

Hello,

My name is Dan De Boer and I live in rural Yakima County north of Outlook along with my wife and three kids. After review of the data provided on the Yakima County GWMA website I would like to provide my comments as outlined below for your review and I thank you for your consideration.

Goal and Premise of the GWAC

According to the home page the goal of the GWAC is to address all sources of nitrates. However, it appears that research thus far has been almost exclusively focused on large farming and livestock operations. Prior to imposing regulations on one group, I believe more research needs to be done to discover the proportional impact of all sources so as not to overly burden one group over another without knowing their respect impacts to groundwater nitrates.

Equity

The website mentions the GWAC committee is a community-based group. However, it appears many people living outside the GWMA are being asked to participate and may or may not have a vested interest in the affected areas. I would suggest a higher percentage of the committee be comprised of members who reside in the affected GWMA area so as to more accurately represent their community and neighbors' best interests.

If I'm reading the information correctly the increased regulations being discussed will only impact those living North of the Yakima River. This again doesn't appear to align with the committee's goal of addressing all sources of nitrates. This unfairly burdens those North of the river. Although farmers are general friendly with each other, at the end of the day, they do compete in the same market. Increasing regulations on one side of the river makes those folks less competitive than their friends to the South. I warn the committee to guard against potential conflicts of interest in this regard.

Health & Safety

Having lived in the Lower Valley my whole life I have never heard of a local person suffering the health effects of nitrates in the ground water. I see the committee sent surveys to local health officials asking if they had seen illnesses of the sort but I didn't see any survey results. When will the survey results be posted and will they indicate we have an actual health issue? If we are not going to wait for this data to be collected, why then send out the surveys in the first place?

Science

Deep soil sampling, as outlined in the *Outcomes and Challenges* section, admits that our ability based on the data in making broad observations on the farming operations throughout the GWMA is limited. I also found nothing in this study proving causation between farming practices and ground water nitrates. Yes, farms use nitrogen. And yes, there are nitrates in the ground water. But what scientific evidence links the two? How is nitrogen absorption/uptake from crop growth calculated when calculating the nitrogen cycle in the Lower Valley? Seems like a leap of faith is required to tie farming operations to elevated nitrates in groundwater and no guarantee or proof that changes in farming practices will have a measurable impact to nitrates in groundwater. Farmers and dairymen have already been subject to increasing waste management regulation over the last couple of decades. Is there any scientific evidence that these regulations are having an impact? If not, then perhaps there are other theories that need consideration.

Only 12% of tested wells have indicated an elevated nitrate level and the study admits the sample size was inadequate to draw meaningful conclusions. Is there any historical evidence of what the groundwater nitrate levels have been over the last 50-100 years? It might be a good idea for the committee to overlay historical nitrate levels against farming practices over the same time and the population growth of the area of both livestock and people. If this long term (more than a decade) historic data is not available, perhaps a trend or timeline should be established prior to making broad decisions. On a side note, I find it ironic that the City of Sunnyside recently drilled groundwater wells to service its residents in the middle of an old 40,000 cow feed lot. Has there been any elevated nitrate levels in these wells? Have any public wells been analyzed?

Representation

A couple theories were mentioned in the study as to why community members are unwilling to participate in well testing. Ignorance was the primary theory. What the committee and Department of Ecology should know is that many very educated and intelligent citizens of this Valley have a growing discontent with environmental agencies 'taxation without representation' practices. Farmers have also been unfairly targeted by out-of-state profit seeking environmental groups adding salt to the wounds. Lower Valley citizens are being pushed into corners by increased government regulations – regulations enacted by unelected officials. The more regulations that are imposed, like the ones being discussed currently, the more difficult it will be to get citizens to participate in the process. No amount of education will change this – only logic, reason, and cooperation will.

Final Thoughts

Lastly, I wanted to mention that being a lifelong resident in the Lower Valley I know many of the farmers and dairymen and women impacted by these regulations. I see every day how they responsibly steward their farms, I see them plowing county roads when snow storms hit, I see how they raise their kids and the work ethic and morals they instill, I see how they chip in to help neighbors, I see the community service they provide to their communities, I hear about the taxes they pay and the hundreds of people they employ.... these are good hard working people and the type of people this Valley needs to keep. Let us not draw hasty conclusions with unknown benefits based on incomplete science because we don't like their smell.

Respectfully submitted,
Dan De Boer