

# **YAKIMA COUNTY FARM BUREAU**

[www.yakimacountyfarmbureau.com](http://www.yakimacountyfarmbureau.com)

**P.O. Box 429  
Wapato, WA. 98951**

November 29, 2012

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

RE: Comments on EPA Study "Relation between nitrate in water wells and potential sources in the lower Yakima Valley."

To Whom It May Concern:

The Yakima County Farm Bureau represents over 3,000 Yakima County members on agricultural related issues in Yakima County, and is the largest agricultural organization in Yakima County. Is a voluntary, grassroots advocacy organization representing the social and economic interests of farm and ranch families at the local, state and national levels. Yakima County produces over \$1 billion in agricultural products annually and is one the most diversified agricultural producing counties in the country.

I am writing to express our concern with the above referenced report. I have recently read several reviews and critiques of this report and found none of them to be in support of or in agreement with the way it was carried out or the conclusions and accusations it makes. All of these reviews were done by independent parties, both private and governmental.

Of particular interest are comments by the Washington State Department of Agriculture (WSDA). WSDA concludes, "The report is limited in its ability to identify specific sources of nitrate." Their report also concludes "The degree of uncertainties raised in the report is limiting as to its use for regulatory purposes."

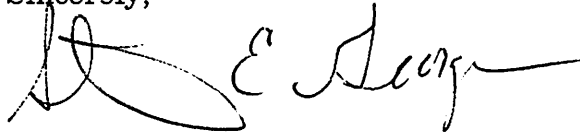
Another review by Glorieta Geoscience, Inc. of Santa Fe New Mexico states  
“Overall the report provides a significant lack of supporting technical  
information for EPA to arrive at the conclusions presented in the report.  
EPA did not produce enforcement quality data from this report.”

I am also concerned that EPA has been less than honest with these recent  
activities (dual track). There is a mechanism to deal with the groundwater  
issue called the Lower Yakima Valley Groundwater Management Area  
commonly referred to as a GWMA, that our organization is involved with.  
EPA is a part of this group and supported its establishment that was  
organized by the Washington State Department of Ecology and designated  
Yakima County as lead entity.

Our concern is that while EPA has been supporting and participating in the  
GWMA, it also has been pursuing a regulatory track that is contrary to the  
GWMA mission. It is especially concerning to us that EPA would spend the  
time and resources pursuing a regulatory scheme when they support a  
voluntary collaborative approach through the GWMA. It is even made worse  
by the fact that the above referenced report is based on such unprofessional  
work. We would think and hope that our federal government could do a lot  
better with our scarce resources.

In summary, the above referenced report is so unprofessionally done that it  
should be withdrawn. EPA should stop all of their secret regulatory activities  
and work through the structure that they support (the GWMA) which is the  
best method for dealing with this issue. This is our valley, we live and work  
here. We should be given the opportunity to address our issues ourselves,  
without governmental regulatory interference. **In addition, the time  
frame for reviewing this report has been very short. More time  
should be allowed for comments.**

Sincerely,



Steven E. George  
President

- c. Governor Christine Gregoire  
14<sup>th</sup> and 15<sup>th</sup> District Legislators  
Yakima County  
Senator Maria Cantwell  
Senator Patty Murray  
Representative Doc Hastings