

## Norm Peck

Thank you for the opportunity to comment.

The Lower Yakima Groundwater Management Area Committee should be complimented on the thoroughness of the Draft Plan; obviously a lot of quality work on this controversial topic has been completed by a wide range of stakeholders.

In addition to randomly placed monitoring wells, consideration should be given to more intensive targeted monitoring at and around "hot spots" as changes in N concentrations (improvements and further degradation) will be particularly important in those areas.

Because of potential negative effects on fish and fish habitat, ammonia (NH<sub>3</sub>) should be investigated in irrigation return flows to surface waters. Arid area waters tend to be more alkaline than those in wetter areas, and NH<sub>3</sub> toxicity to aquatic organisms increases as pH increases. (EPA Quality Criteria for Water, 1986 as updated). If initial investigations do not indicate a problem, no further monitoring should be required.

Consideration should be given to supplemental funding to include nitrogen analysis of groundwater samples from Superfund/MTCA site monitoring wells within the study area. This would potentially increase the number of available data points within the study area at a very modest increase in cost. Formation of rural PUD Water Districts should be considered among the options for replacement water supplies, particularly in "hot spots" within the GMA.

Incorporation of recirculating sand filters in areas where high density of ROSS should be considered as one option to reduce N concentrations in OSS discharges.

Use of radio educational information on Spanish-language radio stations has been identified as an effective outreach tool to those for whom Spanish is a language used in households in the Yakima Valley. I have been told that many workers who are fluent in Spanish listen to Spanish-language radio at work and while traveling as well as in the home.