Table 5-9 (page 77) that sets the adaptive management trigger at 120% of the performance metric. Response to Ecology comment - see attached Response Matrix - response to comment 2.	-	No response necessary

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Agency	Element [F]	Element [F] Explanation	Element [G]	Element [G] Explanation	Element [H]	Element [H] Explanation	Element [I][i]	Element [I][i] Explanation	Element [I][ii]	Element [I][ii] Explanation
Commission	Meets	Roles identified in Table 6-1. See also WP pgs 83-84.	Meets	Roles identified in table 6.1 See also statement on pg 83. Will use "Community Planning Areas" instead of watersheds.	Needs clarification	No definitive statement found to clearly identify that this plan is stand-alone. Assume this is the case per Section 6.4.4 on pg 90, but would be better with a statement that no other development regs are relied on to achieve goals/benchmarks.	Meets	Monitoring methods identified in Table 5-8 See also note on Ei above.	Meets	Monitoring of stewardship identified in table 5-7. See also note on Ei above.
Agriculture	Exceeds		Meets		Meets		Meets, but could have more information in the plan	On Line 1197, Table 5-10, suggest changing the monitored metric under adaptive management from Cat 4 and 5 to include Category 2, which is a more appropriate early indicator of degradation.	Meets	
Ecology	Meets		Meets, but could have more information in the plan	it would be helpful to add practices for Hazardous Materials Management onto the Stewardship Checklist since they are conservation practices that protect CARAs.	Meets		Needs clarification	please clarify if the participation baseline is 10% as noted on p. 83.	Meets	please describe what the relationship is between the conservation cost tables in App. B-2 and tables 4-3 and 4-4. consistent language between the tables would be helpful. for example how do progressive practices and RMS practices (a definition of them would be helpful) related to the NRCS practices. are the tables in appendix b-2 meant to capture practices that are not NRCS funded or NRCS practice. for CARAs an average CPPE score is not as relevant as actually counting practices to avoid contamination of ground water.
Fish & Wildlife	Meets		Meets		Meets		Meets		Meets	
Kittitas County VSP Work Group Comments	-	No response necessary	-	Ecology comment noted. The Work Group did not identify management of hazardous materials management as a key practice for the County's Work Plan due to very limited intersects of CARAs with agricultural lands.	-	As described in Section 6.4.4 and Appendix D, other applicable regulations will still apply; however, critical area protections required under GMA will be provided under VSP for all of the County's critical areas for all agricultural activities.	-	Agriculture comment - see attached Response Matrix - response to comment 4. Ecology comment - see attached Response Matrix - response to comment 6.	-	See attached Response Matrix - response to comment 10.

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Agency	Element [I][iii]	Element [I][iii] Explanation	Element [J]	Element [J] Explanation	Element [K]	Element [K] Explanation	Element [L]	Element [L] Explanation	Other comments on the Work Plan
Commission	Meets	CA monitoring found in Table 5-10. Concern, as with other plans of this model, small data sets may not provide an adequate picture of critical area response, leading the workgroup to conclude CA function is okay, when it has actually declined. Analysis should include an assessment of whether or not enough data was collected and how much more is needed, then adaptively manage to collect the necessary data.	Needs discussion	Some discussion found in Section 6.3 See also WP page 72, Section 5.4 - adaptive management only at the 5 year interval. Unclear if this is meaningful for the CA's of interest.	Needs discussion Needs clarification	No statement indicating Workplan assistance to agencies. Checklist table at beginning of document does not adequately describe how agencies will be assisted.	Needs discussion Needs clarification	No statement indicating who's responsible for "other reporting requirements". Checklist table at beginning of document lists the requirement, but referenced section does not identify the "other" requirement.	
Agriculture	Meets, but could have more information in the plan	See comment on I[i]	Meets		Meets		Needs clarification	Add statement to cover future reporting efforts as required.	great workplan - I am excited to see implementation in Kittitas County!
Ecology	Meets	Good description of how habitat indicators will be monitored.p.71 <input type="checkbox"/> The work plan restricts the definition of a Critical Aquifer Recharge Area to 100 foot buffers around Group A and Group B wells. This resulted in just 9 acres being identified as CARAs with Agricultural Acres, yet the Kittitas Valley is primarily agricultural. This is too limiting - it doesn't account for the time-of-travel to wells of contaminants. The Dept. of Health uses a default for Group B wells for which there isn't any modeling of the groundwater flow of a minimum of 600 feet. <input type="checkbox"/> They should use an areal approach as well as using the time of travel to a well (5 or 10-year) instead of 100 feet. <input type="checkbox"/> Kittitas County hadn't designated or mapped CARAs, however, they are in the process of updating their CARA ordinance. The proposed updated map is much improved and would be a great asset for the VSP Work Plan. See the Kittitas County Critical Areas Inventory Maps, December 2014, for a link to this map.	Meets		Meets		Meets		overall a good plan.
Fish & Wildlife	Meets		Meets		Meets		Meets		Thank you for proactively integrating DFW's earlier comments from our regional habitat biologist.
Kittitas County VSP Work Group Comments	-	Commission comment - see Section 5.4, page 74 to 75, lines 1180 to 1183 which states: Indicators data are limited and not always collected in an ideal manner for the direct evaluation of VSP benchmarks and program performance. Where data are limited, adaptive management measures described in this section will be applied as part of implementation to address these data shortfalls where possible within program constraints. Ecology comment noted. Future updates to CARA maps can be incorporated in future reporting as an update to baseline conditions.	-	See attached Response Matrix - response to comment 7.	-	See Section 5.3, page 72, lines 1101 to 1102 which states: If new information is collected during monitoring that is not confidential, it will be made available to the appropriate agencies as applicable to assist their monitoring programs.	-	See attached Response Matrix - response to comment 8.	No response necessary