

November 20, 2025

Washington State Department of Ecology
Water Quality Program
P.O. Box 47696
Olympia, WA 98504

Dear WA Dept. of Ecology,

Please consider these comments regarding Ecology's Proposed 2025 Water Quality Management Plan to Control Nonpoint Sources of Pollution, sent with the best intentions to preserve and protect the rivers and streams of our beloved state.

It is well established that non-point sources of water pollution are a leading threat to surface water quality in Washington and that robust riparian buffers are the best way to filter out pollutants before they reach the rivers and streams. I commend Ecology for your comprehensive evaluation and documentation of the types of buffers and the range of efficacies. Anyone who takes the time to read the chapter on riparian buffers will conclude that Ecology has done your homework and clearly explained what needs to be done.

Some commenters state a need for regulatory back up and enforcement that goes beyond just educating landowners about the benefits. I agree and this is why. Due to the vital importance of riparian buffers we cannot just rely on those who do the right thing to sustain the environment that makes us who we are. We have to protect our environment against those who willfully abuse the opportunities they have to own land and reap the associated benefits. The number of abusers may not be large, but the potential for damage is high.

To illustrate and emphasize this point: Because children rely on adults to protect them during vulnerable stages of growth and development, and because children are so precious, we strictly enforce laws against speeding in school zones. These laws go beyond educating the public and placing warning signs. We issue fines and, when necessary, prosecute those who speed through school zones. Protecting the spawning grounds of salmon and other endangered species is not much different.

Moving along: With all due respect I disagree with comments from a coalition of twelve agricultural organizations.

1. Since 2017, as members of Ecology's Agriculture and Water Quality Advisory Committee, these organizations have enjoyed the opportunity to participate in creation of non-point source policy. This opportunity was denied to environmentalists. The

chapter on riparian buffers was completed in 2022. Calls for renewed analysis at this time are inappropriate and too late.

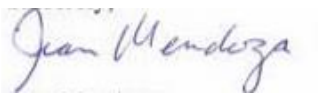
2. These ag organizations seem to believe that allowing stream temperatures to exceed the legal and safe threshold 10% of the time is an acceptable benchmark. They say, “However, the Department of Ecology appears to be selectively presenting data and overlooking evidence that demonstrates that stream temperatures remain below the legal threshold 90% of the time and recover to natural conditions within a few years after timber harvesting.”

Let’s talk about what that means. Meeting standards 90% of the time means that one out of ten spawning salmon may not survive the trip upstream simply because river water is too hot. Meeting standards 90% of the time means that one out of ten redds will not survive simply because the stream water is too hot. This means that the diets of Orca whales will be reduced by 10% simply due to reduced salmon runs that are impacted just by water temperature and not accounting for other negative impacts.

3. I sincerely believe that most farmers want to protect the environment and that many would disagree with their leadership in a robust face to face discussion about the importance of riparian buffers.

In conclusion, I support Ecology’s Proposed 2025 Water Quality Management Plan to Control Nonpoint Sources of Pollution with a recommendation to add regulatory backup that ensures placement of protective riparian buffers. I respectfully ask the agricultural community to look more closely at the reasons for strong buffers and take a friendlier, more synergistic approach towards this policy.

Sincerely,

A handwritten signature in blue ink that reads "Jean Mendoza". The signature is written in a cursive, flowing style.

Jean Mendoza

3142 Signal Peak Road
White Swan, WA 98952