



August 18, 2026

Delivered via electronic mail to: mshumake@wwcowa.gov

Melissa Shumake, Director
Walla Walla County Community Development
310 W. Poplar Street, Suite 200
Walla Walla, WA 99362

*Re: SCC Executive Director Determination of the Status of Walla Walla County in the
Voluntary Stewardship Program following the Second 5-Year Report*

Dear Melissa:

This letter documents my decision to concur with the assertion of your county's Voluntary Stewardship Program (VSP) work group that it is meeting its county VSP work plan goals and benchmarks following its second 5-year report, submitted March 4, 2026.

Background

The VSP requires each county watershed work group to report to the Executive Director of the Conservation Commission and the county on whether it has met the work plan's protection and enhancement goals and benchmarks.

Reports are to be submitted at five-year intervals from the date of receipt of funding and sent to the Director of the Commission and to each county legislative authority by the local work group. The Director must decide to concur, or not, with each county work group's assertions about its standing in the program. A county's status is contingent on meeting the work plan's protection goals and benchmarks.

Your county work group has asserted that the work plan's goals and benchmarks have been met.

Five-Year Report Review

My decision to concur comes after reviewing the final report and the Comments issued by the VSP Technical Panel, consideration of the Walla Walla County Response to the Technical Panel Comments, consultation with the VSP Statewide Advisory Committee, and procedural briefings provided by my staff. The Technical Panel Comments accompany this letter, along with the County Response that was provided by your county work group upon receipt of those comments.

Technical Panel members' overall reviews and evaluations of the report, answering the question of whether the agency determined that the county had met its protection goals and benchmarks, were as follows:

Department of Ecology:	Mostly Met
Department of Agriculture:	Met
Department of Fish and Wildlife:	Met
Conservation Commission:	Mostly Met

Some of the reasons for my decision and potential areas for voluntary adaptive management include:

- Walla Walla County continues to be one of the state's top VSP practitioners when it comes to incorporating voluntary adaptive management processes and effectively identifying and implementing impactful conservation tools to support critical areas, especially FWHCAs and CARAs.
 - The diligent efforts to monitor and replace fish screens, restore riparian habitat, remove fish passage barriers, and restore stream function are evident in the county's tracking and reporting data. Tens of thousands of acres of irrigation efficiency and nutrient and pest management projects are having positive impacts on groundwater resources. The Walla Walla County Conservation District has a well-developed approach to implementing monitoring protocols and adapting their approaches when new data is available. The Walla Walla County VSP team should continue expanding and refining its Monitoring Plan to complement its ongoing adaptive management actions.
- There are three areas where the local program can strengthen its approaches to critical area protection and monitoring.
 - Work to develop more targets for protection and/or enhancement for wetlands and for frequently flooded areas, as appropriate.
 - Pursue more intercounty collaborations for monitoring upland shrubsteppe habitat.
 - Provide more information on BMPs that have been implemented and subsequently impacted critical areas going back to the program's baseline year of 2011.
- Walla Walla County should continue to adjust and update its work plan goals and benchmarks with new metrics and/or targets for multiple upcoming five-year reporting cycles. Any updates should consider how changes to available funding streams may interrupt or interfere with achieving new targets and balance those considerations with the need for continuing to protect and enhance critical area functions and values.
 - Implementation benchmarks should not serve as the basis to protect critical area functions and values and then be used to also qualify for enhancement benchmarks. Enhancement means that critical area functions and values are showing data-driven improvements, but implementation tracking does not typically address the actual conditions of critical areas.
- Thresholds for critical areas protection, including those for voluntary adaptive management triggers, should be re-evaluated and considered for removal from the work plan as part of a voluntary adaptive management process. Allowing certain levels of critical area losses before corrective actions are necessary is not how the program [defines protection in statute](#). The county should consider working with the Technical Panel to address this component of the current work plan.
 - Related to the topic of thresholds for action, implementation benchmarks should not serve as the basis to protect critical area functions and values and then be used to also qualify for enhancement benchmarks. Protection by way of BMP implementation and tracking does not address the actual conditions of critical areas. Historical BMP implementation rates may help set targets to maintain as

part of protection goals and benchmarks, however, without accompanying monitoring data, implementation tracking alone does not provide adequate evidence that protection targets are being met. Likewise, enhancement means that critical area functions and values are showing data-driven improvements.

Next Steps

The Commission urges the county work group to review this feedback and the comments from the Technical Panel, and to work with state agency staff either at the local work group level or with the Technical Panel when going through the voluntary adaptive management process. I expect the items highlighted by the Technical Panel to be addressed in some capacity during the next five-year reporting cycle.

Please continue to implement VSP in your county with the above comments in mind. VSP counties are strongly encouraged to employ a continuous improvement process for maintaining and updating their work plans, and when necessary, make voluntary adaptive management decisions to improve implementation of their VSP plans.

Thank you for your participation in the Voluntary Stewardship Program and for coordinating best management practices with landowners to protect critical areas in your county's watersheds.

Sincerely,



James Thompson
Executive Director
Washington State Conservation Commission

cc: Annie Byerley, District Manager, Walla Walla County Conservation District
Nells Hannah, VSP Coordinator, Walla Walla County Conservation District

Attachments: VSP Technical Panel Comments
Walla Walla County Response to Technical Panel Comments