From: Llyn Doremus
To: Jill Gable/R10/USEPA/US@EPA
Subject: RE: Whatcom ARM QAPP
Date: 11/05/2010 09:18 AM

Jill-
I just read over the Department of Ecology's comments on the QAPP, and I don't think my comments could add anything to their comprehensive treatment of the problems with the QAPP. I would echo the need for better groundwater data both for establishing the background conditions and for monitoring of the performance of the sites onto which manure has been applied during winter months.

Additionally, the Nooksack Tribe has been working with the Department of Ecology and with EPA to characterize the fecal bacteria sources, transport mechanisms and distribution in Drayton Harbor. Like the Lummi Nation, we have serious concerns about the ongoing degradation to our shellfish beds, which we perceive to be at least in part resulting from agricultural practices associated with manure application to Whatcom County agricultural production fields. The QAPP does not adequately provide for monitoring, detection, verification and follow-up actions if fecal bacteria is transported from fields where manure is applied for this project to shellfish beds.

On a minor note, I was surprised to read on page 13 that the "Tribes" response to this project was "positive". It is difficult for me to understand how our position on this project was construed as positive. Given the Lummi comment on this same topic, the statement calls into question the validity of the rest of the claims made for the benefits of the project, particularly given the lack of technical references in the document.

Thanks for the opportunity to review and comment on the QAPP. At this time I will not request an expanded role for the Nooksack Tribe in the development, scoping and management of the project. However, if possible, I would like to receive copies of the final version of the QAPP, and the progress reports that are submitted to EPA as the project proceeds.

Best regards,

Llyn Doremus
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-----Original Message-----
From: Gable.Jill@epamail.epa.gov [mailto:Gable.Jill@epamail.epa.gov]
Sent: Thursday, October 21, 2010 3:00 PM
To: Llyn Doremus
Subject: RE: Whatcom ARM QAPP

Thanks so much Llyn. Let me know if you have any questions in the meantime.

jill

Jill Gable, Watershed Unit
US EPA, Region 10
1200 Sixth Ave., Suite 900 (OWW-134)
Seattle, WA 98101-3140
(206) 553-2582, (206) 553-0165 (fax)
gable.jill@epa.gov

From: "Llyn Doremus" <ldoremus@nooksack-nsn.gov>

To: Jill Gable/R10/USEPA/US@EPA

Date: 10/21/2010 02:56 PM

Subject: RE: Whatcom ARM QAPP

Thanks for the opportunity to review this. I'll get back to you with my comments by Nov 4.

Llyn

-----Original Message-----
From: Gable.Jill@epamail.epa.gov [mailto:Gable.Jill@epamail.epa.gov]
Sent: Thursday, October 21, 2010 9:42 AM
To: Jeremy Freimund; Llyn Doremus
Subject: Whatcom ARM QAPP

Dear Jeremy and Llyn,

I am the EPA Project Officer for the Whatcom Conservation District's project "Protecting Puget Sound Watersheds from Agricultural Runoff Using a Progressive Manure Application Risk Management (ARM)." Given the Lummi and Nooksack Tribes' interest in the watersheds around the project area, I would like to provide you with the draft final Quality Assurance Project Plan (QAPP) for your review. EPA is very interested in hearing any comments that you might care to provide about the project. Please just be aware that the final QAPP approval decision is the responsibility of myself (the Project Officer) and the EPA Quality Assurance Project Manager, Ginna Grepo-Grove.

Please provide any comments you may have to me in writing by Thursday November 4. If you do not have any comments, could you please just send me a quick email indicating that as well? I very much appreciate your input on this project. Please do not hesitate to call me directly if you have any questions about this review. Thank you so much for your time.

Sincerely,

Jill Gable

(See attached file: WCD ARM Draft Final QAPP.pdf)
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