



King County

Department of Natural Resources and Parks

Director's Office

King Street Center
201 South Jackson Street, Suite 700
Seattle, WA 98104-3855

October 18, 2012

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

Dear Ms. Dorrah:

Thank you for the opportunity to comment on the draft (version 2) of the *Fish Consumption Rate Technical Support Document*. The revised scope and purpose of the document are consistent with information communicated by Ecology Director Ted Sturdevant, and as described at a workshop the Department of Ecology (Ecology) held August 8 of this year. We reviewed the document, and appreciate Ecology's hard work assembling a great deal of technical information, as well as incorporating King County's comments on Version 1. We believe you have produced a robust technical resource.

Our technical staff have two comments which we believe will enhance the accessibility and usefulness of technical support document. First, we noticed that "Supplemental Information to Support the Fish Consumption Rates Technical Support Document" white papers are not actually appendices to the formal publication. In our own experience, technical white papers often get forgotten as time passes. To maintain a complete record of all of Ecology's efforts to compile this valuable information—and to minimize the risk of losing valuable background—we request that these white papers be made official appendices to the Document.

Second, Version 1 of the technical support document provided statistical distribution curves for the tribal and Asian-Pacific Islander consumption data. These figures made visualizing the changes in consumption rates across the various target populations easier to understand. Where the data are available to support the development of these curves, we would like them provided as they were in Version 1. We believe the figures foster a more complete understanding of the changes in fish consumption across low, medium and high consumers within the studied populations.

Once again, King County applauds your efforts to compile this large body of local, regional and national fish consumption information. We anticipate the document will serve as an important reference for understanding the fish consumption of all of Washington's citizens and

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inform the upcoming state rulemaking processes relating to sediment management and water quality.

As a large regional government, King County has a long history of environmental protection and strong interests in toxics reduction, and at the same time implements large wastewater and stormwater programs subject to these state rules. Being the only local government in Washington with a legislative responsibility to protect water quality, per RCW 35.58, we look forward to continuing to engage with Ecology on these various rulemaking processes, to assist in our mutual goal of developing workable approaches towards achieving cleaner sediment and water.

Again, thank you for the opportunity to comment. If you have any questions, please feel free to contact Dave White, Science and Technical Support Section Manager, in the Water and Land Resources Division of the Department of Natural Resources and Parks, at 206-296-8243.

Sincerely,



Christie True
Director

cc: Melissa Gildersleeve, Watersheds Coordinator, Department of Ecology
Jim Pendowski, Program Manager, Toxics Cleanup Program, Department of Ecology
Pam Elardo, Division Director, Wastewater Treatment Division, Department of Natural Resources and Parks (DNRP)
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