

To: Department of Ecology

December 20, 2022

RE: Voluntary Clean Water Guidance chapters and/or Nonpoint Source Pollution Plan

Department of Ecology,

My name is David Gady, I farm in Spokane County. I am 4th generation farmer in Washington and a 2nd generation dryland farmer in Spokane county. I raise mainly perennial crops with annual crops for rotation crops, I also raise livestock. My biggest natural resources are land, soil and water. I do my best to utilize these natural resources to the best of my ability. I have no control over the weather, so when I am thinking about crop rotation, fertilizer, chemical, and marketing decisions, I am trying to predict the weather, so I maximize my production potential without loss to my natural resources. Healthy soil, clean water and clean air are very important to me, but I still need to make a profit.

I have been involved in many research projects, ranging from machinery development, no-till, water runoff, infiltration, soil health, chemical trials, just to name a few. Every research project has always had a bias in it one way or another. These draft chapters (Chapters 1,6,10, and 12) from Department of Ecology have a definite bias. That bias is to get rid of agriculture, even though it outlines how important agriculture is to Washington State. The reason I say this is that in each draft chapter, there is no data to show the economic impact to the farmer or rancher to your voluntary recommendations, just the impact to the environment.

It also bothers me that I am only given 23 days to respond to these chapters. Something that Ecology has spent many years, months, days and hours working on, with what I assume is multiple people. It would take more than 23 days for good researcher that was well versed in each of the chapters to fully comprehend what you have in these chapters.

It also of great concern to me that you call this voluntary clean water guidance for agriculture. Remember I live in Spokane County, I have seen where Department of Ecology has put their “voluntary guidance” to farmers or ranchers and then been told that if you do not work with Department of Ecology, that Department of

Ecology has the ability to fine you to make you comply. That does not sound voluntary.

To me, all 4 chapters work together, but you want me to submit each chapter on separate submittals. I think this is on purpose, since it takes more time for me to make 4 submittals, and you now I other jobs to do.

Chapter 1: First off, I do not like the works Best Management practices. These are just management practices, not necessarily the Best. You probably hear this all the time, but a practice that works wonders for one farmer might be disastrous for another farmer. Second off, I am a perennial grower and you gave mention to it, but that was it. All the practices, as far as I am concerned, are for annual croppers that are not dealing with perennial material. You also talk about cover crops. Many times, we do not have the moisture for cover crops, so cover crops are a moot point.

Chapter 6: I think your sediment basin has merits, if farmers have a need. I have seen a big, well vegetated sediment basin that have worked well unless wrong weather conditions happened.

Chapter 10: This chapter is just so far off from reality that it is even hard to comment on. Department of Ecology has put down a blanket approach that we are to follow regardless of practicality, cost, or effectiveness. Nice slopes very little soil showing. Due of the “potential to pollute” the creek was fenced off and livestock not allowed to enter, there are now vertical sides, woody vegetation down the middle of the channel, under the old plant/grass vegetation the banks are eroding. As far as I am concerned this is not good management forced by Department of Ecology.

On page 10d you reference that “There is a wide variety of fence types, but the material and construction method chosen must ensure that livestock do not enter restricted areas at any time.” The majority of the time when the livestock would get into that area is when wild animals break the fence, regardless of type of fence.

There is also reference about set backs that I feel are arbitrary with no on site data to show that they work.

Chapter 12: This is a major concern with my biggest concern being the set backs at a minimum of 200 ft. This in many places would make my areas useless. With the area not being usable would have an economic impact on me.

Like I said earlier. There is so much information, some useful some not that it would take much longer than 23 days to understand the drafts and for me to address all my concerns. So I have given you a brief and pointed instances of my concerns over this “voluntary guidance” draft. Again, after working with Department of Ecology, my feeling is there is an underlying goal to get rid of agriculture in the State of Washington. Also, I think that the Department of Ecology can not be trusted in their “Voluntary Guidance” as I have seen in Spokane County.

Thank