

WASHINGTON FARM BUREAU

To: Washington Department of Ecology via: Online Comment Portal

Date: December 23, 2022

RE: Voluntary Clean Water Guidance – Riparian Areas and Surface Water Protection

The Washington Farm Bureau is the state's largest agricultural organization representing more than 49,000 member families statewide. We are a voluntary, grassroots advocacy organization representing the social and economic interests of farm and ranch families at the local, state, and national levels. We respectfully request consideration of the below recommendations on behalf of our members.

The Department of Ecology has proposed Chapter 12 - Riparian Areas & Surface Water Protection as part of the Voluntary Clean Water Guidance for Agriculture (VCWG). As the VCWG in its entirety stands as a voluntary recommendation, the proposed language in Chapter 12 is far too broad and impractical. Using Site Potential Tree Height (SPTH) for riparian restoration ignores responsible stewardship, dismisses comprehensive science and is void of practical application. The proposed riparian buffer best management practices do not adequately consider the positive impacts of current state and federal conservation practices such as CREP, ACEP, EQIP, CRP and others including the Washington Voluntary Stewardship Program, which is not even mentioned in Chapter 12 and continues to be underfunded. The economic impact of volunteering lands for SPTH on any size farm would require serious considerations and may lead a farmer to implement federal conservation programs that require less land removed from production and are more economically balanced.

Thank you in advance for your consideration of our comments. We encourage the Department of Ecology to draft voluntary guidelines that use comprehensive science and conservation strategies already in place by other programs.

Sincerely,

/s/

Caleb Gwerder
Governmental Affairs Coordinator
Washington Farm Bureau