



August 29, 2025

RE: Comments on the Draft 2025 Water Quality Management Plan to Control  
Nonpoint Sources of Pollution

Dear Director Sixkiller and Nonpoint Source Program Staff,

Thank you for the opportunity to comment on the 2025 nonpoint plan.

Please note that we concur with the collective comments of the agricultural organizations also submitted in this comment process.

We first wish to thank you for the various stakeholder groups designed to seek input from a variety of interests, including agriculture. The opportunity to discuss ideas and issues with agency staff in the formative period of potential rulemaking is very valuable. Collaboration is essential to good government and especially necessary as we address nonpoint issues.

The very notion of nonpoint source means no clear and directly attributable source is in play. Hence, meaningful stakeholder conversations are essential to good, fair public policy outcomes.

Unfortunately, agriculture has watched too many processes ignore our concerns and proceed to regulatory action. As such, we are wary of new programs. Especially because we have some stellar programs focused on collaborative outcomes that have made and will continue to make a positive impact in agricultural communities. Specifically, I call out the state Voluntary Stewardship Program. We have twenty-seven counties actively engaged in protecting the environment and ensuring the viability of agriculture. We need more reliance on this program and less reliance on regulatory approaches. VSP needs to be a centerpiece of our nonpoint discussion and solution.

Unfortunately, the recent Tier II science and forestry rule process has left the natural resources community in a very troubled state. The policy is flawed and the handling of the “science” was poorly done. The resulting damage will be hard to repair. When government ignores

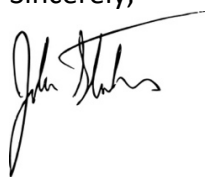
stakeholders and proceeds with irrational, unwarranted, or even illegal decision making, much harm is done. Confidence in the collaborative process is lost and years of building relationships and trust destroyed.

As we continue on the nonpoint path, we must continue to collaborate. And this collaboration needs to be open communication with a recognition that it will take cooperation and reason to truly address the complexity of issues involved in dealing with nonpoint pollution.

We already have many regulations in place that impact agricultural operations. I think of the many NPDES permits in play, including the Irrigation System Aquatic Weed Control Permit. These permits directly impact how irrigation districts operate, and while we are grateful for a program that allows districts to manage their weed problems, it is not without cost.

In conclusion, we hope Ecology will focus on truly voluntary, collaborative efforts rather than more regulations. This will allow agriculture to thrive and continue to provide the food, feed, fiber and fuel our state and nation needs to have a secure and safe food supply. This is an approach we pledge to help succeed.

Sincerely,

A handwritten signature in black ink, appearing to read "John Stuhlmiller", with a long horizontal line extending from the end of the signature.

John Stuhlmiller, Executive Director  
Washington State Water Resources Association