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A simplistic review of the non-point plan is that it is full of misleading statements and assumptions from Ecology's reliance on partners to do the heavy lifting of water quality protection then blaming the entities that progress in water quality improvement is not happening fast enough.

Statements that NRCS BMPS are not designed to be compliant with state standards requiring Ecology to develop its own guidance document. This guidance document originating as voluntary is portrayed in the plan as regulatory and moving into that direction.

Agriculture, specifically Livestock receives an inappropriate focus of the document with some mention of septic's and stormwater. There seems to be little or no acknowledgement of recreation, direct human impacts and other sources of non-point pollution.

Science is referenced as peer reviewed research documents, these are selected to meet the desired conclusion. There is no mention of site specific or real life success or failure examples of BMPs.

There needs to be more focus on proving there is actual water quality violations rather than assuming because there is a visual observation of the potential on a one day watershed assessment.

The plan has no timelines or clear expectations of compliance. Progressive implementation of BMPs is mentioned in the plan. This adds to the uncertainty and mistrust by the landowner and Ecology's partners of the agency's true intentions.

Buffers and exclusion seems to be a primary focus and one size fits all. This is not scientific or realistic or attainable. Many landowners believe this is a government overreach and considered a taking.

As a representative of a Conservation District very familiar with Conservation Commission and Natural Resource Conservation Service programs and operations the partnership described is not as strong as described. I was told that the Conservation Commission gave early input to the plan specifically to the Commission role and program and Ecology failed to accept most of the comments.

Referring to the 2025 survey sent to Conservation Districts, I see less than half responded, I did not respond because the survey was leading to get specific responses and could not comment our CDs true working relationship with Ecology at the watershed level.

I understand this plan is written to satisfy EPA requirements so Ecology can continue to receive federal funding and keep control of protecting water quality in the state. This plan is not a useful document for the landowners and other entities assisting in the protection of water quality from non-point pollution.