



Public Services

128 North Second Street • Fourth Floor Courthouse • Yakima, Washington 98901
(509) 574-2300 • 1-800-572-7354 • FAX (509) 574-2301 • www.co.yakima.wa.us

LISA H. FREUND – Director

November 13, 2020

Cole Provence
Department of Ecology
Central Region Office
Water Quality Program
1250 W. Adler Street
Union Gap, WA 98903-0009

Re: Mid-Yakima River Basin Bacteria TMDL – Water Quality Improvement Report, October 2020 Draft

Dear Mr. Provence,

Thank you for the opportunity to comment on the report. Yakima County has reviewed the above draft report and is providing comments (Attachment 1). The draft report represents ongoing years of work by Ecology staff.

Yakima County has shared comments in a previous version of the report. Since that time over five years have passed and the initial author, Gregory Bohn, has since retired. The Technical Advisory Workgroup (TAW), which met prior to previous versions of the draft being written, has not met since 2015. At the County, several staff who provided advice on the reports have retired. Ecology previously wrote, “TMDLs are designed to be implemented by voluntary actions of the interested entities.” We encourage the continual collaboration as this TMDL has once again moved forward.

The Implementation Strategy would benefit from renewed discussion. The more collaborative with those able to carry out the implementation, then likely the stronger the solution.

We continue to acknowledge the need to deal with the bacteria concerns noted in the report. Solutions and implementation actions should first focus on exact pinpointing of causes. There is currently no additional funding for this program, so it is important that any available funds go directly to implementing solutions as quickly as possible and not toward only tracking the issue through monitoring.

Again, thank you for the opportunity to provide comments on your draft document. We appreciate the opportunity to comment on this and previous drafts of this document.

Sincerely,

David Haws, PE, CFM
Environmental Services Director

Attachments:

- (1) Yakima County's suggested text edits and comments

Yakima County ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color, national origin, or sex in the provision of benefits and services resulting from its federally assisted programs and activities. For questions regarding Yakima County's Title VI Program, you may contact the Title VI Coordinator at 509-574-2300.

If this letter pertains to a meeting and you need special accommodations, please call us at 509-574-2300 by 10:00 a.m. three days prior to the meeting. For TDD users, please use the State's toll free relay service 1-800-833-6388 and ask the operator to dial 509-574-2300.