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See Attachment

Comments on Groundwater Management Area

1. The report is lacking enough of the farming legacy issue of nitrate buildup in the soil. The majority of the farming in the Yakima Valley when irrigation started was by rill or furrow irrigation. This method saturated the soil and caused 30-50% of the nitrogen applied to the surface to leach past the root zone. Crops such as mint, sugar beets, and potatoes that required high amounts of nitrogen were grown in the area. Nitrogen as commercial fertilizer was cheap and applied at heavy rates, from 600 lbs per acre up to 1000 lbs per acre with removal rates of the crops not nearly that high. Farmers were taught as little as 20 years ago to apply 1 lb of nitrogen per bushel corn yield expected. Easily 300+ lbs in our fertile valley. Now that same crop of corn can be raised for less 2/3 that rate and sometimes higher yields. We have purchased new fields that have been farmed and taken soil samples up to 6' deep and found extremely high nitrogen soil tests below the root zone, often in fields that have not had manure applied ever or in recent times (15 years or more). This nitrogen has been there for some time and not recently applied.
2. The GWMA needs to focus on a voluntary and educational approach for all involved parties to help lower the nitrates in the groundwater. This needs to be a community effort that looks forward and makes changes now that can affect what happens years in the future. Finger pointing and only focusing on one aspect of the area, like dairy farms, will not address the widespread issues that need to be changed. The bias towards dairy farms in this report will lead to disappointing results of not addressing all factors resulting in high nitrates in groundwater.
3. The minority report that was written before a final GWAC report was even finished or approved is out of context and very targeted. How can someone even write a minority report before the main report is even finished?
4. Manure is referred to as waste numerous times in the GWMA report. Manure is a useful fertilizer that is used to grow crops and add organic matter and micronutrients to the soil. Higher organic matter has been proven to retain water better and help in drought years and to hold nutrients in the root zone for crops. Commercial fertilizer does not have these qualities.
5. Through the 6+ years of the GWAC work, I have not heard of any cases of blue baby syndrome or other documented nitrate related illnesses in the Yakima Valley. In fact, many studies are showing that high nitrates foods might be healthy for you.
6. The GWAC spent almost 2 years discussing 30 possible test well sites of which were approved. 20 of those wells were funded and drilled. Then in less than 30 days, 11 additional wells that were not approved by the GWAC were funded, sited, and drilled without any communication at all to the GWAC. In 6+ years of being on this GWAC, there has always been numerous emails about every issue. It amazes me that there was no communication at all about the additional wells. Nothing. It's actually quite suspicious since 9 out of 11 of these wells are within 1 mile of

dairy farms. Once again, this shows the targeting of dairy farms and the lack of a holistic approach to solving high nitrates in the groundwater.

7. On site septic systems have not had enough focus or education in this report. The concentration of OSS is increasing with no rules or regulations by Yakima County. OSS is designed to leach all nitrogen to the groundwater. A real threat as the number and concentration of OSS continues to increase in Yakima County.
8. Department of Ecology needs to provide more protection from third party lawsuits for those dairy farmers that have a NPDES CAFO permit and are in compliance with the permit. Spending money on lawyers to defend yourself as a dairy farmer when you are in compliance with the law is targeting. This needs to end