

December 5, 2025

WA State Department of Ecology, Water Quality Program

Dear Department of Ecology,

As an owner of the Hofer Farm, located in the Palouse of Whitman County, I am submitting the following comments on the Voluntary Clean Water Guidance for Agriculture on behalf of all of our family members regarding Best Management Practice (BMP) for dryland farming in the Palouse region of eastern Washington.

- We support the content in BMP chapters 1-5 and 8, which cover cropping methods, nutrient management, pesticide management, sediment control, subsurface drainage, and riparian areas.
- The Palouse region's winter-dominant moisture and Loess soils are globally unique. Much of the cited research is not relevant for this area, so BMPs should reflect local climate and soil differences which would require different BMPs.
- We recommend that Chapter 1 (Tillage and Residue Management) and Chapter 2 (Conservation Crop Rotations) be prioritized as **Primary BMPs** in Chapter 13's suite of recommended practices. Supporting BMPs should only be required if there is evidence of persistent, uncontrolled agricultural pollutants entering perennial waterways from ephemeral or intermittent creek beds over two full 3-year rotation cycles. Spring Flat Creek is an intermittent creek bed flowing into the Palouse River during winter and early spring, traveling through the cement flood controlled channel though the town of Colfax.
- We recommend:
 - Amending definitions and tables in Chapter 13 to clarify when Supporting BMPs are required.
 - Updating Table 5 to prioritize Conservation Crop Rotation and add a footnote about riparian management options.
 - Amending Chapter 12 to specify that Riparian Management Zones are not required on cropland with ephemeral and intermittent streams in the Palouse if Chapter 1 and 2 BMPs are applied.
- We recommend accurate mapping so landowners and Ecology can agree on stream classifications relevant to BMP requirements.

- As farm owners we argue that source control and treatment through a suite of practices is preferred, but for the Palouse, decades of observation suggest that prioritizing Chapter 1 and 2 practices is more effective than mandating riparian buffer zones regardless of site conditions.

In light of these considerations, it is essential that BMP implementation in the Palouse region remains flexible and evidence-based. Local adaptation of BMP requirements should be informed by site-specific conditions, allowing for the most efficient and effective use of conservation practices. By prioritizing the practices outlined in Chapters 1 and 2 for ephemeral and intermittent streams, regulatory approaches can better align with on-the-ground realities and long-term resource stewardship.

Thank you for the opportunity to comment.

Sincerely,

Pat Morton

Hofer Farm, Colfax, WA