United States Department of Agriculture

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January 14, 2013

Tom Eaton, Director
U.S. EPA, Region 10
Washington Operations Office
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

RE: **NRCS Comment Clarification - Lower Yakima Valley Nitrate Study**

Dear Mr. Eaton:

As requested, NRCS is pleased to provide clarification on the statement made in our response letter dated December 17, 2012 to the EPA regarding the Lower Yakima Nitrate Study. In Attachment 2, NRCS made the following statement:

*"**Summary.** Due to the fact that specific data pertaining to crop management and tillage systems, manure management, irrigation water management, nutrient management, and pest management were not collected or were not available to EPA, utilizing gross or generalized characteristics or data pertaining to soils within the Lower Yakima Valley for purposes of identifying sources of nitrates in well water is not accurate or conclusive.*

It is my suggestion that this report be retracted and data collection begin in earnest, including the above listed management information and the appropriate tests using proper data collection methods and testing techniques. The results of which should be independently analyzed by non-affected parties to enable proper conclusions as to the source of nitrates in water wells in the Lower Yakima Valley."

It is NRCS's position that the report should not have been released until the results of the study yielded defensible and conclusive findings. We strongly believe that it would have been in EPA's best interest to coordinate with all federal, state and local agencies having a vested interest prior to releasing the findings of the study. Given the ramifications and far reaching effects that the study has, a multi-agency peer review would have been warranted.

I appreciate the opportunity to provide clarification on our letter. Please let me know if you have any additional questions.

Sincerely,

LAWRENCE A. JOHNSON, P.E.
State Conservation Engineer

Cc: Roylene Ride-at-the-Door, State Conservationist, Spokane, WA
Bonda Habets, State Resource Conservationist, Spokane, WA