



WASHINGTON STATE POTATO COMMISSION
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August 4, 2025

Cassey Sixkiller
Director
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Request for Hardship Variance Provisions for Washington Potato Farmers under the Refrigerant Management Program

Dear Director Sixkiller,

On behalf of Washington's potato farmers and the agricultural community we represent, I respectfully request that the Department of Ecology incorporate hardship variance language into the Refrigerant Management Program (RMP) to address unique operational and economic realities facing our industry.

Washington's potato sector is a cornerstone of our state's agricultural economy, producing over 10 billion pounds annually and supporting thousands of jobs. Potato storage is highly dependent on reliable refrigeration systems to maintain product quality and meet market demands. Unlike commercial retail refrigeration, these systems operate seasonally, often only during the harvest and storage months, yet they fall under the same inspection and reporting requirements as year-round operations.

The RMP's current framework imposes inspection and compliance schedules, registration fees, and operational obligations that do not account for:

1. Seasonal Use Patterns – Refrigeration equipment may be idle for significant portions of the year, reducing leak potential but still requiring the same level of monitoring as continuous-use systems. Growers are not “mothballing” equipment, which is a term under WAC 173-443-145, denoting a long period of time where equipment is not in use.
2. Economic Realities of Agriculture – Potato farmers already operate on narrow margins, facing unpredictable weather, fluctuating input costs, and volatile markets.

The new fees, inspections, and repair requirements—without seasonal exemptions—represent a disproportionate financial and logistical burden.

3. Geographic and Workforce Challenges – Many facilities are in rural areas where access to EPA-certified technicians is limited, making the mandated repair timelines difficult to meet without extraordinary cost.

We strongly support the state’s climate and environmental goals and recognize the importance of reducing hydrofluorocarbon (HFC) emissions. However, without flexibility, the RMP risks creating unintended consequences that could weaken Washington’s agricultural competitiveness and disrupt the stability of our rural economies.

To address this, we respectfully propose that Ecology adopt a hardship variance provision in the program that would:

- Allow agricultural operations to demonstrate significant economic or logistical hardship to request temporary variance or modified compliance schedules.
- Provide seasonal adjustment to inspection frequency when equipment is not in operation.
- Consider fee reductions or exemptions for seasonal-use facilities under a defined threshold of operational days per year.

We believe these adjustments would maintain the integrity of the RMP’s environmental objectives while enabling potato farmers and other agricultural producers to remain viable contributors to Washington’s economy and food supply.

We welcome the opportunity to collaborate with Ecology to develop practical compliance pathways that work for both environmental stewardship and agricultural sustainability.

Thank you for your leadership and for considering this important request.

Respectfully,

A handwritten signature in black ink, appearing to read 'Matt Harris', with a long horizontal flourish extending to the right.

Matt Harris

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