

## Appendix 1

Letter to Chairman James Kropf /Members of the Washington State Conservation Commission  
May 31, 2018

Specific concerns regarding SCC's investigation of the Thurston Conservation District include the following:

**1. CONCLUSORY COMMENTARY BY SCC STAFF.** Over the last seven month, SCC staff have made and published a number of conclusory statements about the actions of TCD board members. Instead of describing actions in an objective manner, SCC staff have pasted labels on people and made judgements about their actions. This has served to prejudge the investigation, demonstrate interest, and create a conflict of interest for the Commission.

These statements also seem to be defamatory and aimed at subjecting CD Supervisors to public scorn. This has served to interfere with the work of the TCD Board and make it more difficult for District Supervisors to do their job in governing the Conservation District.

Statements made and published in public documents by SCC staff include but are not limited to:

- "The Thurston Conservation District is currently a dysfunctional entity..." (Shana Joy, Nov. 1, 2017)
- "Disrespectful and inappropriate behavior demonstrated in more than one instance in public meetings by at least two board members" (Shana Joy, Nov. 1, 2017)
- "Demonstrated unwillingness on the part of at least two board members to thoroughly understand and uphold policies and procedures..." (Shana Joy, Nov. 1, 2017)
- Passive aggressive behavior..." (Shana Joy, Nov. 1, 2017)
- "Lengthy, frequent, and inefficient board meetings. (Shana Joy, Nov. 1, 2017)

These statements are characterized as ultimate conclusions and make it appear that the Commission has already arrived at a decision and is now conducting an investigation to develop evidence to support it.

**2. ATTACKS ON DESIGNATED TCD SUPERVISORS.** SCC's published comments and information circulated by TCD staff over the last seven months has helped provoke an angry public reaction that has focused on the two supervisors in question, Mr. Johnson and Mankamyer.

I attended the December 2017 TCD Board meeting and observed well-orchestrated personal attacks made against these two supervisors by members of the public, some of whom directly or indirectly benefited from funding received from TCD. Many of those testifying said the same thing—they demanded that the SCC Executive Director, who was in the audience, immediately remove the two Supervisors from the Board.

The SCC Exec responded by pouring more gas on the fire. He confirmed that he had asked the Commission for and received the power to remove TCD Board members and would be investigating the matter.

Despite these attacks, Messer Johnson and Mankamyer showed extraordinary professionalism and restraint during the meeting, listening respectfully during the abusive testimony and then moving on with TCD business.

Subsequently, SCC did not attempt to deescalate this public reaction but instead continued to offer criticism and publish additional judgments about TCD Board members.

- *“Overall, I still (see) instances of poor behavior occurring. Behavior was one of the issues that I noted in my letter of November 1<sup>st</sup>.....”* (Shana Joy, December 21, 2017)

Ms. Joy does not explain what criteria she used to determine “poor behavior”, how she arrived at that conclusion, or what her authority is to make such a determination on behalf of the Commission. Her statements however do demonstrate an indifference to the effect that they may have on an already-volatile situation -- how they seem to suggest that the outcome of SCC’s investigation is a foregone conclusion and how this appearance may (and did) influence the District’s forthcoming election.

**3. EFFECT ON TCD ELECTION.** One consequence of SCC’s critical commentary was that it served to interfere with our local election for a new TCD Board member and skew the results dramatically.

Beginning in late 2017, the local newspaper began to pick up on SCC’s criticisms of TCD with headlines like *“Thurston Conservation District under investigation as election approaches”* and *“Thurston Conservation District in trouble”* .

The articles quoted SCC’s vague criticisms and conclusory statements which further inflamed public opinion and suggested that district supervisors had neglected their duty or committed malfeasance and would soon be removed from office by the Commission. SCC’s Policy Director, Ron Shultz, added to this expectation in February of this year.

*In November, (the Conservation Commission) sent a letter to the board describing “passive aggressive” and “disrespectful and inappropriate” behavior, including openly complaining about district staff, refusing to listen to fellow board members, and holding lengthy, frequent and inefficient board meetings. It also described a demonstrated unwillingness on the part of at least two board members to understand and uphold district policies and procedures. “These are very serious (issues), and we’re taking them very seriously,” said Ron Shultz, policy director at the Washington State Conservation Commission. State law allows the Washington State Conservation Commission to remove local board members for “neglect of duty or malfeasance in office.” Shultz said he expects staff to make a recommendation on whether to move forward with the removal process by the end of April. (The Olympian, Feb. 27, 2018)*

SCC had the opportunity to deescalate the situation but did not do so. It did not say that the public should not rush to judgment until the facts were known or that District Supervisors, who contribute their time to the community and serve without pay, should be treated with respect.

Instead, SCC’s careless criticisms encouraged the public to vilify their local officials and helped turn the election into a circus, making it for some voters a battle against good and evil.

In 2016, according to the Olympian, only 271 out of 181,000 qualified voters in the conservation district voted in the TCD election. In fact this was actually an unusually high turnout for a CD election. But by the time the 2018 TCD election was over, 2,444 votes had been cast with 279 votes going to a well-qualified candidate who unfortunately was associated with the current board members and 2,148 going to a DOE employee who said he had been recruited as a candidate but had never attended a TCD meeting and didn’t know anything about conservation districts.

SCC should be ashamed of its thoughtless and unprofessional conduct and the effect that it had the election. This is especially so in light of the fact that SCC also serves as the Washington State canvassing board that must certify the very election results that it helped influence. I understand that SCC has now certified the election but did not acknowledging the influence that it exerted to shape the results.

This is one of the many conflicts of interest arising from this matter that SCC faces

**4. SECRETIVE INVESTIGATION –APPEARANCE OF A PRE-DETERMINED OUTCOME.** Since the election, SCC staff have turned this investigation into an open-ended and largely undefined process which is

proceeding with apparently no formal procedural rules, no clear purpose and no disclosure of information in response to public records requests.

**A) A slow moving investigation with a lack of transparency or rules.** SCC, on its website, states that it has received *“several concerns and complaints regarding the conduct of members of the Thurston Conservation District (TCD) board of supervisors.”* SCC has also received requests from the public, including my own information requests, asking for copies of these *“concerns and complaints”* but the Commission has refused to provide this information.

SCC also states that *“At their November 2017 regular meeting, the SCC board of Commissioners passed a motion empowering the SCC executive director to issue a notice of a hearing to each supervisor of the Thurston Conservation District regarding removal of supervisors under [RCW 89.08.200](#)”*.

Instead of conducting that hearing however, the SCC Executive Director has instead decided to undertake a lengthy, open-ended, and slow moving investigation which appears aimed at collecting more *“complaints and concerns”* about the two accused TCD supervisors. This is being done without the due process protections that a hearing would require. When asked for information about this investigation, SCC has again refused to provide it.

Finally, SCC says that *“On February 27, 2018 the SCC shared a memo outlining the status of the implementation of this motion and the status of SCC staff review of other concerns regarding the Thurston CD board.”* The website also stated that the agency anticipated completing this work by April 30, 2018 (now extended to May 31). SCC refuses to say who it shared the memo with and is declining to provide copies of it to the public.

**B) Appearance of a Fishing Expedition.** To confuse matters further, SCC is using its website to solicit additional complaints against the Thurston Conservation District Board members. *“Any individuals wishing to submit concerns about supervisor activity should provide information to SCC staff, including your name and contact information”*. SCC does not require that these complaints be *“made in writing and signed by the complainant under oath”* as required by RCW 42.56.240 (2). Parenthetically, SCC cited this very same statute as authority for turning down my first information request.

Therefore, the situation seems to be this. SCC staff is conducting a secretive investigation into undefined *“concerns and claims”* and is unwilling to say what they are or to provide documents that pertain to them. The process that SCC is using for this investigation is unknown and the agency is also using State resources to expand its investigation by making an open-ended invitation to the public to send it additional complaints and concerns. Apparently SSC is not requiring that these complaints be in writing or under oath.

Given these things, SCC’s investigation seems to be little more than a *“fishing expedition”* looking for evidence to support conclusions that Commission staff have already made.

**C) Selectively gathering evidence.** While SCC is collecting evidence and seeking testimony, it seems to be picky about what it will accept and who it will talk to.

According to its website, SCC is asking the public only for *“concerns about supervisor activity”*. It does not ask for exculpatory information as well and does not seem to want it. Nor does SCC indicate that it is willing to look at other pertinent issues, including TCD staff conduct. The narrow focus of SCC’s investigation seems likely to prevent it from collecting evidence that will offer a comprehensive understanding of the situation and serve as a reliable basis for any hearing that may subsequently occur.

SCC is also apparently being selective about who it gathers evidence from and is not contacting all “individuals wishing to (provide information) to SCC staff” who have stepped forward. On April 26, I wrote to the SCC Executive Director to say that I would like to be contacted and to ask for information about the investigation. While the SCC did write back to deny my information request, SCC staff had not scheduled an interview nor does it seem interested in what I might have to say.

**D) Refusal to provide public information.** Members of the public have contacted SCC asking for information about the investigation and how it is conducting it but the Commission has consistently turned down information requests. SCC staff have cited several sections of the RCW’s in attempt to justify this, curiously including the Washington Savings Bank Act, but nothing appears to justify its refusals. I have asked SCC to provide me with a copy of the legal opinion, perhaps an AGO, that it was relying on but have not received a response.

**E) Investigating TCD supervisors but not TCD staff.** SCC is focusing its investigation on TCD Supervisors but apparently is not also looking at the conduct of SCC staff. SCC also is not acknowledging that TCD Board members have raised questions about how staff has been handling District finances and keeping District records.

The narrow focus of this investigation therefore seems to be ignoring relevant information that is necessary for a comprehensive understanding of the situation and an objective determination of the facts upon which any subsequent hearing must rely.

In fact the controversies that prompted this investigation, at least in so far as SCC has explain them, seem to be a reaction to the TCD Board doing its job and asking its staff to be accountable to the public. The Board has raised questions about staff conduct related to financial matters, conflicts of interest, and use of District property. It has also raised questions about District staff’s activities regarding TCD’s unsuccessful attempt last year to change its local funding to a ‘rates & charges’ assessment.

Supervisors Johnson and Mankamyler, who serve as the TCD Board Chair and Auditor respectively, have taken the lead in this.

There is the additional question of whether District staff played any part in shaping public opinion about these controversies and encouraging the public attacks that took place on Board members ostensibly as a way to divert attention from other issues.

For example, TCD Board member Samantha Fleishner apparently sent a letter dated Nov. 29, 2017 to SCC demanding ‘*...the immediate removal of Thurston County Board Supervisors Erik Johnson and Richard Mankamyler. Due to issues of ongoing harassment and discrimination of board and staff, neglect of duties, unethical conduct, spread of malicious misinformation and general lack of good governance procedures detailed below, it is imperative to the survival of Thurston Conservation District that the Washington State Conservation Commission Executive Committee removes the Board Supervisors mentioned above immediately.*’

Ms. Fleishner’s statements about her colleagues on the Board are extraordinary but even more extraordinary is the metadata on this letter that apparently shows that the “author” was “accounting”, that the document was created on “11/29/17 4:33 pm”, and that the “company” that owned the computer upon which the letter was written was the “Thurston Conservation District”.

This creates the impression that the letter was actually written by district staff in TCD’s Accounting Department on company time using the District’s equipment. If this is so, Ms. Fleishner’s letter raises a number of questions that I believe SCC must look into as part of its investigation.

One involves questions of potential misuse of public resources and attempted manipulation of a public agency's governing board by its staff. Another is whether Ms. Fleischner, a former intern with TCD, was acting as a proxy for staff attacks on two board members who are attempting to investigate questions that have arisen regarding staff conduct.

The TCD Board Auditor, Mr. Mankamyer apparently brought these concerns to the SCC Executive Director several months ago and provided him with a copy of the metadata, asking him to investigate the matter.

**5. Feedback for the SCC's Investigation.** There are a couple of important points that should be part of SCC's investigation and acknowledged in whatever findings it may make.

One is that TCD has had a history poor management, inadequate record-keeping, and questionable financial transactions. This history and questions about current practices are what I understand that Messer, Johnson and Mankamyer and the TCD Board have been attempting to look into.

Another is SCC's own responsibility for maintaining a statewide conservation district system that is designed to 'fly below the public's radar'; a system that encourages opacity in governance, that prevents voters from voting in local elections, and that promotes friction between Supervisors and their staff.

This last point is important in understanding some of the circumstances that appear to underlie SCC's investigation. As discussed below, TCD has confused the relationship between its Board and staff which over the last 20 years has encouraged misunderstandings and friction between the two. SCC has been complicit in this by acquiescing to the situation and failing to work with TCD to correct it. SCC is now criticizing the predictable outcomes (i.e. friction and frustration between the Board and staff) and personalizing the conflict (by blaming Board members), but is ignoring the cause of the problems and its role in helping create it.

**A. TCD has a history of troubled management.** TCD was severely criticized by the press and public circa 1999-2000 when a State Auditor's report (Report No. 61253) turned up evidence of questionable financial practices, self-dealing, and inadequate record-keeping. The Olympian's first editorial salvo declared that TCD had "*shown reckless disregard towards the taxpayers of Thurston County*" and that "*the elected and appointed supervisors—Jackie Reid, Harry Peterson, Doug Rushton, Peter Moulton, and Fred Colvin—have lost our trust and respect.*" The paper demanded that these supervisors resign.

Interestingly after a year of withering publicity, SCC apparently decided to maintain the status quo rather than removing supervisors as it is now threatening to do. It allowed several of these people named (Colvin and Reid) to continue serving on its board and for the last 19 years it has continued to reappoint one of the other individuals (Doug Rushton) to the TCD Board.

The full text of this editorial and a number of other news articles are attached as Appendix 2.

**B. Conflict between the TCD Board and Staff seems to have been institutionalized in 1999 with SCC's acquiescence.** In response to this negative press, the TCD Board decided that the best thing it could do to protect the public interest was to-- give away most of its corporate powers and transfer them to District staff!

In general, corporate boards can delegate administrative responsibilities to staff but not their corporate powers. Nor can these Boards delegate their corporate responsibilities of "scope and due diligence". The members of a governing board remain responsible to those who elected them – in the private sector, to their stockholders and in the public sector, to the voters and taxpayers in their jurisdiction.

Nevertheless, on June 9, 2000 pursuant to Resolution 00-0601, the TCD Board added a couple new sections to the TCD Policy & Procedure Manual (see pp. 4-9) and gave its District Administrator the bulk of its *“ministerial or executive, legislative or judicial,”* power, providing that the *“District Administrator shall be given great deference when exercising the authority delegated by the Board of Supervisors”*.

The TCD Board continued on, giving the District Administrator specific powers which included setting staffing and salary levels, hiring and firing employees, consultants and attorneys, and appointing employees to management positions.

It also provided that the District Administrator could *“promulgate District policy with regard to financial matters, to “review, approve, disapprove, or prohibit any financial transaction, contract, or any action taken by any District employee involving District funds in any way”* and *“shall have the authority to adopt District procedure with regard to financial matters without the consent of the Board of Supervisors”*. (emphasis added)

And then, apparently to doubly absolve itself of corporate responsibility and expiate public criticism of its actions, the TCD Board made a second, nearly identical delegation of authority to the District Treasurer thereby confusing the chain of command at the administrative level and further complicating the Board’s working relationship with its staff.

The Board’s move was obviously in response to a year’s worth of bad press about its management of the District but its efforts to deflect criticism by dumping much of TCD’s corporate management responsibility on administrative staff seems to have had long term negative consequences.

The dual delegation to the District Administrator and Treasurer respectively has created confusion in the District’s management structure. More importantly, the Board’s attempt to transfer most of its governance powers seems to have convinced District staff that they had the right to run the Conservation District as they please and that the Board is now largely impotent and irrelevant.

As staff assumed more authority, TCD seems to have been increasingly administered informally and by fiat rather than by formal action by the Board. The District was happy to publicize its conservation activities but its governance practices were largely unknown by the public. As a consequence, TCD increasingly operated “below the public’s radar”. Its governance was opaque and its system of choosing new Supervisors relied on an SCC-designed elections system that was largely controlled by District staff and attracted very few voters. Without transparency and public oversight, the District seemed likely to sooner or later be facing new questions about its financial management and records-keeping procedures, and in fact, by the end of 2017 that is just what happened.

The point of this narrative however is that SCC should have stepped up in 2000 or at any time over the next 18 years to tell the TCD Board that its delegations of governing authority to District staff were inadvisable and probably illegal. SCC should have intervened to insist that District governance be returned to the Board, that the relationship between the Board and staff be clarified, and that that District administration be transparent and open to the public.

Unfortunately, SCC didn’t do this.

SCC also ignored specific concerns about the situation when it was brought to the Commission’s attention. When I was appointed to the TCD Board in the fall of 2014, I made it a point to read the District’s Policy & Procedure Manual and was flabbergasted to find this language in it. I asked SCC staff why the Commission allowed the District to adopt such a resolution but received a disinterested response.

I then brought my concerns to the TCD Board and the majority of Board took steps, over staff's objections, to reclaim its governing authority by adding clarifying language to the District's Policies & Procedures.

However, when I left the Board in the middle of 2015, the new Board majority (Rushton, Fleischner and Hall) apparently returned corporate power to the staff. The reasons for this are unclear but seem likely to have been prompted by a desire to placate District staff, a disregard or misunderstanding of corporate management principles, and a belief that this somehow protected the TCD board from public scrutiny and criticism.

This back-and-forth delegation of power between the Board and staff has set the stage for the conflicts which have now apparently lead to SCC's investigation. In 2017, a new Board majority apparently began to once again move corporate governance authority back to the TCD Board, and again faced resistance from the staff. At that point, the situation seems to have turned into a competition between staff and the Board majority over who was running the District, with the Board minority running interference for staff. Impressions are that this was the genesis of Ms. Fleischner's letter (apparently drafted by TCD staff) to SCC that seems to have set the Commission's current investigation in motion.

This history and SCC's role in it is relevant to the Commission's investigation. SCC failed in its responsibilities to advise TCD of the difficulties that would predictably arise from its delegations of power in 2000. It failed to work with Supervisors who raised concerns in 2014 about the confusion and friction that was occurring and it was apathetic when Board members complained of staff hostility and resistance.

In short, the Washington State Conservation Commission has been complicit in creating the situation that it is now investigating. This is the point where the investigation should begin and the reason why SCC must turn it over to an agency that is not compromised by conflicts of interest.

**C. Flawed Election System.** SCC also promotes friction between a conservation district's Board of Supervisors and staff through its flawed election system. The system, designed and maintained by SCC, allows District staff to administer local elections without many of the safeguards that protect both candidates and voters in other elections taking place in Washington State. Because of this, the potential for election fraud and manipulation is significant and the lack of oversight may result in District staff attempting to influence election outcomes.

Add to this the situation described above where 20 years ago the TCD Board transferred most of its corporate powers to its staff. The question that may be reasonably asked by the public is if the staff so empowered might not consider tweeking an election here and there that it is administering to elect a Supervisor who may be more deferential to staff control of the District with no questions asked. These are questions and concerns, not statements or accusations, but the situation raises both substantive and appearance of fairness issues that should be looked into.

Like its conservation district governance system, SCC has designed the district election system to also 'fly below the public's radar'. The elections are usually controlled by CD staff rather than the county auditor and take place without the knowledge of most of the voting public. Elections rules are not uniform around the State and may vary widely from district to district. The few voters who are aware of the election must ask for ballots and then must figure out how to vote them. As a result, the elections typically receive only tens of ballots when there are several hundred thousand voters in the District and in at least one instance, no one voted at all.

If a county auditor conducted an election like this, s/he would likely be challenged in court and removed from office. Certainly the Secretary of State would intervene and refuse to certify the election results. However this is business as usual for CD elections conducted pursuant to a system designed and run by SCC.

This system has little meaningful oversight or few safeguards at the state level and locally CD staff who traditionally run the elections may have no experience in election administration.

SCC serves as the state canvassing board but provides little meaningful oversight. It has been willing to certify elections results despite questions raised about glaring irregularities and apparent fraud. In some cases, District Boards have written to SCC to raise concerns about how their election were conducted and ask that it be rerun.

SCC has traditionally defended criticism of its election system in the past by claiming that its CD's cannot afford real elections. In saying this, SCC chooses to ignore the enormous cost and harm that its election system inflicts on voters, tax payers, and candidates and the potential legal costs that are likely to accrue to the State when its election system is eventually challenged and overturned in court.

In addition, local CD's don't seem to be lacking funds but instead prefer to use their money for things other than fair elections, such as, in some cases, to inflate staff salaries. An example of this can be seen in the Thurston Conservation District's efforts last year to first increase taxes by adopting a Rates & Charges assessment without adequate public notice and then use the additional funding to nearly double staff salaries, raising its part-time accountant's pay to approximately \$140,000 and substantially boosting other salaries as well.

Fortunately TCD's plan failed, in part due to the ineptitude of TCD staff and in part to concerns raised by the Thurston County Prosecutor, the Thurston County Commissioners and several Thurston CD Supervisors. However, rather than supporting these Supervisors and thanking them for their diligence on behalf of the public, SCC is now investigating them and threatening to remove them from office -- apparently in response to complaints made by Thurston CD staff and the network of contractors that the CD helps fund.

**D. Big Money and the Rise of Environmental Contractors.** One thing that has changed in the world of conservation districts is the amount of money that now flows to or through them. This has put additional pressure on CD governance structures and election systems that have not changed much since the 1930's.

Conservation Districts were created in the Dust Bowl era of the 1930's as part of President Roosevelt's attempt to help farmers by encouraging conservation and improving agriculture. Soil erosion was a primary concern at the time and the original Districts were informal affairs with few powers, limited goals, and virtually no funding. They were run by local farmers who served as CD supervisors without pay and usually without the assistance of staff.

However by the 1980's, CD's were growing large in money and responsibilities as new environmental laws were enacted and state and federal funding for conservation programs became available. The rise of environmentalism also served to shift the Districts' focus away from farming and towards environmental protection as the two were increasingly seen as separate and sometimes competing interests. The notion that agriculture and natural resource conservation went hand in hand was fading as a separate class of environmentalists arose to challenge farmers for the title of 'good stewards of the land'.



CD's used the new money to hire or expand administrative staff to manage the District's growing budgets and attend to its increasingly complex duties. These staffers were "professionals", trained in environmental sciences and guided by the growing body of environmental regulations that were being enacted, but they were unlikely to have much experience in running a public agency or administering an election. They also didn't necessarily know much about farming. As paid professional staffers took over the administration of the District, the involvement of the part-time, unpaid governing Board of Supervisors began to recede.

Contractors also emerged and multiplied like rabbits. These NGO's purport to have specialized knowledge and offer their "professional" services to CD's to help them execute their duties under the growing number of environmental programs that were being created. In return, the CD's paid for these services with pass-through funding from state and federal programs. These contractors tended to work more closely with the CD staffs than with the volunteer Boards of Supervisors which served to further marginalize and complicate traditional CD governance.

So today, a Conservation District involves at least three principal entities at the local level (Supervisors, staff, and contractors) and a strong emphasis on environmental protection when the CD's of the 1930's involved only one entity (the Supervisors) who worked with resource conservation as a means to help local farming.

These contractors have become organized and now serve as a non-agricultural constituency that was never envisioned by FDR's New Deal that created CD's in the 1930's. Their interests are largely programmatic and they have now become a lobbying group that can and does put pressure on the CD's board of supervisors.

A working relationship has also developed between the contractors and CD staff as the District support the contractors' operations with pass-through funds. In some cases, CD staff have served on contractor's boards or had spouses/relatives serving as District contractors. This has raised ethical question about conflicts of interests.

Further, questions have been raised as to whether their close relationship with contractors may encourage CD staff to use them as proxy's to manipulate their board of supervisors or perhaps do such things as generate letters to SCC asking it to remove supervisors that staff dislikes.

Since SCC's has designed the Conservation District system to 'fly under the public's radar', these concerns and questions receive little public scrutiny.

**E. Supporting Volunteer District Supervisors.** It appears that in many cases SCC has closer relations with CD staff than with its Board of Supervisors and is more likely to support their cause when problems arise. This may be because SCC and CD staff have similar backgrounds, are paid, full-time employees, and regularly work together. Supervisors on the other hand are part-time volunteers with limited time and resources.

Nevertheless, SCC must understand that a CD's Board of Supervisors is the corporate entity that is responsible for running the District. It is the governing body of a local public agency and must be treated as such.

Another point that SCC must appreciate is that Washington State's conservation district network relies heavily on volunteerism. While Districts are paying out hundreds of thousands of dollars to CD staff and contractors, the Supervisors are local volunteers who take time away from their businesses and families to support the conservation district system.

SCC's unprofessional actions and statements in the current investigation disserve and disrespect the CD supervisory system and chill public participation in it. SCC's vaguely constituted and open-ended investigation and the other issues described above should give pause to anyone who might consider serving as a CD Supervisor. When SCC fails to put a CD's Board of Supervisors first and offer them its support, it threatens the governance of the entire conservation district system in Washington State.

I am sending this letter to members of the Washington State Conservation Commission after unsuccessfully attempting to work with Commission staff. I hope that the Commission will consider the points raised and if decides to continue this investigation, that is will take advantage of the provisions of RCW 89.08.060 and transfer the matter to another agency with the resources and experience to produce results that the public may have confidence in.

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