

Dan DeGroot

Please see attachment.

Comments on Groundwater Management Area Report

1. Nitrates in the groundwater of the Lower Yakima Valley are a community issue. The report seems to focus mainly on only one area of the community, dairies. The report seems to have a bias against dairies in that there are several mentions of animal nutrients referred to as waste. When manure is properly stored in stockyards, compost areas or lagoons it should be referred to as Nutrient Storage, not Waste. There is one whole section of the report titled Waste Storage Facilities. This section should be edited to be Nutrient Storage Facilities or edited out of the report. All recommendations that refer to nutrients as waste should be deleted because they indicate a lack of understanding on farming process and practices. The word waste was used because of a bias, not an understanding of what needs to be accomplished. If there is going to be bias written in this report it will give a perception that dairies and their nutrients are the source of the contamination in the aquifer. Not only is this completely unacceptable to me, it will lead the community to focus on this as the sole method to mediate the contamination of the aquifer(s). Since the problem of Nitrates in the Aquifer(s) in the Lower Valley were well documented prior to dairy expansion in the late 1980's and 1990's mediating the issue by focusing on a narrow portion of the community will not correct the issue over time. There has been livestock husbandry performed in the valley for over 100 years and even to the current time there are approximately twice as many animals raised for beef than there are dairy cattle. This has not been noted in the report and serves to show the bias that the report has in it. Nitrates in the groundwater are a community issue and needs to have a whole community action to correct.
2. A Minority report that has not been reviewed by the Ground Water Advisory Committee has no place in the final report. This Minority Report is simply one person's opinion and should not have any connection to the work that the whole committee did. It is accusatory and is short on fact, long on fiction. It uses snippets of other reports, takes them out of context to arrive at conclusions that were established based on personal belief. This Minority Report has no place in the final document and should be deleted or risk the Main Report losing its credibility on any of its recommendations.
3. Farming Legacy issues should have been a substantial portion of this report. The way farming practices were conducted over the first 70-80 years of the Sunnyside Canal system (and the later Rosa Canal system) may have had a substantial effect on the nitrogen load in the soil of the area the Lower Valley GWMA. Tillage practices, fertilization practices and irrigation practices were such that large amounts of Nitrogen were put in the soil and had the strong potential to be moved to the aquifer with the common use of rill (furrow)

irrigation. It should also be noted that in the last 30 years there have been many technology changes in all three of these practices that should reduce the amount of available nitrogen in the soil and most importantly not continue to move what nitrogen is in the soil to the aquifer. I believe that this legacy issue should be strongly noted in the report and the fact that the recent changes in common farm practices will have a positive effect on the nitrogen loading of the aquifer.

4. Onsite Sewage Systems (OSS) should be controlled by the county and a plan that is required by WAC 246-272A-015(5) should be developed by the Health Department for OSS. I would recommend that any parcel that requests an OSS permit that is less than 20 acres (just under High Density standards) should have an OSS that is designed to reduce the nitrogen flow in its effluent. OSS are designed to return water to the aquifer, in fact a request for an OSS requires that a percolation test be passed proving that the soil for the drain field will indeed return the water to the aquifer, and a conventional OSS does little to treat nitrogen (less than 15% at best). Drain fields on conventional systems are placed below the root zone so there is no uptake of nitrogen from them. The EPA considers more than 40 OSS per square mile (one per 16 acres) to be high density of OSS and a high risk to the aquifer. For many years the EPA considered OSS to be the primary contributor of contaminants to the aquifers of the United States. There are many areas of the United States where there is little to no farming of any sort that have high nitrate concentrations in the aquifers. This should be of great concern to the stakeholders of the Lower Valley GWMA. I also would recommend that as homes are sold in areas that have a high density of OSS that the county should require the update of a conventional OSS to one that does reduce the nitrogen concentrations in the effluent. If all potential sources of nitrogen are not considered then any efforts to reduce nitrogen in the aquifer(s) will fall short.
5. This report should have been written with the average stakeholder of the Lower Valley GWMA in mind. It is too technical in nature and difficult for the average person to comprehend. It has too many tangential issues throughout it that serve to confuse and mislead those who would like to know what the Ground Water Advisory Committee has discussed and concluded over the past 6 1/2 years. It should be written in simple, plain language and if technical issues need to be cited, they should be another section for those who are interested in them, not spread throughout the report. When we are evaluating an aquifer it tends to affect all equally and discussions of ethnicity, education or economic status really have no place in this report and only serve to encourage bias and divisiveness among the stakeholders of the Lower Valley GWMA.