



WASHINGTON STATE POTATO COMMISSION
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June 9, 2025

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

Dear Director Watson and Nonpoint Source Program Staff,

On behalf of the **Washington State Potato Commission (WSPC)** and the state's potato growers—who produce approximately **24% of the nation's potatoes**—we appreciate the opportunity to comment on the **Draft 2025 Water Quality Management Plan to Control Nonpoint Sources of Pollution (the Plan)**. The Commission supports clean water, collaborative environmental stewardship, and regulatory frameworks that are both science-based and implementable.

Below are our comments organized into concerns and proposed solutions.

1. Concern: Agricultural Land Use Disproportionately Framed as a Leading Polluter

The Plan repeatedly identifies agriculture as a leading contributor to nonpoint pollution. While we acknowledge that agricultural activity influences water quality, we emphasize that **many potato growers already implement robust conservation practices**, often at their own expense.

Proactive Solution:

- **Include recognition of conservation success stories**, especially from growers participating in **Voluntary Stewardship Programs (VSP)** and conservation district initiatives.
- Create a **"Good Stewardship Acknowledgment Program"** within the Plan to publicly recognize operations demonstrating sustained compliance and conservation leadership.

2. Concern: Riparian Buffer Standards May Reduce Productive Farmland

The strong emphasis on riparian buffers—while valuable in some contexts—risks prescribing **one-size-fits-all setbacks** that **limit productive use of irrigated land**, particularly in rural Washington.

Proactive Solution:

- Develop a **flexible buffer framework** based on **site-specific risk assessments** rather than blanket widths.
- Allow for **agronomic alternatives** that meet water quality goals—such as **cover cropping, vegetated filter strips, or precision irrigation/drainage management**—in lieu of fixed buffer distances.

3. Concern: Regulatory Overreach Without Clear Pollution Attribution

The Plan enables regulatory action not only after pollution events, but when there is “substantial potential” for pollution. This proactive enforcement authority must be accompanied by **clear standards, data transparency, and landowner engagement** to avoid arbitrary enforcement.

Proactive Solution:

- Require that **enforcement actions be supported by site-specific data** (visual observation, water testing, or peer-reviewed modeling).
- Include language committing to **prioritized outreach and technical assistance before enforcement**, following a clear graduated pathway.
- Invite agricultural stakeholders to help develop **predictive tools** like SPARROW models to ensure **realistic inputs and outputs**.

4. Concern: Insufficient Integration of Voluntary Programs and Industry Expertise

The Plan underrepresents the role that existing programs—such as **WSDA’s Nutrient Management Technical Services (NMTS), Conservation District BMPs, and our Tri-State Research Program**—already play in pollution prevention.

Proactive Solution:

- Integrate a formal **“Agricultural Coordination Chapter”** in the Plan, to align with Conservation Commission, NRCS, and VSP program goals.
- Develop an **Agricultural Advisory Committee** to Ecology's Nonpoint Workgroup, ensuring that industry practices, science, and constraints inform implementation.

5. Concern: Unfunded Implementation Mandates

Farmers are already making costly investments in **irrigation efficiency, runoff prevention, manure management, and conservation tillage**. If the Plan introduces new BMPs or physical infrastructure requirements (e.g., fencing, buffers, nutrient capture), it must be matched with **funding support**.

Proactive Solution:

- Expand eligibility for **Section 319 grant funding** and state capital programs to include **cost-share for voluntary BMP upgrades** on irrigated vegetable lands.
- Create a **rapid-response technical assistance fund** administered by Conservation Districts to support plan compliance.
- Advocate for **state-level match dollars** to unlock additional federal conservation funds.

6. Concern: Climate Adaptation Language Risks Misalignment with On-the-Ground Needs

The Plan discusses climate risks broadly (e.g., heat, drought, wildfire) but doesn't yet provide **clear tools or strategies** to help potato growers adapt or mitigate impacts.

Proactive Solution:

- Add a **"Climate Resilience in Agriculture"** section that includes practices such as **variable rate application, rotational cover crops, improved irrigation scheduling**, and soil organic matter building.
- Prioritize climate-smart funding for crops **with measurable water quality or GHG benefits**, including potatoes grown under precision water and nutrient management systems.

The Washington State Potato Commission and its growers remain **committed to clean water, science-based solutions, and shared responsibility** for watershed health. The 2025 Draft Plan is an ambitious and valuable framework, but it must maintain a **balance between environmental protection and agricultural viability**.

We urge Ecology to fully integrate industry partnerships, flexible implementation pathways, and adequate financial support into the final Plan. We stand ready to collaborate.

Sincerely,



Matt Harris

Assistant Executive Director & Director of Governmental Affairs
Washington State Potato Commission