



WASHINGTON STATE POTATO COMMISSION
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December 19, 2022

Thank you for the opportunity to comment on Washington's Water Quality Management Plan to Control Nonpoint Sources of Pollution (Nonpoint Plan). It's the mission of the Washington State Potato Commission to support a viable and sustainable Washington State potato industry that can feed our ever-growing population.

While programs and techniques to address natural resource concerns and production challenges continue to evolve, the federal approach, which our farmers appreciate relies on voluntary farmer participation in designed on farm conservation programs to help agricultural producers make and maintain improvements on their land. Participation in these conservation programs is driven by direct technical and financial assistance.

This is an important reference in the context of the impact of the proposed Riparian Management Zones (RMZs) on potato farmers. The "Voluntary Clean Water Guidance for Agriculture" seems to introduce the RMZs as voluntary. However, the "Washington's Water Quality Management Plan to Control Nonpoint Sources of Pollution" identifies their primary tools to guide and promote implementation of the strategy to include actions that are regulatory rather than voluntary (e.g., TMDLs, STI projects):

- Water Clean-Up Plans -TMDLs, which are plans for restoring impaired waters, as required by the federal Clean Water Act.
- Straight to Implementation (STI) projects, which implement BMPS to achieve compliance with state water quality law using Ecology's state nonpoint authority.
- Other water clean-up projects in advance of a TMDL.
- Grant and loan programs.
- Complaint Response and Inspectors.
- Education and outreach, and voluntary programs.

Specifically, under the Ecology plan potato farmers could be precluded from federal assistance, if the plan is regulatory. Can potato farmers continue to operate and function without the help of federal conservation guidance? If not, that would seem to directly contradict the stated intent to "help agricultural producers make and maintain improvements on their land." Without federal conservation assistance potato farms will not be able to work towards the State's water quality goals.

The "Washington's Water Quality Management Plan to Control Nonpoint Sources of Pollution" draft also lays out specific key principles in the implementation of the proposed nonpoint strategy. This includes the following principle: "Target effectiveness monitoring where implementation of BMPs has occurred."

By targeting water quality monitoring to areas where the best management practices (BMPs) have been implemented, the Department of Ecology is missing the critical opportunity to validate whether these BMPs are effective in comparison to other potential approaches.

There are fundamental issues within the current document which need attention. The state must make a workable program for all farms in Washington State to meet the legislative intent of keeping farms viable in our state.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Harris', with a long horizontal flourish extending to the right.

Matt Harris
Director of Governmental Affairs
Washington State Potato Commission