

Quincy-Columbia Basin Irrigation District

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RECEIVED

OCT 29 2012

Dept of Ecology
Toxics Cleanup Program

October 25, 2012

Adrienne Dorrah
Washington Department of Ecology, Toxics Cleanup Program
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Dorrah,

The Quincy-Columbia Basin Irrigation District appreciates the opportunity to comment on Ecology's *Fish Consumption Rates Technical Support Document, Version 2, Publication No. 12-09-058* which is intended to support discussion on Sediment Management Standards rulemaking and to facilitate considerations in revising Surface Water Quality Standards.

The Quincy-District is concerned with the inherent uncertainty in evaluating and estimating fish consumption rates for northwest fish consuming populations and with how the information in this document will be used to promulgate administrative rulemaking.

In Section 4.2, Ecology states that the regional survey data "... could be used to estimate fish consumption rates protective of Washington State's fish-consuming populations." These surveys do not solely provide for the complexities of this topic and should not be endorsed solely to support regulatory decision making. Such a decision to use the provided fish consumption surveys would be a choice of policy and is contrary to the purpose of the document to only compile available and relevant data. While considering protective fish consumption standards, other factors to be considered include evolving demographics, data gaps, differing datasets, geographic variability, and the consumption of anadromous and non-anadromous species.

The Quincy-District has considerable investments in equipment, employees, and processes, to ensure best management practices are followed during the operation and maintenance of our facilities. The consequences of endorsing and utilizing the findings of a partial assessment as the basis for future rulemaking could be damaging to our business and farm economies.

The Quincy District greatly appreciates the opportunity to comment and respectfully asks that these comments be taken into full consideration while drafting the Fish Consumption Rates Technical Support Document.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Gyselinck". The signature is written in a cursive style with a large initial "C".

Craig Gyselinck

Water Quality Programs Manager

Cc: Darwin Fales, QCBID Manager
Richard Lemargie, Attorney
Tom Myrum, WSWRA
Craig Simpson, ECBID
Dave Solem, SCBID