

Franklin VSP Draft Work Plan – Comment Response Matrix

November 2017 DRAFT

Comment matrix updated 10/30/2017

Comment No.	Commenter	Section No.	Page No.	Line Item	Comment	Proposed Response	Further Discussion Needed
1 *	Work Group	ALL	ALL	NA	UNIVERSAL: Include photo captions where appropriate.	Add photo captions throughout document.	N
2 *	Work Group	TOC	TOC	NA	Change spelling of VSP Work Group Alternate to Kathy (with a "K") Criddle	Revise spelling to Kriddle.	N
3 *	Work Group	1	3	NA	Change "What happens if I do not participate in VSP?" to "What are the advantages of participating in VSP?" and add "We encourage all producers to participate" near the end. Also, revise to include advantages of participation.	Revise text and add a line about how participation will help connect producers with helpful resources and maintain a non-regulatory approach to conservation.	N
4 *	Work Group	1	3	NA	For title, revise to "What does it mean to Maintain and Enhance Agricultural Viability"	Revise question title.	N
5 *	Work Group	1	5	NA	Describe ag viability indicators/enhancement, including indicators for ag viability such as: land in production staying or increasing; connections with community colleges; ag census data (farms, new crops, commodities); important businesses support producers; project expansions; VSP viability.	Include expanded description of ag viability indicators. Anchor QEA will revise the text in a separate document and send to Work Group for any additional input. We will discuss further in our May Work Group meeting.	N
6 *	Work Group	1	5	NA	Figure 1-1: Add "/Enhancement" after Critical Areas Protection on left scale. On right scale emphasize maintain "or" enhance. [InDesign]	Revise graphic.	N
7 *	Work Group	1	6	NA	Change to from 28 counties to 27 counties participating.	Revise number of counties.	N
8 *	Work Group	2	8	NA	Photo: Note that the County is building a pumping plant in this location and power plant upstream. 30,000 AF discharge from wasteway. Suggest replacing with Esquatzel shot or photo showing shoreline/ag intersect [InDesign]	Consider replacing photo.	N
9 *	Work Group	2	9	NA	Photo: Replace photo with photo of 395 and to the north. This is not local. [InDesign]	Replace photo.	N
10 *	Work Group	2	11	NA	Major Resource Concern: Remove this text.	Remove text.	N
11 *	Work Group	2	14	NA	Title: Note spelling of "Critical" and space after "guidance" in wetlands box.	Revise text.	N
12 *	Work Group	2	17	NA	Need to revise Esquatzel Coulee section to describe wasteway and include caveat that the coulee/wasteway do not constitute a significant critical area or agricultural activities intersect.	Revise text and send around to Work Group for input.	N
13 *	Work Group	2	17	NA	Add photo caption and change western ground squirrel to "Washington" ground squirrel. [InDesign]	Add caption and revise text.	N
14 *	Work Group	2	18	NA	Replace photo [InDesign]	Replace photo.	N
15 *	Work Group	2	19	NA	Add photo caption "Lenwood Farms pollinator habitat planting"; remove grouse and jackrabbit, add burrowing owl. Also, look into Natural Heritage Program species. [InDesign]	Add caption and revise text.	N
16 *	Work Group	3	20	NA	Note to use RCW language regarding protecting and enhancing critical areas consistently throughout document. Specifically "incentive-based voluntary enhancements." Also, spelling of "Critical" in graphic below should be revised. [InDesign]	Revise mentions of critical areas protection and enhancement throughout document; revise text.	N

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17 *	Work Group	3	21	NA	Add clarification: Federal ground (not in VSP); state ground (varies – DNR/WDFW agreement for lands to be converted to ag/irrigation under DNR land leases).	Add text clarification to section.	N
18 *	Work Group	3	21	NA	Under "Privately owned lands" bullet, revise to "Privately owned and managed lands" and note that CBP land is under easement. Add text that "agencies are responsible for managing land per their own protection/enhancement standards. Include footnote that some privately-owned land is under easement (via CBP for example). Coordinate with Bill Eller to clarify if public land excluded or managed differently. Add photos.	Revise text and add photos. Public land is subject to agency policies and protective measures and are not included in VSP. Similarly, CBP/Irrigation District properties where infrastructure, right-of-way, conveyance for operation of the project is not defined as agricultural land or activity under the Shoreline Management Act and would be considered outside of VSP.	N
19 *	Work Group	3	22	NA	Add photos [InDesign]	Add photos	N
20 *	Work Group	3	29	NA	Add wintering area.	Check updated PHS information and maps and revise accordingly. Note: Wintering area not included in updated PHS data.	N
21 *	Work Group	4	47	NA	Consider conversion to urban. WSDA tracks land that is developed. Also, make 563 in bottom-right box of table a negative number "-563."	WSDA can be used as an indicator for reporting purposes but is not sufficient for measuring goals and benchmarks.	N
22 *	Work Group	4	47	NA	Add text that there can also be refinements in data through time. May not be changes that are actually on the ground.	Revise text.	N
23 *	D. Berkowitz	1	5	NA	I'm concerned about the statement that 'impacts from these events (market conditions and climate factors) on critical areas will be considered adjustments to the baseline condition, or otherwise accounted for in tracking program performance.' And the statement that 'It is also recognized that in lean years, producers may not be able to afford the costs to implement new practices on their land, and VSP goals should account for these varying conditions.' Any possible change in VSP goals or baseline conditions should require extensive conversations with the work group and the Conservation Commission and shouldn't be automatically included in our work plan. As climate changes, protecting critical areas and species diversity becomes ever more important.	Revise text to clarify that any changes to VSP goals or baseline conditions would be coordinated with and approved by the Work Group.	N
24 *	D. Berkowitz	1	7	NA	Table 1-1 Outreach Focus. Should include environmental groups (since you are already doing this).	Revise Table 1-1 to include special interest groups.	N
25 *	D. Berkowitz	2	16	NA	Water quality – 'This function provides clean water for fish and other aquatic species, terrestrial species (including humans) as well as clean water for agricultural practices.	Revise text as suggested.	N
26 *	D. Berkowitz	2	19	NA	Box. Habitats and species in Franklin County. Habitat should include shrub steppe. Species should also include 'uncommon' species (e.g. sagebrush obligate species that are found in Franklin County). Or a note should be made that these are important for protection.	Revise text to include shrub-steppe and a note as suggested.	N
27 *	D. Berkowitz	3	21, 23	NA	What happens with publicly owned lands that are farmed (I think you were going to be looking into this)	See response to comment No. 18.	N
28 *	D. Berkowitz	3	23	NA	Table 3-1 footnote 3. It sounds like these could be intermittent streams or wetlands. These can be important for some species, so how are these areas taken into account in the VSP?	The VSP intersect for habitat areas, such as streams and wetlands, is covered in subsequent sections. This data is used for planning purposes but intermittent streams or wetlands that meet the definition in the hydraulic code are the producer's responsibility to protect or enhance as part of implementation.	N
29 *	D. Berkowitz	3	36	NA	The VSP law is explicit that critical areas are to be protected and enhanced while maintaining and improving the long-term viability of agriculture.	We had a similar comment at the Work Group meeting to address this consistently throughout the document. Revise text as suggested.	N
30 *	D. Berkowitz	3	36	NA	Table 3-2. Does land conversion include/mean urban sprawl?	No. In this case, land conversion for agricultural or conservation practices would help maintain agricultural viability. Good suggestion though and we will revise text to be more clear about that.	N

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31 *	D. Berkowitz	3	37	NA	Table 3-3. 'No surprises regulatory environment.' How does this statement account for regulations that change with time as new information becomes available? For example, if a pesticide is on the market and new tests indicate a health or environmental concern, then a new (potentially 'surprising') regulation may be warranted.	Mike Ritter had a similar comment below, suggesting revisions to text on Page 55 to "Providing regulatory assurances and support to implement voluntary practices." A change in regulations may affect agricultural viability. But it is important that resources are available to help navigate those changes and minimize the element of surprise to the extent practicable.	N
32 *	D. Berkowitz	3	38	NA	'Protecting and enhancing agricultural viability will continue to be a key performance measure that must be met during plan implementation.' Certainly protecting agricultural viability is important, but it's my understanding that there are no formal measurable benchmarks for agricultural viability and that success toward meeting agricultural viability goals doesn't affect a County's eligibility to participate in VSP. Agricultural viability aims and activities are meant to help the County plan for resource lands and to help the local agricultural economy.	That is correct. Defining and formally tracking ag viability is not required by VSP. There are a lot of outside factors that affect ag viability outside of the realm of VSP. The aim of VSP is not to hinder ag viability through implementing voluntary conservation practices. Command and control regulations may have the potential to do this. Suggest rewording: "Maintaining agricultural viability will continue to be a key component of implementation of the Work Plan."	N
33 *	D. Berkowitz	3	38	NA	Fig. 3-7. Other threats – climate change; urban sprawl; loss of pollinators. Also, my understanding is that proposed taxes on carbon didn't include farm products. Climate change is the real threat, not regulations to reduce the extent of climate change.	Agree with other threats and will incorporate. It could still be argued that a carbon tax locally could affect ag viability if it did include fertilizers and pesticides by increasing the price. However, we will edit to be more all-encompassing, perhaps "Increased taxes and regulations on farm supplies".	N
34 *	D. Berkowitz	5	50	NA	What does it mean to 'reduce regulation surprises associated with priority habitats and species decline'? Would these habitats and species be protected voluntarily?	Priority Habitats and species are typically protected as Fish and Wildlife Habitat Conservation Areas. Counties are mandated by state law (the Growth Management Act) to protect habitats that, "if altered, may reduce the likelihood that the species will persist over the long term." VSP will provide those protections using voluntary actions. If VSP is successful in meeting the protection benchmark no further regulation of agricultural activities will be required by the state/County to protect Fish and Wildlife Conservation Areas.	N
35 *	D. Berkowitz	5	50-56	NA	Another conservation practice could include managing to protect pollinators, e.g., managing pesticide and herbicide applications to improve habitat/survival for pollinators/birds/wildlife.	This is covered under Nutrient Management, which we will add to the Fish and Wildlife Habitat Protection and Enhancement tables where appropriate.	N
36 *	D. Berkowitz	5	51	NA	Goal #1 'objective – limit wind erosion of soil.' I was under the impression that wind erosion, while obviously important for farm productivity and air quality, wasn't part of critical areas protection.	Wind erosion areas are not locally recognized Critical Areas, but managing wind erosion would help to protect water quality and wetland functions, which this table is trying to convey. Suggest no change to text here.	N
37 *	D. Berkowitz	5	55	NA	Goal #5 Protection and enhancement. Please include priority and sensitive species.	Agree with suggested edit, will revise text as suggested.	N
38 *	D. Berkowitz	5	57	NA	Measurable Benchmarks. We have previously discussed that we need more than just participation for a benchmark that goals are being met. Performance standards should include both implementation (installation of new activities) and effectiveness (i.e., measured effect of action on critical areas). E.g., monitoring of 10 to 15% of farms each year was suggested. Other possibilities could include mapping and aerial photo evaluation with on-the-ground verification, as needed, of practices in place.	These measurable benchmarks are being updated as discussed at the April Work Group meeting. See line items 55-62.	N

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39 *	D. Berkowitz	5	57	NA	Enhancement Benchmarks. My impression is that enhancement goals and benchmarks must be addressed in the work plan. If enhancement goals and benchmarks are not met, additional voluntary actions must be identified and implemented if funding becomes available. Unlike protection goals and benchmarks, enhancement goals and benchmarks are not the test for plan failure.	These measurable benchmarks are being updated as discussed at the April Work Group meeting. See line items 55-62.	N
40 *	D. Berkowitz	5	59	NA	'Indicators will be reviewed approximately every 5 years to identify if longer term trends are clear.' I think that 'indicator data' would need to be monitored annually so that we know in a timely fashion if the protection goals are being met.	Indicators will be reviewed annually by the CD as discussed at the March Work Group meeting. This is referring to the statutory requirement when monitoring reports are reviewed by the tech panel.	N
41 *	D. Berkowitz	5	62	NA	'Additional indicators will be used as those data become available, but only data on the implementation of conservation practices will be collected and maintained as part of the VSP.' I strongly disagree with this statement. Effectiveness of conservation practices is the measure needed to determine if the VSP is actually protecting critical areas.	The CD will continue monitoring as much as they have the resources to conducting monitoring and validation of conservation practices, and through the support of local and state agencies. The CD will use everything available to them. The indicators, along with field verification that practices are having their intended effect, will help the CD determine the effectiveness of VSP, recognizing limitations.	N
42 *	D. Berkowitz	6	63	NA	'The tracking timeframe for this Work Plan is the first 10 years of implementation.' I thought this was a much longer process and that tracking continues beyond 10 years.	Ten years is the first major milestone for reporting to the director, then it is every 5 years thereafter (see RCW 36.70A.720). Revise text to clarify.	N
43 *	D. Berkowitz	ALL	ALL	NA	Where do conservation groups fit in with monitoring?	CD will determine and incorporate into Work Plan as necessary. If conservation groups are working with private landowners and get permission to report, then they can be used in reporting. Bird surveys and counts, and other data, can be used on a case-by-case basis. It depends on the purpose and the quality of the data and training and resources available to ensure consistency and quality. If a specific need arises and a conservation group may be suited to help, the CD would consider using their services.	N
44 *	M. Ritter	TOC	TOC	NA	Under "Prepared by:" section, change Mike Ritter to Michael Ritter	Revise text.	N
45 *	M. Ritter	3	28	NA	Priority Habitat and Species. 5% will change once additional shrub-steppe and mule deer range are added.	New data requested, will update when available.	N
46 *	M. Ritter	3	28	NA	HCA Functions. Fish habitat, especially for salmonids, is not a big issue in the county. Recommend that this read more toward shrub-steppe: "native shrub-steppe supports sensitive species and provides refuge, nesting and rearing areas for wildlife and plants."	Agree with suggested revision, will revise text.	N
47 *	M. Ritter	3	28	NA	PHS on Ag Lands. Ferruginous hawk habitat will not be most prevalent once mule deer range is included.	New data requested, will update when available.	N
48 *	M. Ritter	3	29	NA	Figure 3-3. The shrub-steppe layer is not complete and mule deer range is basically the entire eastern edge of county along Snake River starting east of Juniper Dunes and all the way up.	New data requested, will update when available.	N
49 *	M. Ritter	3	29	NA	Game species in PHS maps. PHS shrub-steppe and especially mule deer habitat overlaps with a lot of dry land farming in the eastern portion of the county.	New data requested, will update when available.	N
50 *	M. Ritter	4	55	NA	Protection and enhancement. I generally agree with this since it will hopefully concentrate VSP efforts in areas where WDFW and others have previously identified connectivity corridors, habitat concentrations, etc. It gets us away from piecemeal actions, which are still good, but create isolated islands when what we really need to do is multiple long-term efforts in certain areas.	Comment noted.	N
51 *	M. Ritter	4	55	NA	Regulatory surprises is not necessary. Suggest: "providing regulatory assurances and support to implement voluntary practices."	Thanks for the suggestion, we will revise text as requested.	N
52 *	M. Ritter	4	55	NA	Objective (first row). Suggest: "Protect and enhance...techniques that limit adverse impacts to native plants and animals."	Revise text.	N

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53 *	M. Ritter	4	55	NA	Objective (second row). Suggest: Protect and enhance...that promote water management to reduce irrigation water inputs/impacts to native fish and wildlife and their habitats.	Revise text.	N
54 *	M. Ritter	4	56	NA	Objective (first row). Suggest: Restore existing or degraded native habitat. Remove from list: Fish and wildlife structure and hedgerow planting.	Revise text.	N
55 *	General	NA	NA	NA	WDFW and other agencies or groups must continue monitoring efforts and improve methods to help in validating VSP performance.	Add in text caveats where necessary to emphasize this.	N
56 *	Work Group	NA	NA	NA	As discussed in the April Work Group meeting, Franklin County Code critical areas buffers will be used for calculating direct effects to be consistent with the code.	This will be noted in the Work Plan and incorporated into the technical appendix as necessary.	N
57 *	Work Group	NA	NA	NA	As discussed in the April Work Group meeting, use the term "Conservation Practices" consistently; stewardship strategies and other terms are not as commonly used in Franklin County.	Revise text.	N
58 *	Work Group	NA	NA	NA	As discussed in the April Work Group meeting, the goals and measurable benchmarks methodology is being updated and will be revised in Section 5 to reflect these changes. For example, the CD has committed to monitoring a subset of practices using field verification measures.	This will be noted in the Work Plan and incorporated into the technical appendix as necessary.	N
59 *	Work Group	NA	NA	NA	As discussed in the April Work Group meeting, CPPE will be used to relate conservation practices benefits to critical areas functions and values.	This will be noted in the Work Plan and incorporated into the technical appendix as necessary.	N
60 *	Work Group	NA	NA	NA	At the April Work Group meeting, the group discussed which level of enhancement to propose in the Work Plan goals.	Anchor QEA will work with FCD to develop this goal. The decision will be brought to the Work Group for further discussion and approval.	N
61 *	Work Group	NA	NA	NA	As discussed in the April Work Group meeting, CRP is not considered a critical area. CRP is agricultural land, but all agricultural land provides some habitat function and CRP land provides additional enhancement. Therefore, CRP land will count as enhancement and will be adjustable as CRP land goes in and out of production.	Revise text.	N
62 *	Work Group	NA	NA	NA	As discussed in the April Work Group meeting, for producer participation goals FCD recommended using 10% of the number of producers today over the life of the plan. Another option implemented for other counties is more qualitative and includes a goal to increase the level of participation among agricultural producers in implementing stewardship practices.	Anchor QEA will work with FCD to develop this goal. The decision will be brought to the Work Group for further discussion and approval.	N
63 *	Work Group	1	3	NA	Put positive paragraph first "What are the advantages of participating in VSP?"	This text was changed as requested.	N
64 *	Work Group	1	4	NA	Change protect "and/or" enhance consistently throughout the document.	This text was changed throughout the document as requested.	N
65 *	Work Group	1	5	NA	Figure 1-1: Maintain or enhance ag viability	Enhance was added to Figure 1-1	N
66 *	Work Group	2	17	NA	Esquatzel was historically a topographic low that would have flowed during high precipitation events and portions were converted for the purposes of CBP. See SMP language and verify enough detail about historical conditions.	This text was changed as requested.	N
67 *	Work Group	5	68	NA	Water quality: be cognizant of use as a trend versus indicator.	The text in this section was updated.	N
68 *	Work Group	NA	NA	NA	Checklist: This is an opportunity for ag producers to show we are stewards of the land. Replace "failure" textbox	This textbox will be deleted.	N
69 *	Work Group	NA	NA	NA	Checklist: Replace balance scale with updated version	This figure will be replaced.	N
70 *	Work Group	NA	NA	NA	Checklist: Incorporate sustainability	Anchor QEA will work with the CD to determine how to incorporate sustainability into the checklist.	N

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71 *	Work Group	NA	NA	NA	Checklist: Modify sprinkler irrigation to sprinkler efficiency and changes to water management can have effects to associated wetlands	Anchor QEA will work with the CD to determine how to update this text as requested.	N
72 *	Tech Panel (on other Work Plan)	1	NA	NA	The list of work plan participants looks representative of the area, but I didn't see a description of the process that was used to select the Work Group (WSSC); It does not appear in the work plan that there was much outreach for input. Perhaps this just needs to be clarified as to what outreach was done on the plan (ECY)	Add language such as: "The Work Plan was developed through a series of 11 Work Group meetings, beginning on August 25, 2016 through November 2, 2017. Work Group members were recruited through mailed invitation to tribal affiliates, conservation agencies, and past and current participants in County conservation practices. Additionally, the FCD conducted the following outreach activities to form the Work Group: hosted an "Informational VSP kick-off" meeting on August 25, 2016; ran ads in local papers; and posted Work Group invitation announcements on the FCD website. Throughout the Work Plan development process, meeting agenda and materials were available to the public via the FCD VSP webpage (http://www.franklincountyvsp.com/index.php) and also emailed to the VSP interested parties/contact list for all Work Group meetings. FCD also ran a public review period of the draft Work Plan from September 26, 2017 to October 27, 2017 to obtain public input on the plan".	
73 *	Tech Panel (on other Work Plan)	5.2	NA	NA	The Work Plan does not include a distinct baseline for stewardship activities or participation as of July 22, 2011. The TP members discussed whether the Work Plan approach meets the requirement for RCW 36.70A.720(1) (i) for "establishing baseline monitoring". Due to the lack of available data to establish County-wide stewardship participation as of 2011, the Work Plan identifies average historic participation rates and establishes a baseline monitoring approach to overcome estimated discontinuation of practices.	Suggest adding text box with following language: "Establishing Baseline Monitoring per RCW 36.70A.720 (1)(i) This section describes measurable benchmarks for participation in conservation practices. Conservation practices have been implemented since 2011 to improve agricultural productivity, reduce erosion, and improve soil quality from July 22, 2011 baseline.	
74 *	Tech Panel (on other Work Plan)	5.2.2	NA	NA	TABLE 5-7: Consider clarifying how acres in Table 5-7 (Protection and Enhancement Benchmarks) were calculated for 2021 and 2026 performance objectives, and update headings to make clearer what is included in table.	Suggest adding text: "Current performance based on 2011 to 2016 participation data: As indicated in Table 5-7 (last column), total participation acres in key conservation practices since 2011 have overcome the anticipated reduction in acres (or other measure). Protection and/or enhancement performance objectives for 2021 and 2026 (participation acres) have been met based on reported acres in conservation practices from 2011 to 2016. Additionally, the acres that have been reported in conservation practices from 2011 to 2016 have overcome the estimated acres for discontinued practices through 2026. The Work Plan will rely on adaptive management procedures (Section 5.4) to help assess whether protection and/or enhancement of critical area functions are occurring, which will be reported as described in Section 6.3."	

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75	Tech Panel (on other Work Plan)	5.3 and 5.4	NA	NA	<p>Re: RCW 36.70A.720(1)(E)(i) – <i>Create measurable benchmarks that, within ten years after receipt of funding, are designed to result in the protection of critical area function and values</i></p> <p>The current level of participation is the baseline though a number is never given. A key assumption is that participation describes ecological outcomes. I have two concerns:</p> <ol style="list-style-type: none"> 1. There is high uncertainty that participation = ecological outcomes. 2. This approach does not speak to the entirety of critical areas in Grant Co, only those enrolled in a program/ or passively doing conservation (WDFW). <p>Central premise is that measuring participation and implementation of specific BMPs will protect CA functions and values by linking CPPE values to CA functions. The problem is that these only address protections of functions and values for participating producers, which is acknowledged at 10%, county-wide. It does not address CA functions and values on a watershed scale (or community scale as they've chosen to divide the county) or for non-participating producers (WSCC).</p>	<p>Suggest adding a note after the "Habitat Indicators" as follows: Random sample areas will include a representation of lands for VSP participants as well as other lands that may or may not have practices implemented on them, and these results will be extrapolated to the larger watershed analysis unit areas and the County, in an effort to more accurately characterize critical areas protections achieved.</p> <p>Revise Table 5-10 WDFW PHS row as follows: Tracking priority habitats and species data through the WDFW; tracking changes in habitat quality and extent; Evaluating random samples of critical areas (including a representation of lands with conservation practices documented and lands where practices are not documented) using aerial imagery and associated GIS methods</p>	
76	Tech Panel (on other Work Plan)	5.3	NA	NA	<p>Yakima County's Work Plan included "Guiding Principles" for the use of aerial imagery as a monitoring tool, which the Work Group may want to consider including.</p> <p>See additional new language for consideration.</p>	<p>Add "Guiding Principles for Aerial Imagery Interpretation"</p> <p>High resolution change detection or other public available aerial imagery is described as a potential monitoring tool for habitat indicators. This Work Plan includes the following Guiding Principles to ensure imagery interpretation would be reported at a watershed scale, recognize the voluntary nature of the VSP program, and the privacy concerns of volunteers and landowners:</p> <ul style="list-style-type: none"> • Monitoring activities that involve imagery should focus on publicly-available imagery. • Monitoring should be reported at the watershed scale, not the parcel scale. • Imagery evaluation should include a random sampling of areas within the Work Plan's watershed analysis units., <p>It's important to note that changes to baseline conditions outside of VSP are likely to occur due to effects from climate change, natural events (e.g., wild fires), changes in aquifers, and associated surface hydrology from future water supply improvements, or other changes outside of the scope of VSP. Regarding agricultural viability, national and international trends in the market for agricultural products are beyond the control of the Work Plan.</p>	

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77 *	Tech Panel (on other Work Plan)	5.4	63	NA	<p>TEXT BOX: The Work Group may want to consider additional language developed for the Yakima Work Plan describing areas outside of the scope of the VSP Work Plan.</p> <p>See additional new language for consideration.</p>	<p>Revise text as follows: Changes to Baseline Conditions – Areas Outside of VSP Scope It's important to note changes to baseline conditions outside of the scope of VSP are likely to occur due to effects from climate change, natural events (e.g., floods, wild fires), the Columbia Basin Project, or other changes outside of the scope of VSP (e.g., land conversions). Additional changes to baseline may occur in the County that are the result of activities outside of the County, such as effects to watercourses that occur upstream and outside of the County limits, GMA-regulated conversions, changes in eligibility for federal program, changes in federal program funding contract conditions, technical mapping corrections, mapping errors, changes beyond a producer's control, etc.). These changes will not be counted against agriculture for VSP assessment purposes and will be documented through the reporting and adaptive management process.</p>	
78 *	D. Berkowitz	NA	NA	NA	<p>GENERAL: My major concern is the emphasis on participation and CPPEs rather than on evaluating critical area functions and values, what I think are being called 'indicators' in the document. VSP has to meet benchmarks – and the functions and values should be an integral part of the benchmarks, not separated out as 'indicators.' While benchmark and performance objectives should include information on participation and while number of acres protected/enhanced is also important, the goals and benchmarks should be evaluated based on whether a critical area and its function/value is actually protected or enhanced. The way to do this is by observation, based on imagery or on-the-ground truthing. I don't see how using CPPEs accomplishes this; it looks only at those areas that are enrolled in a conservation practice, but not at those other agricultural areas that intersect with critical areas but aren't enrolled in a conservation practice. How are these other areas being protected and prioritized?</p>	<p>The Work Group has determined over the course of many meetings that this is where the Work Plan emphasis should be. This approach maximizes the amount of resources that goes into FCD projects, with an appropriate amount of monitoring a random sample of practices and critical areas using ground-truthing, GIS, and imagery verification (i.e., photographs) at years 5 and 10. Ongoing monitoring will also occur on a project-by-project basis, with results incorporated into VSP monitoring as applicable. This will be in addition to the random sampling selected as part of the 5- and 10-year monitoring efforts. As previously discussed, this is a more cost-effective approach that meets the objectives of VSP.</p>	
79 *	D. Berkowitz	NA	NA	NA	<p>GENERAL: Functions and values (and not just participation) should be part of the 2-yr reports and shouldn't wait for the 5-yr reports. If there are problems developing, we should know about them prior to when we have to implement adaptive management.</p>	<p>See response to Comment 78. The 5- and 10-year monitoring will include projects next to critical areas and critical areas without projects and do a comparison to verify whether there has been a change in functions and values. In addition, the ongoing monitoring conducted on a project-by-project basis will include similar ground-truthing and imagery verification (i.e., photographs) to be included in the VSP reporting. The FCD is confident that this will provide the needed coverage in advance of the 5-year reporting timeframe.</p>	
80 *	D. Berkowitz	NA	NA	NA	<p>GENERAL: Protection Performance Objectives should be looked at as a loss of function compared to what existed in 2011, not as a few additional acres managed. (Table 5-7). It's not just "no net loss of acres managed under conservation practices," but "no net loss of critical functions or critical habitats."</p>	<p>Comment noted. Note that Table 5-7 is only one method of determining whether or not performance objectives are met. Other methods include determining function and values protection or enhancement through conservation practice type and monitoring of a subset of practices by the FCD to ground-truth the data. Overall performance is looked at on a county-wide basis, not by property. In summary, we want to make sure in aggregate the county is protecting and enhancing critical areas.</p>	

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81 *	D. Berkowitz	NA	NA	NA	GENERAL: The document needs more emphasis on habitat and on habitat connectivity. Shrub steppe habitat is barely mentioned. There's so little of it left, that what's there should be a high priority to maintain.	We will emphasize habitat and habitat connectivity throughout the document, with a focus on shrub-steppe, where applicable. Note that previous comments for shrub-steppe habitat were addressed (Comments 26, 45, 46, 48, and 49). See Page 20, Line 513 for a detailed description of shrub-steppe habitat in Franklin County.	
82 *	D. Berkowitz	NA	vii.	NA	Change Valerie Carlson to Debbie Berkowitz; LCBAS alternate is Kathy Criddle; Isn't Mark Nielson Franklin Conservation District?; Shouldn't Heather Wendt be on this list?	We will update Valerie and the LCBAS alternate. The other information is correct and will remain as-is.	
83 *	D. Berkowitz	1	5	267-268	Baseline conditions shouldn't be so readily changeable. For example, market conditions shouldn't have an impact on baseline conditions. Instead, include a statement like – 'Factors that are outside the control of the agricultural community would generally be excluded for VSP monitoring and adaptive management.' It should also be noted that while some factors may be outside the control of the agricultural community, how producers respond to an event may affect a critical area positively or negatively (e.g., grazing after a fire).	The sentence also states: "or otherwise accounted for in tracking program performance." The suggested text will also be added for clarity.	
84 *	D. Berkowitz	1	5	269	Lack of funding could impact enhancement goals, but shouldn't impact protection goals.	Comment noted.	
85 *	D. Berkowitz	1	6	300	Establish protection and enhancement goals and measurable benchmarks <u>that protect the functions and values of critical areas.</u>	Comment noted.	
86 *	D. Berkowitz	1	6	307	Should also include a bullet to <u>provide an adaptive management plan.</u>	Will include additional bullet as suggested.	
87 *	D. Berkowitz	2	14	NA	TABLE: Aren't GHAs also associated with landslides in western part of the county? (part is on ag land or is affected by ag watering)	Comment noted. The Plan has adequately covered the variety of GHA hazards in the county, including landslides. This is covered in the table, the text, and the mapping included in the Work Plan.	
88 *	D. Berkowitz	2	17	NA	Esquatzel Coulee probably provides one of the most important wetland and habitat areas in the County and from the maps, appears to provide the major north-south connectivity. I understand that most of it doesn't intersect with agricultural land, but hope that SCBID will protect the functions and values of this significant critical habitat area.	Comment noted.	
89 *	D. Berkowitz	3	24	601	Language for consideration: When irrigation efficiencies result in wetlands drying up, voluntary enhancement measures could be implemented to help maintain habitat features, although these voluntary enhancements would not be necessary to meet the wetland protection standard.	Will add clarification as suggested.	
90 *	D. Berkowitz	3	27	620	Non-native Russian olives provide important habitat.	Will add clarification as suggested.	
91 *	D. Berkowitz	4	40	814	How does crop rotation protect wetland/floodplain/CARA/GHA/FW HCA? I understand how it protects agriculture and protects soil, but how is this a critical area protection?	See language in text box regarding protection of agricultural viability and improvements to soil health and protect against erosion.	
92 *	D. Berkowitz	4	44	NA	FIGURE 4-2: How many of these impact actual critical areas? I.e., where is the intersect of these activities with critical areas? Benton County VSP was very careful to point out that the goals and benchmarks applied 'in areas of critical area intersect with agricultural activities,' not on all agricultural lands.	All of them are conservation practices that do or have the potential to affect critical areas. This table is not intended to describe the critical areas intersection. Section 5 includes this information. We will add clarifying language.	
93 *	D. Berkowitz	4	47	910	If 'most lands [enrolled in CRP] are not designated as critical areas', then I don't understand the connection between CRP and critical areas. Does this mean that most CRP lands don't provide habitat benefits and only those that do should be included as a critical area? If land was in CRP in 2011 and had habitat benefits, then those should count towards the baseline for protection. Since CRP isn't permanent, maybe it shouldn't count for habitat enhancement.	If the land was in CRP in 2011, it was providing enhancement benefits. Those benefits will continue as long as it is in CRP, or if it is disenrolled and still maintains associated benefits from native vegetation or other habitat improvements.	

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94 *	D. Berkowitz	4	47	925	Part of acreage removed from dryland farming is shown as going to irrigated farming. How does this increase potential water efficiency overall?	That statement was intended to highlight that water efficiency may have been realized through better management of existing water resources.	
95 *	D. Berkowitz	5	53	NA	Shrub steppe habitat and connectivity of habitat aren't explicitly mentioned in this table. Protecting the limited number of acres that are currently managed doesn't look at protecting the rest of the currently existing critical F&W HCAs. There should be priorities for protection of shrub steppe habitat based on areas with at least moderately good functional value and on connectivity and pinch points.	Will incorporate this suggestion into the table where applicable.	
96 *	D. Berkowitz	5	54	1008	Participation goals do not ensure protection of county's critical areas and associated functions and values. A statement is needed that says something like: 'While participation benchmarks are included, the goals and benchmarks are evaluated based on whether a critical area function is protected or enhanced. These functions are determined using imagery interpretation and site visits by technical assistance providers with participating landowners.'	Will incorporate the suggested text.	
97 *	D. Berkowitz	5	54	1015	Enhancement goals may not have to be met for VSP to continue, but additional voluntary actions would need to be identified.	We have a variety of potential practices that can both protect and enhance critical areas identified in throughout Work Plan. Enhancement measures continue to the goals. If somebody wants to protect a critical area with a fence or change land to CRP, these are all enhancement and work toward meeting enhancement goals in the Work Plan.	
98 *	D. Berkowitz	5	54	1017	Benchmark reports should be every 2 yrs. to make sure we're heading in the right direction. Every 5 yrs. would be a test of the work plan and would determine if adaptive management is needed.	We will update the plan to clarify that progress will be reported on a 2-year and performance measurement reported on a 5-year basis.	
99 *	D. Berkowitz	5	55	1029	CPPE is based on participation in practices and an averaged CPPE function effects score, but not on the effectiveness of a practice as actually implemented. CPPE might be used (if at all) as a general idea of whether or not a conservation practice might be useful. But it shouldn't be used to track changes in functions affected by a given conservation practice nor should it be used as a substitute for monitoring what's happening on the ground. The graphs in Appendix C are misleading, making it appear that critical area protection is increasing by large amounts.	Comment noted. CPPE is used as a commonly accepted dataset to provide a function effect score and ground-truthing and monitoring will occur on an ongoing basis to confirm as described in the response to Comment 78.	
100 *	D. Berkowitz	5	55	1046	The baseline condition is not just the (enrolled acres minus the disenrolled acres) x the CPPE score. This doesn't relate to the actual condition of the critical areas in 2011, just to the number of acres that were enrolled in a conservation practice. It doesn't explain what was happening with the acres of critical areas that intersect with agriculture but weren't enrolled in a conservation practice. Those areas are also subject to protection.	Comment noted. Our approach, as we have discussed in the past, is based upon available information in 2011 and FCD will be tracking the changes through conservation practices and monitoring practices as noted in Comment 78.	
101 *	D. Berkowitz	5	56	1064	I don't understand how indirect effects work. If they're not adjacent to critical areas or buffers, how do you know what effect ag is having? This would be hard to measure.	Comment noted. The indirect effect that agriculture is having on critical areas and buffers is difficult to measure and will need to be accounted for during monitoring practices described in Comment 78.	
102 *	D. Berkowitz	5	56	1067	Benchmarks shouldn't be focused solely on participation. Benchmarks should also be addressing the areas and functions of the various types of critical areas.	Comment noted. See response to Comment 78 for clarification.	
103 *	D. Berkowitz	5	60	1116	Indicators should be classified as benchmarks. Indicators per se are not requirements in a work plan, benchmarks are. Indicator (i.e., benchmark) data should be reviewed every 2 yrs to determine the effectiveness of the methods being used to protect/enhance CA functions and values.	Comment noted. Indicators will be reviewed every 2 years to determine the effectiveness of conservation practices used to protect/enhance critical areas and functions and values. See response to Comment 78 for clarification on monitoring activities.	
104 *	D. Berkowitz	5	60	1127	Add – 'unless the contribution of ag activities can be understood.'	Will add the suggested text.	

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105 *	D. Berkowitz	5	62	1206	Goal adjustments – does this mean participation goal objectives?	Participation goal objectives and other goals set as part of implementation.	
106 *	D. Berkowitz	5	66	NA	TABLE 5-9: I do not understand this table. According to Table 3-1, there are 63,951 acres of Fish & Wildlife Habitat Conservation Areas within agricultural lands in Franklin County. According to Table 5-9, the protection metric for habitat management participation is 2 acres and the adaptive management trigger is 3 acres. What's happening with the other 63, 948 acres of functioning F&W HCAs? We should be looking at a reduction (say 5%) in good habitat concentration areas as something that would trigger adaptive management. Similar questions come up for the other types of critical area, e.g., wetland areas.	<p>This response specifically references the habitat question, but it is applicable to all of the conservation practice types in Table 5-9. The 63,951 acres of Fish and Wildlife Habitat Conservation Areas within agricultural lands (Table 3-1) does not tell us how much of this habitat was present for the baseline condition start date of 2011, nor is the amount regularly tracked (i.e. annually, biannually) or tracked in a standard way by regulatory agencies. The VSP is intended to track changes as they are caused by agriculture, and looking at the change in this overall number would require examining if any land use conversions (e.g. from agriculture to residential/commercial/industrial development) were occurring.</p> <p>This approach looks at the amount of conservation practice participation, and assumes a percentage disenrollment rate from these practices (in the case of habitat management, we assumed an annual disenrollment of 7%). Looking at the enrollment in acreage-based habitat conservation practices from 2011, we found that 33 acres of habitat practices per year were enrolled. Applying the 7% disenrollment rate, we had a little over 2 acres per year that were likely disenrolled. The protection metric thus requires at least 2 acres of enrollment per year to cover this disenrollment rate and maintain the baseline amount. If we increased the disenrollment rate to for example 20%, we would need to enroll at least 6.5 acres per year to cover the amount lost. The adaptive management metric at 3 acres (120%) of the protection metric is set to trigger action, as this amount is above our estimated disenrollment rate of 7% and if continued could mean that we fall below the 2011 baseline habitat amounts.</p> <p>Importantly, this approach allows us to easily track the conservation practice enrollment amounts annually through systems already in place and with a goal in mind (enrolment of at least 2 acres of habitat practices). If FCD staff through monitoring and discussions with producers find that the disenrollment rate for a practice is higher than our estimate, we can adjust this calculation and set a new protection, and adaptive management trigger rate.</p>	
107 *	D. Berkowitz	5	67	NA	TABLE 5-10: Aren't a number of these subject to regulatory requirements, so partly out of VSP control?	Correct. That is why they are being provided as indicator data rather than benchmarks.	
108 *	D. Berkowitz	5	67	NA	TABLE 5-10: Every 2 yrs to monitor.	See response to Comment 78 and 98. Revised table to read every 2 and 5 years, or as data is available.	

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109 *	D. Berkowitz	6	72	1352-1375	The 2-yr status reports should also be looking at progress in meeting the 'indicators' described in Section 5 – which is why the indicators should be included in the benchmarks. Five-yr reports would be looking at whether we're meeting goals and benchmarks (including 'indicators').	See response to Comments 78 and 79. Also, revised text in the plan to indicate that indicator data described in Section 5.3 will also be reviewed to progress of Work Plan performance in meeting goals and benchmarks.	
110 *	D. Berkowitz	NA	NA	NA	APP A, FIGURE 4: How are the wetlands in the northwest/north central portion of the county being protected in this document? The document talks about hydrologic functions, but not about specific wetland areas. The wetland areas should be specifically called out as critical areas to be protected for their functions.	We will add a callout in the Work Plan identifying this specific wetland complex as an important area for consideration.	
111 *	D. Berkowitz	NA	NA	NA	APP B-3, P. 3, CARA: within 100 ft of all irrigation district main canals. How do these relate to ag protection of critical areas since they're not controlled by ag?	These areas can be affected by indirect effects, which are described in Section 5.	
112 *	D. Berkowitz	NA	NA	NA	APP C, P. 2: How is wind a consideration in VSP since it's not controlled by ag?; Same for drifted snow – how ag related?; Insufficient water use on non-irrigated land – how ag related?; Habitat – decline of shrub steppe habitat and shrub steppe species isn't mentioned.; Too much emphasis on CPPE – should be used just as a tool to decide what practices might be useful – i.e., as a participation tool, but not as a function and protection tool.; Disenrollment – not recorded, just guessed at. This is one of the reasons why participation isn't a good measurement. Need to have on-the-ground truthing or at least imaging.; P. 5 to 8 – These graphs are misleading. They don't give an indication of how much (for example) habitat area/function or wetland area/function is being protected. The graphs make one think that we've had a huge increase in protection/enhancement since 2011. This seems inconsistent with Table 5-7 and 5-9.	<p>Comment noted. Wind and drifted snow impacts are included due to their role in affecting agricultural resources. Some of the impacts from these features can be minimized through implementation of conservation practices.</p> <p>Shrub-steppe habitat and habitat connectivity are addressed in the Work Plan. Table 1 is more general in nature.</p> <p>See response to Comment 78 and other previous responses for answers to some of these questions/comments relating to disenrollment, ground-truthing, functions and values, etc.</p>	

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113	D. Berkowitz	NA	NA	NA	GENERAL: I am still concerned that there is insufficient monitoring of the different critical areas and also there is no acreage benchmark or acreage threshold for adaptive management. Without this information, I don't see how we can tell if VSP is succeeding or failing at protecting critical areas. The monitoring needs to be done every 2 yrs to catch negative changes in critical areas in time to adjust before adaptive management is required.	<p>To support the VSP every two-year reporting and five year performance review, monitoring of practices and review of indicators information will occur at least every 2 years, with information to support the review and reporting collected annually. The minimum time for adaptive management review as outlined in the work plan is 5 years ("would repeat cyclically at least every 5 years"), however, if a direct monitoring conservation practices indicator is triggered or an indirect monitoring indicators negative trend appears or is triggered prior to the five-year review date, then this will trigger the adaptive management reviews as described for conservation practices (in Table 5-9) and for critical areas indicators (in Table 5-10). We can update text in the work plan that clarifies this intention.</p> <p>You are correct in that a specific % has not been identified for the critical areas indicators thresholds. This is because for surface and groundwater quality, and wetlands and even riparian areas (as discussed in the meeting) there is year to year and seasonal fluctuations and so multiple years of data are needed to verify a trend is occurring, and we are not confident in putting a percentage of change value in at this time. That is something that will have to be determined during implementation, and we expect the CD will coordinate closely with the Workgroup on findings from data review during implementation.</p> <p>For shrub-steppe habitat a value could be established, and we recommend to the Workgroup establishing a 2.5% reduction threshold for shrub-steppe habitat in areas in the county outside of UGAs with a direct agriculture intersection to trigger adaptive management measures, based on your information provided from Yakima County.</p>	
114	D. Berkowitz	NA	NA	NA	It's also hard to tell how much overlap there is in what conservation practices are treating – e.g., pest management and nutrient management can be treating the same critical area, so should be counted as protection of one critical area.	There will be overlap with measures but this will be acknowledged in the reporting and will be counted as protection of one critical area by the applicable one or more practices, and specify the benefits to specific functions and values addressed by the practices, which can be different. CPPE is a useful tool for this application.	

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115 *	D. Berkowitz	NA	NA	NA	I'm also concerned that we don't have goals for participation relative to the total number of acres of each type of critical area in the intersect with agriculture	Establishing goals for participation relative to the total number of acres for each critical area type in intersection with agriculture would be a detailed and time-consuming process and beyond the scope and budget of what we were able to develop for the Franklin VSP work plan. Perhaps some informal goals could emerge as part of implementation, as information is collected on practices and as indirect indicators such as aerial imagery are evaluated and findings are developed over time. Suggest this be something that is further discussed with the Workgroup and evaluated later in implementation (after a few years of collecting and evaluating information), with feedback from the CD on what this would require for resources to complete.	
116 *	D. Berkowitz	NA	NA	NA	I spent some time reading parts of the Yakima County VSP work plan and talking about it and I would like to see many of these ideas incorporated into our document. Examples are provided in the following paragraphs. My understanding is that Yakima County will be doing aerial imaging and interpretation and looking at the data every 2 yrs. "The intent is to interpret imagery and maps in combination with other monitoring tools such as rapid watershed assessment or expert panels to provide as complete a picture of critical area functions and values as possible." Computer programs are set up to do imagery interpretation at very high resolutions. They will look at change data in detail but will report it at the watershed scale. E.g., they will look to track composition, cover, and connectivity in all 660,000 acres of shrub steppe intersect with agriculture in N. Yakima County. In other words, they're not doing random sampling. I'm sure there is some QC checking of the computer output to make sure it's making sense and it would make sense to check this especially in high priority areas. There are lots of good groups who do this kind of work including some at WSU. If remote sensing isn't adequate in some locations to determine if functions and values are doing well, Yakima County would convene an expert panel that may do partial sampling/ground truthing in the field. The National Agriculture Imagery Program (NAIP) has collected aerial data in WA every 2 yrs since 2011 at the 1 meter resolution, so it sounds like data are available. Yakima County collects aerial imagery approximately every 2 yrs.; does Franklin County do the same?	As described in the response to Comments #75 and #76, aerial imagery will be collected and reviewed every 2 years as part of the status reporting (see Section 6.3 of the Work Plan). The NAIP source noted in Yakima County's plan is the same source that is proposed for Franklin County, and what was used to establish the 2011 baseline. This is a national database collected through the NAIP program and is expected to be available every 2 years. We will update the Work Plan to explicitly identify NAIP data as an indicator data source for Fish and Wildlife habitat and include in Table 5-10.	
117 *	D. Berkowitz	NA	NA	NA	The Yakima County work plan provides a numerical value for various critical areas that would trigger adaptive management. For example, if a reduction of shrub steppe habitat exceeds the management threshold of 2.5% at the watershed scale, then adaptive management is necessary. Even if loss is due to fire from a non-agricultural activity and doesn't count against the benchmark, the technical providers still work with affected producers to address options for rangeland operations and shrub-steppe recovery.	We recommend adding a footnote to table 5-10 for Fish and Wildlife Habitat Conservation Areas that a 2.5% reduction threshold for shrub-steppe habitat in the County defines a "significant trend." As described in the response to Comment #81, we will emphasize habitat and habitat connectivity throughout the document, with a focus on shrub-steppe, where applicable.	

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118 *	D. Berkowitz	NA	NA	NA	Yakima will survey all producers and will directly contact 20% of the producers annually that have at least a certain number of acres in the intersect with critical areas. Their goal is to achieve contact with producers in at least 80% of the intersect acreage.	Section 6.2 of the Work Plan describes outreach procedures. In addition to the outreach efforts that have already occurred, during implementation, the CD will contact individual landowners and private industry groups in Years 0-2 to identify conservation practices occurring outside of government programs. Outreach will also continue throughout the duration of implementation. Increased outreach will occur as part of the implementation process if indicators show that agricultural practices are negatively impacting critical areas as described in Section 5.4 and Table 5-10 of the Work Plan. The CD can share with the Workgroup any informal goals they might develop on outreach to landowners as part of implementation, but we do not recommend formal goals be established at this time.	
119 *	D. Berkowitz	NA	NA	NA	Yakima County has also proposed a budget for implementation and monitoring of which 10% goes towards monitoring. I think that's a reasonable number. That leaves 90% for staff resources and cost shares to work with willing landowners. The 10% monitoring would pay for mapping and surveying every 2 yrs as well as reporting and expert panels. Yakima considers aerial imaging and interpretation to be a relatively quick and inexpensive monitoring tool. As I have been saying at our monthly meetings, I want to see our work plan incorporate this kind of information for our critical areas so we can effectively determine if our VSP program is succeeding.	See responses above regarding monitoring and the use of aerial imagery during implementation. We also agree it is a relatively quick and inexpensive tool, but also note that we also have included some ground-truthing as part of this monitoring, which can be more time consuming. Our opinion is that the budget identified for monitoring in the work plan is adequate. As described in the response to Comment #78, this approach maximizes the amount of resources that goes into FCD projects and provides a cost-effective approach that meets the objectives of VSP.	