

Dear Department of Ecology,

Thank you for the opportunity to comment on the Voluntary Clean Water Guidance for Agriculture.

On behalf of the Washington State Potato Commission and the growers we represent across the State, I want to underscore what's at stake. Potatoes are one of Washington's signature crops and a cornerstone of our state's food processing and export economy. When you disrupt a potato operation—whether by reducing workable acres, tightening irrigation flexibility, or introducing uncertainty into compliance expectations—you don't just affect a single farm. You ripple through processors, storage operators, transportation networks, and the broader rural economy. The potato community is responsible for \$7.4 billion in economic activity and over 32,000 jobs in the State.

That's why clarity, practicality, and true voluntariness in this guidance matter.

After reviewing the document, we see two fundamental issues that need to be addressed.

First, the BMPs are framed in a way that does not read as truly voluntary. For growers with highly integrated irrigation, storage, and rotation systems—like Washington potato producers—anything that hints at a regulatory backstop creates real operational and economic risk. If the state intends these practices to be optional tools, that must be stated plainly and repeatedly. Voluntary cannot be voluntary-in-name-only. Anything less creates the impression that enforcement is waiting on the other side of non-adoption, which is neither workable nor constructive.

Second, the guidance leans heavily on large, inflexible riparian buffers that simply do not align with the agronomic realities of irrigated row crops<sup>1</sup>. Potato acreage is planned years in advance to maintain soil health, manage pests, and meet processor contracts. Removing large swaths of land from production isn't a theoretical concern—it's an immediate hit to food supply, farm viability, and the state's food processing sector. Moreover, credible research—such as the Pizimenti study and other agricultural-led efforts—shows that targeted, right-sized buffers can deliver meaningful water-quality outcomes without sacrificing productive land<sup>2</sup>. Bigger is not always better, and often not feasible<sup>3</sup>.

We strongly encourage Ecology to anchor this guidance in programs that have already proven successful. The Voluntary Stewardship Program is delivering real results in 28 counties by pairing conservation outcomes with agricultural viability. It works because it gives landowners the flexibility to implement practices that fit their operations, and it builds trust rather than fear. Washington's potato growers have seen firsthand how voluntary, collaborative approaches outperform mandates. The guidance should more explicitly incorporate VSP principles and highlight its results to EPA.

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<sup>1</sup> Washington Department of Fish & Wildlife, Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications, May 2018.

<sup>2</sup> Kallestad & Swanson, Riparian Buffers for Western Washington Agriculture, Aug. 2009.

<sup>3</sup> W.H. Emmingham, Tree Buffers along Streams on Western Oregon Farmland, OSU Extension, 2014.

We also encourage Ecology to prioritize bringing the remaining non-VSP counties into the program rather than layering on new, duplicative frameworks. Washington agriculture does not need fractured compliance systems—we need consistent, practical tools that support both environmental goals and food production.

Washington's growers operate on tight margins in an increasingly unpredictable environment. Additional regulatory pressure—especially when framed as “voluntary” but structured as mandatory—only undermines the resilience of our food system. The State needs more irrigated, productive farmland in the decades ahead, not less, and that makes flexibility and operational realism essential.

We therefore urge Ecology to clearly reaffirm that the BMPs in this guidance are optional tools, not compliance thresholds; that non-implementation does not constitute a water-quality violation; and that small, targeted, science-based buffers remain fully acceptable<sup>4</sup>. These clarifications are necessary to maintain trust and ensure the agricultural community, including Washington's potato growers, can continue participating in voluntary approaches in good faith.

Thank you again for the opportunity to comment and for your continued engagement with Washington's agricultural community. We stand ready to collaborate on approaches that genuinely strengthen water quality while preserving the land, infrastructure, and production capacity that keep our state fed.

Sincerely,



Gerody Bryant Greene

Director of Government Affairs

Washington State Potato Commission

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<sup>4</sup> Manelli Shahbazi Moghaddam, The Effects of Riparian Buffer Strips on the Concentrations of Phosphorus in Aquatic Systems in Relation to Land Management Practices (M.Sc. Thesis, University of Guelph, 2021).