



Technical Advisory Group

Community Advisory Board:

Community Coalition for
Environmental Justice

The Duwamish Tribe

Environmental Coalition
Of South Seattle

Georgetown Community
Council

IM-A-PAL Foundation

People for Puget Sound

Puget Soundkeeper
Alliance

South Park Neighborhood
Association

Washington Toxics
Coalition

Waste Action Project

*Working to ensure a
Duwamish River cleanup
that is accepted by and
benefits the community
and protects fish, wildlife
and human health.*

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January 18, 2012

Martha Hankins

Toxics Cleanup Program, NWRO

Washington State Department of Ecology

3190 160th Ave SE

Bellevue, WA 98008

Dear MS Hawkins:

The Duwamish River Cleanup Coalition/Technical Advisory Group (DRCC/TAG) was founded in 2005 by the member organizations of the Duwamish River Cleanup Coalition (DRCC), the Environmental Protection Agency's (EPA) Community Advisory Group (CAG) for the Lower Duwamish Waterway Superfund Site (the Site). DRCC/TAG provides technical support and public education, outreach and involvement services to the DRCC member organizations, the communities affected by the Superfund site, other Duwamish River stakeholders, and the general public.

DRCC/TAG has reviewed the proposed new fish consumption rates developed by the Washington State Department of Ecology and has the following comments.

Please do not hesitate to let us know if you have any questions about the attached comments.

Sincerely,

James Rasmussen

Coordinator

- DRCC/TAG agrees that the current default fish consumption rates do not reflect levels that the average population in WA State eats and certainly does not protect high fish consumers, such as Tribes, Asian/Pacific Islander and subsistence fishing families.
- Tribal and subsistence fishing communities are Environmental Justice populations that must be protected by the revised fish consumption rates.
- We endorse the decision by Department of Ecology to raise the Washington State fish consumption rates.
- We have reviewed the technical support document and think that it is, overall, a well crafted document. However, there are a few issues not fully addressed in the technical document that further support the proposed fish consumption rates, and possibly support consumption rates that are even higher than proposed:
 - As a result of Substitute Senate Bill 6197 and RCW 43.20.270, Governor Gregoire has initiated a State Policy Action Plan to eliminate health disparities in Washington State (<http://healthequity.wa.gov/>). One of the policy papers being issued in early 2012 addresses environmental exposures and hazards. Environmental exposures and hazards are not uniformly distributed across populations; low income communities and communities of color are at disproportionately high risk for environmental health disparities, including disease and death. One area of concern is the relatively new field of epigenetics – defined as changes that do not alter the DNA sequence but do cause biological changes in the body. Environmental exposures that may cause biological changes include endocrine disruptors, metals, benzene, polycyclic aromatic hydrocarbons, polychlorinated biphenyls, diet, and social influences such as stress. Ecology’s proposed fish consumption rates will help to protect low income, minority populations by supporting actions which reduce contaminant levels in seafood, which will ultimately reduce health disparities.
 - There are other populations in Washington State that consume large amounts of seafood that are not reflected in the document. Once the following new studies are conducted, supportable consumption rates may even be higher.
 - Colville Tribe fish consumption study (results pending in 2012).
 - The University of Washington School of Public Health, DRCC/TAG and Just Health Action will be conducting a survey of Duwamish River subsistence fishermen in 2012. Evidence collected from past surveys suggests that some

Duwamish fisher people eat fish daily and give or sell their extra catch to family members and neighbors.

- Anna Schmidt's 2011 MS thesis: *An Evaluation of Fish Consumption and Environmental Concern in Low Income and Food Insecure Populations in Seattle* reports that people who obtain food from food banks in Seattle are also high fish consumers.

The evidence from these and other pending studies should be evaluated and incorporated into the Washington State fish consumption rates as they become available. In the meantime, the proposed new fish consumption rates will provide a greater level of health protections for those who currently are disproportionately exposed to contaminant levels and associated health risks from local fish and seafood. Please do not delay on the new rates. Sooner is better in this case.

