



Washington State Tree Fruit Association

105 S. 18th Street, Suite 116 - Yakima, WA 98901 - 509-452-8555

To: WA State Department of Ecology

Date: December 5, 2025

Re: Voluntary Clean Water Guidance Draft

I am writing on behalf of the Washington State Tree Fruit Association (WSTFA) regarding the Voluntary Clean Water Guidance for Agriculture.

WSTFA represents the growers, packers, and marketers of apples, pears, cherries and other tree fruits in Washington State. As a part of the agriculture industry, we pride ourselves on being stewards and maintainers of the land. Clean water is vital to our growers, and we support guidance that is practical, science-based, and clear.

Because this guidance is voluntary, we ask that Ecology avoid using mandatory words like “must” and “shall”. These create confusion and make voluntary practices seem like requirements. Terms such as “may,” “can,” and “should” are more appropriate.

We also ask Ecology to consider how Washington tree fruit orchards function. We are concerned that the practices listed below are not applicable for Washington tree fruit orchards. These are included in chapter 13- Suites of Practices and sections specifically making recommendations for our crops. See specific comments below:

Table 7

- Orchards are permanent, non-tilled crops, which means soil stays in place for many years and runoff is naturally limited compared to annual crops.
- Riparian forests are not a common or practical practice for orchards. Growers depend on planting all farmable land, and losing even a single row of trees creates a major economic impact. And forest or heavy shade buffers next to orchards can cause harm. Dense shade lowers temperatures, slows fruit maturity, and increases disease pressure. These conditions can reduce fruit quality and yield, making forested buffers impractical next to orchards.
- Controlled tile drainage is not used in our region because rainfall is too low for the systems to function, and they are costly to install and maintain.

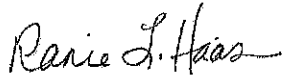
Table 8

It is unclear what the purpose of the practices listed in table 8 is, as most of them, except for Integrated Pest Management, are not commonly practiced by tree fruit orchardists in the Pacific Northwest. For example, contour and terrace farming, which is designed for annual field crops, is not utilized in perennial orchards. Incorporating it into future orchard renovations is not applicable.

In closing, we encourage Ecology to focus on workable, science-based practices and to continue working with growers and technical experts to ensure this voluntary guidance is useful and practical.

Thank you for the opportunity to comment. WSTFA looks forward to continued collaboration with Ecology to protect water quality while supporting a strong tree fruit industry.

Sincerely,

A handwritten signature in cursive script that reads "Ranie L. Haas".

Ranie L. Haas
Director of Regulatory and Industry Affairs
Washington State Tree Fruit Association