

League of Women Voters of Washington (Phyllis Farrell)

LEAGUE OF WOMEN VOTERS OF WASHINGTON

December 5, 2025

Ron Cummings
WA State Department of Ecology, Water Quality Program
P.O. Box 47696
Olympia, WA 98504-7696

Re: Comments on Draft Voluntary Clean Water Guidance for Agriculture Plan

Dear Mr. Cummings:

The League of Women Voters of Washington appreciates the opportunity to comment on the draft Voluntary Clean Water Guidance for Agriculture Plan.

The League of Women Voters of Washington is a nonpartisan political organization. We encourage the informed and active participation of citizens in government. The League acts in support of, or in opposition to, selected governmental issues that its members have studied. The LWVWA has 20 local units and represents approximately 2800 members.

LWVUS Sustainable Agriculture Position: Federal policy should encourage a system of sustainable, regenerative agricultural production that moves toward an environmentally sound agricultural sector. This includes promoting stewardship to preserve and protect the country's human and natural agricultural resources.

Washington's agriculture is a cornerstone of Washington's economy contributing significantly to its GDP and employment. It is of paramount interest to citizens to promote agriculture viability and protect quality agriculture lands. Food availability and quality is dependent on the success of agriculture producers. And protecting clean water is also of paramount interest to citizens. It is in everyone's interest to provide, when needed, technical assistance, the tools of best management practices and support for agriculture producers to protect water quality. It is also a requirement that established clean water standards be adhered to and enforced.

The draft Voluntary Clean Water Guidance for Agriculture Plan is to be commended for the information and strategies for producers. We appreciate the efforts to integrate climate information and provisions, non-point source pollution identification and bacteria contamination threatening water quality.

Every effort should be made to align with provisions of the Growth Management Act and Shoreline Management Act and to include sections on Toxics Reduction and Contaminants of Emerging

Concern and guarantee Tribal treaty rights.

The Plan is to be commended for Ecology's emphasis on a collaborative approach to addressing pollution problems. Ecology should continue to work with partners, including producer groups, Tribes, state and federal agencies, local governments, conservation districts, environmental organizations, and other parties in a collaborative effort to maximize participation in voluntary programs to increase adoption of practices that protect and enhance water quality.

The Guidance Plan has excellent BMPs in Ch. 3 (Nutrient Management) such as livestock exclusion fencing, soil sampling and analysis for augmentation, precision nutrient application, effective manure application methods, and agricultural waste management. Also noted is the requirement for dairy producers to have Nutrient Management Plans, a state CAFO permit to protect groundwater, and a combined State permit (groundwater and surface water/NPDES) for CAFOs requires a Manure Pollution Protection Plan.

Ch 4 Pest Management BMPs include Integrated Pest Management Plans that emphasize prevention by relying on cultural practices and mechanical and biological controls first, then, reserving the use of pesticides as a last resort and only in a targeted manner. Practices in the guidance have the goal of reducing the transport of pesticides to surface or groundwater and to encourage efficient and judicious pesticide use.

Other BMPs include restoring riparian vegetation, irrigation system improvements, stream habitat restoration, control of invasive species, bank stabilization projects, and promoting practices that decrease soil erosion, such as conservation tillage.

From the Focus on Voluntary Clean Water Guidance for Agriculture fact sheet: "If an operation uses practices consistent with our BMPs in this guidance and appropriate to their farm-specific water quality concerns, then we (ECY) will presume water quality is being adequately protected at that operation." This is a generous philosophy benefitting operations, but there should be adequate monitoring to guarantee public and environmental health water quality standards are being met. Violations should be documented and made public to incentivize remediation.

Despite the contentious process developing buffer requirements, rivers, streams and wetlands are critical habitats for aquatic species (especially salmon) and other important species ...and as such require special conservation efforts by farmers. Buffer requirements have been developed using a rigorous process using professionals, science, stakeholders and public engagement...and must be enforced. We support tribal recommendations to strengthen riparian protections.

In conclusion, farming needs to be viable and still protect critical areas. There are programs designed to provide voluntary support for farmers, but for those unable or unwilling to remediate when advisory or technical assistance is offered, enforcement regulations are necessary. Rules without enforcement are useless and endanger the goals of the CWA and ecosystem functioning. The Water Pollution and Control Act RCW.90.48 provides enforcement authority. Enforcement provisions should clear and not be weakened. Water Quality should be paramount.

Thank you for the Draft Plan and the opportunity to comment on it.

Sincerely,

Phyllis Farrell
LWVWA
Agriculture Issue Chair