

Lewis Conservation District VSP Workgroup (Brian Thompson)

Please see attached letter.



2057 SW Salsbury Ave. – Chehalis, WA 98532-8710 – Phone (360) 996-4560

B. Thompson	Chairman	S. Ernst	Member
R. Averill	Vice-Chairman	D. Taylor	Member
T. Spencer	Member	L. Tevis	Member
C. Aldrich	Member	M. Mallonee	Member
B. Merryman	Member	R. Ellis	Member
K. Harma	Member		

Dear Ecology,

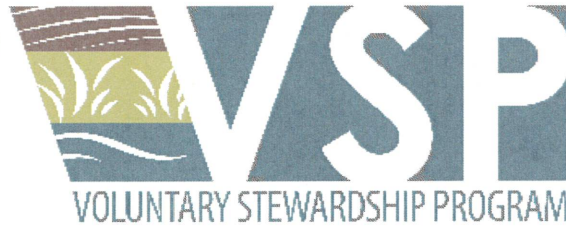
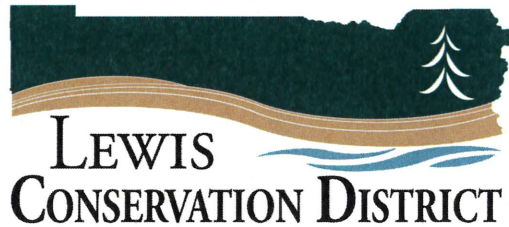
Oct 22, 2025

Lewis County's Voluntary

Stewardship Program Board has some concerns with the Voluntary Clean Water Guidance for Agriculture currently out for public comment. We feel that the language, although listed as “voluntary” still conveys the threat of mandatory or enforceable actions on agricultural land. We are also concerned that the listed buffer widths required to receive financial support for conservation projects are too large to be acceptable by farmers.

Farmers are under great economic pressure to make farming viable, but in spite of this, most of them are still putting in the work to protect critical areas. The Lewis Conservation District (District) has written over 600 Individual Stewardship Plans with farmers that document conservation practices completed and recommend additional ones. Our farmers have done an exceptional job implementing riparian buffers through District programs or on their own. We have given away several thousand trees provided by the Carbon Capture Foundation for farmers to plant in critical areas. Most farmers can't afford to do many of the additional practices recommended by the guidelines as they would like to because of the cost. For example, for them to construct a much-needed manure storage building with cost share provided by Ecology using the proposed guidelines, they would be required to add plants and even fencing to a 250 foot buffer on their stream. That cost would make the program unavailable to them. The District has rarely been able to partner with Ecology because of these onerous requirements.

The Board concedes that there are still some farmers causing environmental damage that may need to have enforcement actions. The District has been able to work with a portion of these farmers to bring them into compliance. If they have to comply with the full Ecology Voluntary Clean Water Guidance for Agriculture manual, as proposed, most farms would no longer be able to function. This would be an unconstitutional taking of land. Lewis County is already listed as a food desert and cannot afford to lose any more productive agricultural land to other land uses. Properties in our county are already under pressure for subdivision and conversion to non-agricultural uses, and as farming becomes less viable, farmers have no choice but to sell or subdivide.



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We encourage Ecology to better recognize and support local VSP programs in their updated guideline document. In Lewis County, we have been successful implementing voluntary practices and need both financial support and regulatory assurances to continue to do so. Staff from the District regularly visit farms to tell them about the Voluntary Stewardship Program. Despite being a non-regulatory group, one of the main concerns we hear is that they don't want to talk to us because they will be forced to plant unreasonable stream buffers. The technicians try to explain that our programs are voluntary, but because they know that there is the potential of enforcement from the State, they are leery. We encourage you to consider updating the guidelines to allow for flexible buffers. Landowners would be more likely to be interested in working with us on cost share projects, to develop Individual Stewardship Plans, and engage in other District programs. Thank you for listening to our concerns.

Sincerely,

Brian Thompson
Chair
Lewis Voluntary Stewardship Program Workgroup