



Input on Lower Yakima Valley Nitrate Study

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I think EPA is well aware that this study does not provide any conclusive evidence as to what is directly causing high nitrate levels in ground water. Most people in the area know without a doubt the biggest contributor to high nitrates in the Yakima Valley is domestic well construction and residential septic lines. It does not take an expert to understand that the inconsistency of nitrate levels from well to well (sucking water from the SAME AQUIFER) would tell you individual wells are the primary culprit. Since I do not think EPA is so incompetent as to not understand this I am led to believe this whole study is a political witch hunt directed at dairy farms, families and employees livelihood. Think of what you are doing. Look at your own study. EPA obviously was selective in what wells were tested and picked the results which confirmed their conclusion. These were not randomly sampled wells within the same aquifer. They were specifically selected. And you did not even investigate the integrity of the wells at each site. Also, even if you saw a correlation in nitrate levels between wells above dairies and wells below dairies (which you cannot say you found a correlation because EPA was selective in which wells they tested and reported) that does not imply causation. What is one of the first rules of scientific study? "CORRELATION DOES NOT IMPLY CAUSATION". I've heard that in universities time and time again and what did EPA do? They MANUFACTURED a correlation and said that this implied causation. In regards to lagoon leakage, does EPA understand that the lagoons at these dairies were approved by the State of Washington Department of Ecology according to NRCS standards? Therefore even if lagoons were leaking the amount of nitrate EPA says they are, the parties at fault would be Ecology and NRCS. This is so obviously politically motivated and such an embarrassment to the integrity of the EPA that you should be ashamed of even releasing this so called "study" to the public.