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Mason County VSP would like to thank the Technical Panel for its thorough review and comments regarding the county's second 5-year report submitted in November 2025. We were delighted to see that the Technical Panel concurred that many of our individual metrics had been met, and that only a small number of benchmarks were not met. We are thankful the reviewing agencies requested more information on the remaining metrics. We understand the challenge in interpreting the measurable reporting of the benchmarks set in 2017 when the Mason County Work Plan was approved. We appreciate the chance to provide some clarity to our report, address uncertainties, and add context for the Technical Panel, Statewide Advisory Committee, and SCC Director.

Overall, the comments' summaries from the four agencies reflect three major themes of uncertainty we'd like to address.

1. Data source validation and clarity and transparency in how results were interpreted.
2. Consensus around the years and locations of benchmark reporting
3. Connection between BMP implementation and Critical Area protection

#### **1. DATA SOURCE TRANSPARENCY, VALIDATION & INTERPRETATION FOR CLARITY**

Comments indicate concern that the reported data were confusing, inconsistent across tables, and insufficiently transparent to determine whether benchmarks were met. Mason County acknowledges that the scale and structure of the Work Plan benchmarks contribute to complex data presentation. The VSP Work Plan was developed as a 10-year, countywide plan that established broad implementation targets using baseline data derived from aggregated county-level datasets (2000–2011). These benchmarks were not written with narrowly defined annual performance metrics, nor were they structured around discrete five-year monitoring and reporting cycles. As a result, translating those broad countywide benchmarks into watershed-scale and five-year reporting formats required layered data analysis and proportional allocation methods.

We recognize that this resulted in tables that were difficult to interpret.

However, using an “apples-to-apples” comparison, using the same baseline sources and applying the same counting methodology used to derive the original baseline, and evaluating implementation at the same countywide scale at which benchmarks were established, the data demonstrate that Mason County met the benchmarks as claimed in the report.

The core issue identified by the Technical Panel reflects ambiguity in the original benchmark language and scale, rather than inconsistency in implementation effort. Mason County agrees that the scale and

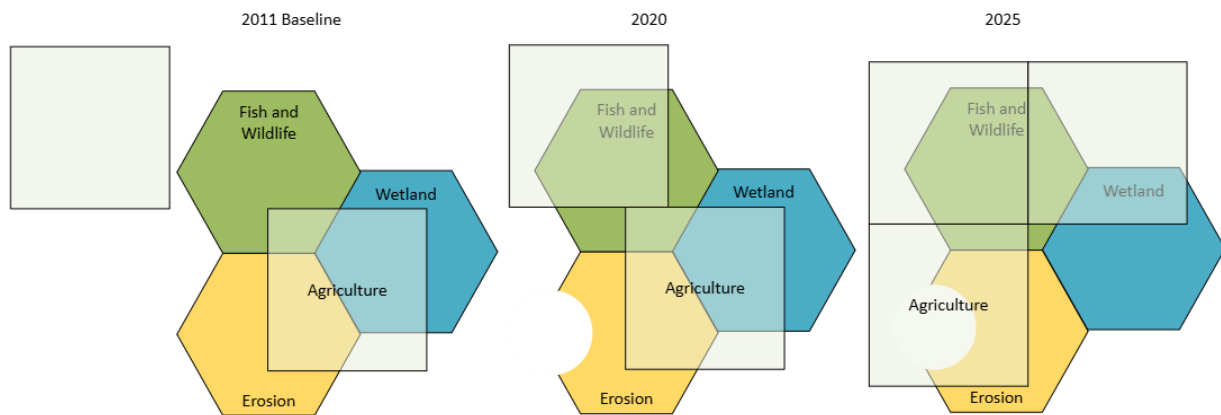
structure of the benchmarks would benefit from refinement under adaptive management to improve clarity, measurability, and alignment between baseline derivation and reporting format.

Mason VSP recognizes the ambiguity of goal and benchmark language that presents challenges to direct and measurable reporting. For example, the protection and enhancement goals for critical areas and agricultural intersects are in direct conflict where protection seeks to maintain the intersect that existed in 2011, and enhancement seeks to reduce that intersect. For interpreting protection, we aligned with the enhancement goals' interpretation seeking a reduction in interface, leaving the interpretation of protection as a "meet or reduce" standard.

However, this entire goal and benchmark approach creates multiple analysis and tracking challenges. For example, it cannot account for the changing of agricultural land use to non-agricultural (or vice versa) use without addressing the previously intersecting critical area as gain, loss, or just *different* from the baseline. Over the timeframes and scales of reporting, this forces reliance on county-wide net summary data interpretations to make inferences and miss out on individual cases.

WSDA commented that they had mapped 28 acres of agricultural land lost to development within the reporting period, but new landowners operating a small farmstead performing VSP agricultural activities and volunteer conservation implementation across the county more than account for these lost acres. If those acres identified by WSDA weren't intersecting critical area, then the Mason VSP workplan as written doesn't account for it. Reporting at this scope and scale leaves out opportunities for these narratives that drive Mason VSP.

Figure 1. Example of Challenges Surrounding Intersection based Benchmarks



This figure shows agricultural activity land (transparent green squares) overlapping with critical areas (colored hexagons, Wetlands, Fish and Wildlife Habitat and Erosion Hazard Areas), and how changes in land use, designation, overlap and loss (represented by white circle) can be difficult to compare over longer timeframes.

Going forward, Mason County supports refining benchmark language to ensure future reports provide clearer and more directly comparable measurable metrics of implementation and impact.

To add further context, we would like to emphasize context around the data that was provided in the report and offer additional context that may have been missed.

- A. The “All AG” acres count used in the report and tables 1 and 3 utilized combined three data sources: WSDA, Mason County Parcel Classification, and Mason Conservation District’s (MCD) Internal Landowner records. These sources identify parcel acres where VSP agriculture activities were being performed. These counts **do not include** aquaculture or turfgrass areas such as golf courses.
- B. Acreage intersect was summarized to account for each critical area in the county wide total; meaning one acre of agriculture that contained wetland, critical aquifer recharge areas, and fish and wildlife habitat accounted for 3 acres of intersect. This was to directly compare with baseline counts using similar methods as the workplan. This way, if acres of a critical area were lost on agricultural land that remained active over the reporting period, they could be accounted for on the reported scale for all associated critical areas. This total was further broken down by WRIA and critical area, but County Totals by critical area have been added at the end of this letter.
- C. Mason VSP believes there may also be some confusion in reference materials and report definitions, including report contents associated with the following terms and acronyms:
1. CARA = Critical Aquifer Recharge Area
  2. EHA = Erosion Hazard Area
  3. FFA = Frequently Flooded Area
  4. FWCHA = Fish and Wildlife Habitat Conservation Area
  5. WSDA = Washington State Department of Agriculture
  6. 303d = EPA 303(d) listed waterway(s)
  7. FEMA = Federal Emergency Management Agency, as in FEMA-designated flood hazard areas
  8. HRCDD = high-resolution change detection, as provided by WDFW
  9. SHA = seismic hazard area
  10. LCH = low canopy height (under 5ft) metric, in acres
  11. EWL = National Wetland Inventory, also commonly referred to as NWI
- D. Area counts were ground-truthed across all source data sets using random sampling methods and field GIS. The results of this work found the 2024 Wetland data to not be consistent with on-the-ground observations, resulting in Mason County VSP claiming more information was needed regarding measurable benchmarks that relied on this dataset.
- a. Random Sampling involved mobile GIS (ArcGIS Field Maps) with each analysis layer and a reporting questionnaire as a point location to determine ground evidence of spatial layers. Parcels along public roads were randomly selected with random number generation in ArcGIS and visited over a two-year period to verify spatial data sets and lack thereof. The tool was also used during site visits to verify spatially identified critical areas.
- E. While countywide totals for goals and benchmarks were reported in the reporting template, some summary values were not included that could help add context for reviewers. These include countywide implementation summary values by county and critical area, and acres intersect summary values. These tables are included at the end of this document.

## **2. CONSENSUS ON BENCHMARK REPORTING**

Several comments from the Technical Panel expressed concerns that Mason County relied on 2016–2025 data rather than strictly 2021–2025 data, and that tables included multiple timeframes.

The Mason County VSP Work Plan is a 10-year work plan with countywide benchmark targets. Benchmarks were not established solely for five-year increments, but rather as long-term implementation and protection objectives.

In preparing the 2021–2025 report, Mason County provided:

- Countywide totals,
- Watershed-level summaries,
- 5-year implementation data (2021–2025), and
- 10-year implementation data (2016–2025).

This was done to maintain consistency with requests and feedback received during the previous five-year review process, where agencies requested expanded watershed-scale reporting and longer-term trend context.

The inclusion of 10-year data was intended to provide trend analysis and adaptive management context, not to replace five-year benchmark evaluation. Mason County VSP recognizes that clearer delineation between five-year compliance evaluation and ten-year trend reporting would have reduced confusion and will improve that separation in future reports.

Mason VSP understands there are issues in how this was synthesized in the report. Maybe a better option would be to show 2016-2020, 2021-2025, and then 2016-2025, with similar rate of change calculations that were originally provided. We made decisions to try to best capture the Work Plan's goals, and the reviewers' needs; however, we can see how this may have led to additional confusion.

In Mason County's final analysis, benchmark attainment was evaluated against the same countywide baseline scale used to establish the original Work Plan targets.

## **3. CONNECTION BETWEEN BMP IMPLEMENTATION AND CRITICAL AREA PROTECTION**

Comments expressed concern that the report did not sufficiently connect BMP implementation to the protection of critical area functions and values.

Mason County respectfully clarifies that the BMPs reported under each critical area category were specifically identified in the Mason County VSP Work Plan as protecting or enhancing those critical areas. In addition, reported implementation occurred only on agricultural lands intersecting the mapped critical areas. Future efforts to distinguish applicable BMPs in five-year reports will also clarify which projects provided direct vs. indirect impacts to targeted critical areas, however this effort may require adaptive management to the language of the workplans goals and benchmarks.

As a result, each reported implementation effort was linked to its associated critical area through two mechanisms:

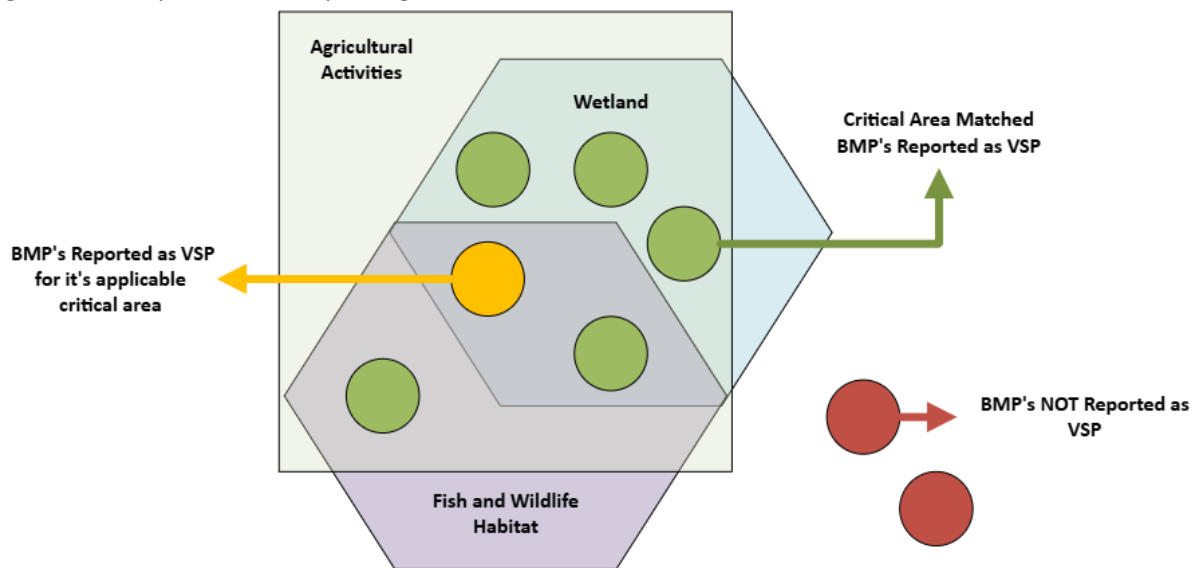
1. BMP categorization within the Work Plan identifying the intended critical area protection function; and
2. Implementation through Individual Stewardship Plans (ISPs), which are developed in coordination with NRCS Farm Plans and applied to the specific land units where those critical areas occur.

For example, BMPs reported under the **Wetlands** category were those identified in the Work Plan as supporting wetland protection or enhancement and were implemented on agricultural lands intersecting mapped wetland areas. The same methodology was applied to **Critical Aquifer Recharge Areas, Frequently Flooded Areas, and Fish and Wildlife Habitat Conservation Areas**, ensuring that implementation was spatially tied to the relevant critical area type.

While the report may not have explicitly restated the ecological function of each BMP in every instance, the relationship between BMP implementation and critical area protection was inherent in the Work Plan framework and the spatial application of implementation activities.

For example, a fence installed to delineate or manage pasture is not inherently a protection or enhancement measure without context. Within the VSP reporting framework, however, such practices were only counted where they occurred on agricultural lands intersecting the relevant critical area and where the practice was identified in the Work Plan as contributing to protection of that area's functions. See figure 2.

Figure 2. Example of BMP Reporting Schema



The Above Figure Shows three kinds of practices. Green: BMP's Identified in Mason VSP Workplan as protecting or enhancing that critical area reported as VSP, Yellow: BMP Identified in Mason VSP Workplan as protecting or enhancing that critical area but not another intersecting area and reported as VSP, and Red: BMP's Implemented in the county over the reporting period that do not intersect with both agriculture and critical area, not reported as VSP.

Mason County agrees that future reporting can more clearly articulate the functional relationship between BMP implementation and critical area processes, such as direct and indirect impact, to improve transparency and readability.

## FINAL REMARKS

Mason County believes that when evaluated using the same scale, baseline derivation, and methodology upon which the benchmarks were originally established, the reported data demonstrate that protection benchmarks were met where claimed. The primary concerns raised appear to relate to clarity of presentation and benchmark structure rather than a lack of implementation effort.

Mason County VSP concurs that adaptive management is appropriate to:

- Refine benchmark language
- Clarify measurable performance metrics
- Improve transparency in reporting scale
- Strengthen explicit narrative linkage between BMP implementation and critical area functions

Mason County VSP remains committed to improving report clarity while continuing to support voluntary, incentive-based agricultural stewardship consistent with VSP statute and the adopted Work Plan.

Mason County acknowledges that the language, scale, and structure of the Work Plan benchmarks could benefit from refinement to improve clarity, measurability, and alignment with reporting practices. We also recognize that our efforts to provide comprehensive transparency in reporting inadvertently resulted in complex data presentation that may have been difficult to interpret.

We remain committed to applying adaptive management to refine benchmark language and reporting approaches, ensuring that future efforts continue to achieve Work Plan goals while improving clarity and transparency for stakeholders.

## County Wide Totals

Table 1. County Summary Acres Interface by Critical Area

|                                    | 2011 Baseline Interface Acres | 2025 Interface Acres | Acres Interface Difference | County Acres 2011 | County Acres 2025 | County Acres Difference |
|------------------------------------|-------------------------------|----------------------|----------------------------|-------------------|-------------------|-------------------------|
| Agriculture                        | 7986                          | 8185                 | 199                        | 663740            | 663740            | 0                       |
| Critical Aquifer Recharge          | 3809                          | 4949                 | 1140                       | 120972            | 120919            | -54                     |
| Erosion Hazard Area                | 123                           | 158                  | 35                         | 16863             | 16856             | -7                      |
| Frequently Flooded                 | 2963                          | 2822                 | -141                       | 61462             | 61795             | 333                     |
| Wetlands                           | 1470                          | 837                  | -633                       | 58341             | 39741             | -18600                  |
| Fish and Wildlife Critical Habitat | 1399                          | 1243                 | -156                       | 27806             | 32821             | 5015                    |

Tables not included in original report to add further context and clarity. These acre counts are county wide summations for their applicable critical area from spatial analysis sources cited in the Workplan and 5-year report. County totals are provided in comparison to agricultural intersects. Note: Wetland spatial data were identified by ground truth to be inconsistent with on-ground observation.

Table 2. County Wide Implementation by Critical Area

| Critical Area | 2011 10yr baseline |       |       |       | 2016-2025 |       |       |       | 2021-2025 |       |        |       |
|---------------|--------------------|-------|-------|-------|-----------|-------|-------|-------|-----------|-------|--------|-------|
|               | Counts             | UNITS | ACRES | FEET  | Counts    | UNITS | ACRES | FEET  | Counts    | UNITS | ACRES  | FEET  |
| CARA          | 86                 | 31    | 312   | 0     | 157       | 57    | 294   | 69753 | 74        | 32    | 228.72 | 51004 |
| FFA           | 62                 | 0     | 107   | 22882 | 96        | 16    | 257   | 77741 | 50        | 10    | 233.9  | 56641 |
| EHA           | 11                 | 50    | 61    | 499   | 200       | 63    | 504   | 89984 | 132       | 44    | 458.9  | 58036 |
| WTLD          | 123                | 8     | 32.5  | 22383 | 261       | 71    | 1010  | 89294 | 186       | 52    | 961.83 | 57346 |
| FWHA          | 15                 | 57    | 28    | 22882 | 240       | 52    | 1284  | 86749 | 179       | 38    | 962.51 | 56181 |

Tables not included in original report to add further context and clarity. These implementation counts are county wide summations for their applicable critical area from implementation cited in the Workplan and 5-year report. NOTE: Some implementation counts overlap between critical area, these counts are not meant to sum from top to bottom, rather to show which practices the VSP Workplan Identified as having protection or enhancement effects on specific critical areas were installed in those associated areas.

Figure 3. Summary tables of Mason County VSP 5-year report assertions.

| Work Plan Goal  | Assertion |
|---|-----------|
| Protect critical area functions and values on agricultural lands at a watershed level as they existed as of July 22, 2011 | Met       |
| Enhance critical area functions and values through voluntary, incentive-based measures                                    | Met       |
| Ensure the viability of agriculture and reduce the conversion of agricultural land into other uses                        | Met       |
| Establish baseline monitoring program to measure benchmarks over a ten year period  | Met       |

| Protect critical area functions and values on agricultural lands at a watershed level as they existed as of July 22, 2011 |               |         |                           |                    |
|---|---------------|---------|---------------------------|--------------------|
| Benchmarks  | Type          | Level   | Critical Area             | Assertion          |
| Maintain BMP Implementation   | Protection    | County  | All                       | Exceeded           |
| Maintain baseline acreage of Agriculture and Critical Area Interface  | Protection    | County  | All                       | Met                |
| Maintain baseline acreage of Agriculture and Critical Area Interface  | Protection    | County  | Critical Aquifer Recharge | Not Met            |
| Maintain baseline acreage of Agriculture and Critical Area Interface  | Protection    | WRIA 14 | Critical Aquifer Recharge | Not Met            |
| Maintain baseline acreage of Agriculture and Critical Area Interface  | Protection    | County  | Wetland                   | More Data Required |
| Maintain baseline acreage of Agriculture and Critical Area Interface  | Protection    | WRIA 14 | Wetland                   | More Data Required |
| Maintain baseline acreage of Agriculture and Critical Area Interface  | Protection    | WRIA 16 | Fish and Wildlife Habitat | Not Met            |
| Maintain 7.5 completed farm plans (Individual Stewardship Plans) per year   | Participation | County  | All                       | Exceeded           |
| Maintain outreach to all operators annually   | Participation | County  | All                       | Met                |
| Return rate of 15 ISP Checklists per year   | Participation | County  | All                       | Exceeded           |

| Enhance critical area functions and values through voluntary, incentive-based measures  |               |            |               |                    |
|---|---------------|------------|---------------|--------------------|
| Benchmarks  | Type          | Level      | Critical Area | Assertion          |
| 5% annual increase of BMP implementation (based on averaged annual implementation over 5 year period of each BMP through the County)  | Enhancement   | County     | All           | Exceeded           |
| Return rate of 23 ISP Checklists per year   | Participation | County     | All           | Met                |
| Increase annual number of completed Farm Plans (Individual Stewardship Plans) to 16   | Participation | County     | All           | Met                |
| Increase annual operator participation levels by 50%  | Participation | County     | All           | More Data Required |
| Reduce agricultural and wetland interface to less than 2011 baseline: (1) maintain and reconfigure agricultural activities away from wetland areas; or (2) restoring and enhancing wetlands in or near agricultural activity utilizing wetland sensitive BMPs | Enhancement   | County     | All           | More Data Required |
| Reduce agricultural and wetland interface to less than 2011 baseline: (1) maintain and reconfigure agricultural activities away from wetland areas; or (2) restoring and enhancing wetlands in or near agricultural activity utilizing wetland sensitive BMPs | Enhancement   | All WRIA's | Wetlands      | Met                |
| Reduce agricultural and erosion hazard area interface to less than 2011 baseline by: (1) maintaining and reconfiguring agricultural activities away from erosion areas; or (2) utilizing BMPs specific to erosion areas.                                      | Enhancement   | County     | EHA           | Met                |
| Reduce agricultural and fish and wildlife conservation area interface to less than 2011 baseline by: (1) maintaining and reconfiguring agricultural activities away from habitat areas; or (2) utilizing BMPs specific to habitat areas                       | Enhancement   | County     | FWHA          | Met                |
| Benchmark: Reduce agricultural and fish and wildlife conservation area interface to less than 2011 baseline by: (1) maintaining and reconfiguring agricultural activities away from habitat areas; or (2) utilizing BMPs specific to habitat areas            | Enhancement   | WRIA 22    | FWHA          | More Data Required |

| Ensure the viability of agriculture and reduce the conversion of agricultural land into other uses |                    |        |               |           |
|--|--------------------|--------|---------------|-----------|
| Benchmarks   | Type               | Level  | Critical Area | Assertion |
| Maintain baseline acreage of Interface   | Agricultural Viabl | County | All           | Met       |
| Maintain baseline acreage of Agricultural Activity   | Agricultural Viabl | County | All           | Met       |
| Maintain 2011 annual average baseline of 7.5 completed Farm Plans                                  | Agricultural Viabl | County | All           | Exceeded  |