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November 30, 2012

Office of Environmental Assessment (OEA)
Attn: Carol Harrison
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900
Mail code: OEA-095
Seattle, WA 98101

Re: Review of EPA's Lower Yakima Valley Nitrate Study

Dear Ms. Harrison:

Yakima County appreciates the opportunity to provide comments regarding EPA's recently published study, "*Relation between nitrate in water wells and potential sources in the Lower Yakima Valley*". Yakima County, as Lead Entity of the Lower Yakima Valley Groundwater Management Area's (GWMA) Groundwater Advisory Committee (GWAC), like EPA, is committed to developing and implementing long-term strategies to reduce nitrate concentrations in groundwater below safe drinking water standards. We believe that this same commitment is shared by the citizens, communities, industries, and commercial enterprises that are located within the Lower Valley.

We were optimistic and hopeful that the study would lay a strong scientific foundation for charting a course of action towards our mutual goal of reducing nitrate concentrations. Disappointingly, after our own review of the study and after careful consideration of comments made by individual and industry representatives along with local, state, and tribal entities, we do not believe that the study provides that strong scientific foundation. Instead, the study has created a considerable amount of confusion, distrust, fragmentation, uncertainty, and skepticism amongst affected communities and parties. We believe this negativity is largely due to the limitations documented in the study - most notably the lack of well data and trend data. If the intent of the study is to draw a direct correlation to the dairies based upon sound scientific information, we believe it failed to do so simply because of the study's stated limitations and questionable assumptions.

On a positive note, we believe that the study is an important first step in defining the scope and likely sources of the nitrate contamination in the Lower Valley - it verifies earlier shallow groundwater findings and supports previous theories regarding the potential nitrate sources in the groundwater. In addition, it presents many questions that will undoubtedly provide the GWAC with a technical starting point for further study.

In summary, we request EPA to seriously consider and address study comments received from all parties and to perform additional investigations and data gathering to minimize the study's limitations and assumptions. We remain optimistic that if EPA is able to do so, the study, revised as appropriate, can and would provide the strong scientific foundation that we believe is essential in charting a future course of action.

Again, thank you for your efforts in addressing our groundwater problems and for offering this opportunity to comment.

Sincerely,

J. Rand Elliott, Chairman
Yakima County Commissioners

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