

From: [Everett Billingslea](#)
To: [ECY RE Fish Consumption](#)
Subject: Comments on Proposed Revisions to Fish Consumption Rates
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Clearly, Washington is one of the most environmentally aware and progressive states in the country. We have stringent federal, state and local (particularly in Seattle) regulation to minimize discharges to our water bodies and to make sure they are cleaned up. At the same time, few people would argue that we must not maintain an economic base to fund cleanups and environmental responsibility, and to pay taxes for education and all other aspects of modern society. If our sole goal as a society were to return our environment to a pristine state, we would shut down all waterfront industry; however, most people recognize that a balancing is required.

We are deeply concerned that the proposed changes to assumed fish consumption rates will create an imbalance, intended or unintended, that will result in a real and tangible reduction in water-dependent businesses and adversely affect Washington's economic vitality. In other words, the true cost of the changes to fish consumption rates may be much higher than most people expect. Meanwhile, the resultant environmental gain is likely to be theoretical and intangible, given that very few, if any, people actually consume fish at the assumed rates.

Through various complex formulas, the fish consumption rates drive clean up levels. Ecology has acknowledged that its risk-based calculations are very conservative and may already result in driving some clean up levels lower than natural background levels. The clean up levels will be reduced further under the proposed new rules. Cleaning up below natural background defies common sense. At the very least the regulations should establish a floor for sediment cleanup levels that provide a reasonably attainable cushion above natural background level for a given chemical constituent.

That we are currently experiencing a time of economic difficulty is no excuse to turn our back on the environment. However, it is an impetus to reassess the conservative and unrealistic assumptions on which the fish consumption rates are based, sharpen our pencils and spend our limited environmental restoration money where it is most effective. The proposed changes to the fish consumption rates are not an efficient use of limited resources and, more so, will be detrimental to economic vitality.

By way of precedent and example we point out the current issue with the City of Seattle/King County sewer overflow. There, we are looking at a \$1.2 billion cost to capture the "last drops" of overflow. Yet many studies have shown that the same money could do much more environmental good elsewhere. Even some prominent clean water advocates have recognized the law of diminishing returns – that we can no longer do it all and must make choices.

http://seattletimes.nwsourc.com/html/localnews/2017147361_cso03m.html

It is not too late to make the right choice in this case and leave the fish consumption rates unchanged, add a reasonable floor to sediment cleanup levels, and allow funding to be used better elsewhere.

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