

Agricultural Group Coalition (John Stuhlmiller)

This submission replaces the 11/25 submission. Please see attached comments.

November 26, 2025

WA State Department of Ecology, Water Quality Program

Dear Department of Ecology,

On behalf of farmers and ranchers across the state, we submit these comments on the Voluntary Clean Water Guidance for Agriculture.

This is a time of unparalleled pressure on farm and ranch families who provide the food, feed, fiber and fuel for our state, nation and the world. At a time when people across the globe are seeking food security, every government action can have an impact (positively or negatively) on our ability to continue to meet the needs of families in our state and around the world.

With this concern in mind, we wish to share our thoughts on the Voluntary Clean Water Guidance, and especially the Voluntary Best Management Practices.

In our review of the guidance as presented, we have identified a number of concerns, but two key deficiencies must be addressed.

First, the BMPs appear to not be truly voluntary, but carry the weight of mandatory practices with a regulatory backstop of enforceable violations on agricultural lands if not fully implemented. The Voluntary Clean Water Guidance must be exactly that- voluntary. All recommendations for practices must be offered as helpful suggestions for farmers and ranchers to consider. Anything short of this clarity leaves open the implication that regulatory action may follow for any landowner who fails to implement the Voluntary Best Management Practices. Please make it exceedingly clear- voluntary means voluntary.

Second, we see a heavy reliance on large buffers as being best science, a fact consistently disputed and challenged by sound science, such as Pizzimenti, J.J. 2005. *Efficacy and Economics of Riparian Buffers on Agricultural Lands* developed by agriculture with private resources to counter agency science. Simply put, the large buffers thought to be necessary in this document are extremely expensive to implement, take too much farmland out of production, have questionable legality, and cannot achieve desired goals because they do not match with currently successful programs now funded by federal, state, and local agencies. We ask that any buffer discussion be constrained by these realities.

We also ask that the guidance include strong references to programs that are currently working in Washington. Chief among these is the Voluntary Stewardship Program. This program is active in 28 counties and is making great strides to protect the environment while maintaining the viability of agriculture. VSP has demonstrated time and again that agencies cooperating with landowners can achieve great results. Results that not only protect the environment but ensure that producers can continue to farm and help ensure our food security. We would like to see a

stronger reference to the VSP program and on the ground benefits of a truly voluntary program within the submission to EPA.

We need to focus attention on encouraging the remaining eleven non-VSP counties to join the program, rather than creating new, potentially conflicting programs.

Ag viability and food security are critical concerns for our nation and the world. Most producers are struggling to make ends meet and additional regulatory burdens only compound the problem.

We strongly encourage Ecology to reframe the text surrounding the “voluntary” BMPs by stressing that these are tools that may be utilized, but failure to implement the suites of practices does not in any way signal failure to meet water quality standards and thus trigger enforcement.

Not all BMPs can or should be employed on every operation. As with VSP, producers who do engage in the program are implementing practices that are valuable to both the farm and the environment. This theme must be expressed in the narrative surrounding the suites of practices.

Ecology should also take great care in re-opening the contentious riparian buffer width conversation. Bigger is not always feasible or better, and it can be devastating to food production. If a producer desires - and is able - to implement larger buffers we commend that, but we need to acknowledge that small buffers can provide quality benefits, too. These too must remain in the voluntary category as resources and capacity of producers allows.

Above all, Ecology must remove any hint of mandatory BMPs with the potential for regulatory action to follow. Doing so will secure greater acceptance by the agricultural community. VSP has proven that voluntary programs work.

Again, thank you for the opportunity to comment.

Sincerely,

Ag Water Board of Whatcom County
Food Northwest
Northwest Agricultural Cooperative Council
Save Family Farming
Washington Association of Wheat Growers
Washington Cattle Feeders Association
Washington Cattlemen’s Association
Washington Friends of Farms and Forests
Washington Potato and Onion Association

Washington State Dairy Federation
Washington State Farm Bureau
Washington State Potato Commission
Washington State Sheep Producers
Washington State Tree Fruit Association
Washington State Water Resources Association
Washington Winegrowers Association
Yakima County Cattlemen’s Association
Yakima-Klickitat Farm Association