

February 23, 2017

Mr. Ben Rau, Water Quality Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA. 98504-7600

Dear Mr. Rau:

The Interagency Team (Team) appreciates the opportunity to provide input on Ecology's *Draft Process Design – Clean Water Guidance for Agricultural Activities* (Draft Process). The Team generally supports Ecology's goal of producing voluntary clean water guidance for agriculture (Guidance Document). The team also supports the type of background information proposed for inclusion: i.e., the water quality parameters the practices address; applicability and design considerations; implementation considerations and costs for operation and maintenance requirements; and effectiveness. This background will provide practical information and enable users to understand expected pollutant reductions from the practices. It should help Guidance Document users plan, design, implement and maintain the most effective combination of practices that are reasonably expected to support compliance with water quality standards and provide assurance to municipalities that the impact of non-point source pollution is being reduced.

The Team supports the proposed structure for an advisory group being made up of an implementation evaluation workgroup and an effectiveness evaluation workgroup. We agree with the concept of the workgroups working separately, but in parallel, with opportunities for joint discussion during meetings of the full advisory group.

The Team supports the recruitment of advisory group members that will comprise a balanced mix of participants and represent diverse perspectives. We encourage Ecology to ensure the advisory group include a wide range of agricultural producers to account for different perspectives, scales of operation, economic viability, and geographic variability. To the extent possible, representatives of "producers and producer groups" should be farm operators and rural landowners, rather than trade associations, which may have less practical experience.

Ecology is correct to recognize that "It will be important to provide implementation support to landowners to encourage the adoption of voluntary clean water practices, particularly for practices that require significant investment, on-going maintenance, and/or take land out of agricultural production." Additional public investment is needed to incentivize the implementation of effective practices that yield water quality benefits in watersheds where nonpoint sources contribute to water quality impairment.

The Draft Process describes the goal of the *Effectiveness Evaluation Workgroup* to determine what pollution control or reduction can be expected from various clean water practices. The Team agrees with Ecology's plan to use quantitative estimates of practice effectiveness, where possible; with qualitative information used only when necessary. The Team strongly encourages Ecology to utilize credible data and science (as described in paragraphs c-e of the *Effectiveness Evaluation Workgroup* section). Further, the Team supports an independent peer review of the Effectiveness Evaluation Workgroup's final product. We recommend the review be completed by peers representing diverse

Mr. Ben Rau  
February 23, 2017  
Page Two

perspectives, including representatives of producers. We believe this independent peer review process will increase transparency and overall confidence in the process.

When the guidance document is finalized and published, the effectiveness information should be presented in a format that is useful at the farm/site level as well as the basin or watershed scale. The Guidance Document should:

- 1) help landowners compare the costs and benefits of different practices, alone or in combination,
- 2) guide implementation actions necessary to meet water quality standards, and
- 3) help municipalities and others provide technical assistance to producers.

Given the spectrum of site conditions that can impact pollutant concentrations and loading to receiving waters, the effectiveness evaluation workgroup should consider how best to provide reliable estimates of effectiveness for practices that treat or reduce the loading of pollutants. The Guidance Document may need to include additional information on the operational factors and/or site conditions that could alter the effectiveness of various practices and what source control, pre-treatment, and/or practice combinations could improve overall effectiveness and attainment of water quality standards. Ecology should explore and include links to peer-reviewed internet-based conservation practice tools or organizations that could make the process more user friendly and productive.

The Team appreciates Ecology's plan to make progress on the first set of clean water practices by July 31, 2017; but has some concerns with the implementation of "... a rolling process where work on sets of practices are finalized and added to the guidance document on an on-going basis." The Team notes that the Draft Plan is somewhat vague about how the public will be engaged and be allowed to review draft versions of the guidance document before it is finalized. It is suggested that Ecology follow a sequential process: "Advisory Committee/Ecology Develops Draft > Release Public Draft > 30+ day Public Comment Period > Final Document Published" at regular intervals to support participation.

The Team appreciates Ecology's commitment to develop Voluntary Clean Water Guidance for Agriculture using an inclusive, balanced, data-driven process. Please contact Jeff Killelea at 360-867-2073 or [killelj@co.thurston.wa.us](mailto:killelj@co.thurston.wa.us) if you have any questions about our comments.

Regards,

The Interagency Team: City of Bellevue, Clark County, King County, Kitsap County, Pierce County, Snohomish County, Thurston County, and the Washington State Department of Transportation

cc: Melissa Gildersleeve, Watershed Section Manager (ECY)