



WASHINGTON ASSOCIATION OF CONSERVATION DISTRICTS

**WACD POLICY # 2013-001
CONSERVATION DISTRICTS' CONSOLIDATION – PRO AND CON**

A frequent question raised by legislators and other decision-makers is *why there are 45 conservation districts when we have only 39 counties in Washington State*. Granted, this question assumes an often misinterpreted relationship between counties and conservation districts in terms of organization, purpose, funding and governance. And it is often asked without an understanding of how and why conservation districts were established, and how they are maintained, as state-subdivision special purpose districts under state law. Nevertheless, **conservation district consolidation** has been a periodic occurrence in Washington's history since districts were established. Case in point: in 2012, three conservation districts merged into a single, county-sized district (Grant County CD), reducing our number from 47 to 45. Looking at the conservation district map, we see ten conservation districts not meeting what may be considered to be a general consistency with their respective counties' size and boundaries.

Together with the supervisor elections issue, district consolidation is a topic that sometimes arises in state budget discussions with legislators. ***As of May, 2013, both House and Senate 2013-15 budget proposals include proviso language that requires the Washington State Conservation Commission (WSCC) to consider district consolidation options related to district overhead costs and efficiencies.*** Therefore, it is important that WACD adopt a policy on conservation district consolidation, if we are to be prepared to educate legislators, to deal with legislative inquiry and opportunities, or to respond quickly in the case of formal legislative action.

(Here, it is important to note, for some readers, that the number of governing supervisors on a conservation district board is five [5]. Three of these five supervisors are publicly elected by local citizenry; two are appointed by the WSCC based upon applications submitted through the conservation district. When two or more conservation districts consolidate, the number of district board supervisors is reduced over a period of time to five from some multiple of five, depending on how many districts consolidate. The larger area comprising a consolidated district is then governed by fewer local supervisors altogether.)

In 2012, the Washington State Conservation Commission (WSCC) adopted a revised commission policy on district consolidation. This new WSCC policy established improved procedures and assistance for districts initiating a consolidation process. It is important to note that the revised WSCC policy does not include an advocacy position on consolidation. That is, it does not take a position on whether districts *should*

consolidate, leaving the initiative to the individual districts. WACD commented in support of this policy. WACD believes that **local district initiative** should be the basis for any consolidation effort, rather than forces from outside a district, be it the WSCC or other source. WACD bases this belief on our long-standing support of the **locally-led principle**, and the need to maintain strong local leadership and governance of conservation districts.

The basis for a WACD policy, first then, is that consolidation, should it occur, must come at the initiative of involved conservation districts – **internally**, in response to a shared need for joining together. It follows then that WACD would not support an external influence seeking to **force** conservation districts to consolidate, **against their will**, regardless of the external rationale (e.g., simply accommodating allocation or other logistics; making an assumption about perceived efficiencies).

A WACD policy on district consolidation is not enough to satisfy questions arising about the issue. WACD also should identify the factors that would (or *should*) cause two or more conservation districts to determine whether they may wish to consolidate – pro and con.

Considering Consolidation - Pro and Con

This WACD policy is based on the assumption that a conservation district's decision to consolidate with another district is really a self-determination of **proper governance**. Conservation districts are founded on the **locally-led principle** – a principle based on recognition that a conservation district board of supervisors governs the conservation district to provide the local leadership, accountability, and trust needed to effectively respond to natural resource concerns of citizens in their local area. At what point does governance improve through consolidation? At what point does a *consolidated* conservation district become so large or contain so varied, divergent and competing interests that its five-member board of supervisors loses its **critical locally-led nature**? A decision on merging, while it often involves consideration of administrative and technical costs, also comes down to what the board(s) believe is the proper governance for the local area. *Who sets policy? Who makes decisions?*

Districts already share many resources to a large extent, either on a short-term or permanent basis. This level of cooperation has resulted from personnel shortages and the need to accommodate reductions in funding for basic infrastructure – and from **a failure to expand resources to meet an expanding demand for services**. This, together with the **need to become more efficient** in services delivery has driven greater collaboration among districts. Most prominently, districts share engineering services (cluster engineers), conservation planners, financial personnel, or even a district manager. Districts have entered into inter-local agreements to share resources and objectives. Districts have shared partner agency (NRCS) technical staff resources for many years, as federal agencies have reduced staff levels. It is expected that the

drive to become even more efficient and reduce overhead costs will continue to improve resource sharing and collaboration across district boundaries.

At what point, then, should a conservation district decide that its board of supervisors is in need of, or suitable for, merging with a neighboring board of supervisors to form a new, consolidated district? What in the governance process indicates that this should – or *should not* – occur?

WACD recommends that conservation districts consider, from a governance standpoint, the following factors - both pro and con - for consolidation, looking at the benefits and possible risks associated with district consolidation. Note that some of these factors may be included in the Good Governance process, whereby districts' performance is evaluated and corrective action and education are also indicated.

Pro:

1. A district may share staff resources and objectives to the degree that a **single point of staff supervision or policy-setting** is required to maximize services delivery, reduce duplication of administrative workload, and to avoid conflicts in scheduling, compensation or employee actions.
2. A board of supervisors may suffer from **poor governance** (poor performance) to the degree that is not corrected with training, and merger with a neighboring well-functioning board is indicated, as a last resort, to resolve these problems.
3. A board may not generate local candidates for **supervisor elections** sufficient to sustain a full – **and active** - board of supervisors.
4. District board **expenses** may warrant savings achieved through consolidation (in conjunction with other benefits).
5. Two or more conservation districts (contained within a single county) may find **more receptive county leadership** to adopting an assessment or rates and charges for a consolidated, county-area conservation district.
6. Two or more conservation districts may determine that their local resource concerns (and/or state or federal resource concerns) consistently **overlap**, making consolidation result in a more efficient and effective resource targeting of available funding and planning resources.

Con:

1. A consolidated district's larger size and land area may lead to a **loss of true local representation, leadership and accountability**. A too-large consolidated district (e.g., regional scale district) may lose the ability to **govern effectively** (representatively) with a five-member board.
2. One district's leadership (board) may be **overwhelmed** (subsumed) by another via consolidation, leading to a loss of local leadership and fairness in addressing a combined area's resource concerns.
3. Neighboring conservation districts may share resources while having substantially **different local policy approaches** to conservation services, based on resolutions or policies adopted by the board of supervisors.

4. Adjacent conservation districts may be sufficiently different in terms of resource needs, customer type, agricultural practices, etc., so as to **lose fairness and equity** in their response capacity with consolidation (limited resources prioritized to one area's issue at the expense of another).
5. **Insufficient funding** (already a problem for districts) may be allocated to a larger, consolidated conservation district area, depending on funding allocation formulae developed by the WSCC.
6. Existing critical **local district partnerships** may be jeopardized if local ties (via board of supervisors) are lost or weakened through consolidation.
7. Pressure may increase to involve county officials in conservation district leadership selection (e.g., **district supervisor appointment by county officials versus public elections or WSCC appointment**) as districts consolidate into county-size districts, resulting in a loss of accountability to a **direct electorate or state authority**.
8. Legislative pressure may increase to **replace needed state appropriations** with limited county-assessed funds as districts consolidate into county-size districts, resulting in loss of critical state infrastructure funding for conservation districts.
9. Legislative (or county) pressure may increase with district consolidation to county-size to **incorporate conservation districts (now special purpose districts) into their respective general purpose, local government units**, resulting in a loss of state-level partnership and program and administrative support, and likely local shifting of funds away from conservation work to general purpose government priority functions (e.g., police, fire, criminal justice, as testified to by local government officials during 2012 hearings on junior taxing/special purpose districts).
10. In terms of natural resources, agriculture, urbanization and other conservation issues, there is nothing special about **county or other political boundaries**. These boundaries are not set using criteria related to naturally-occurring resource similarities. Political boundaries are often set using natural resource features as **separating** boundaries rather than as **uniting** natural features. Such organization of conservation districts (as an end-product of consolidation) could be inefficient and ineffective in some cases compared to existing boundaries for conservation districts.

In summary, WACD adopts as policy that, **when conservation districts identify their own need to consolidate, and when it works locally to better meet the conservation needs of the community, improve efficiencies and conservation services delivery, and sustain the locally-led principle, WACD supports the process.** WACD should collaborate with the WSCC to advise and inform conservation districts about the factors that should be evaluated when considering an option to consolidate with a neighboring district, compared to other collaborative approaches.

It follows that WACD would not support legislative conditioning of overall appropriated funds, or development of WSCC funding allocation policies, that are intended to (or that inadvertently) provide a **dis-incentive** to maintaining current

(separate) governance for districts sharing similar resource concerns or geographic/political boundaries. WACD should share information with legislators and others to educate decision-makers about collaborative efforts between conservation districts, and about how these may be more effective than consolidation as an option for improving the efficiencies and effectiveness of conservation districts. WACD should emphasize that consolidation is not necessarily the appropriate mandate to attempt to improve a good system. Increased use of collaborative partnerships, inter-local agreements, and sharing of information among districts is a better way to achieve desired results to improve the statewide conservation delivery system.