



## SQUAXIN ISLAND TRIBE

26 October 2012

Adrienne Dorrah  
Toxics Cleanup Program  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600  
[\[fishconsumption@ecy.wa.gov\]](mailto:fishconsumption@ecy.wa.gov)

RE: Comments on Version 2 of the Fish Consumption Rate Technical Support Document

Dear Ms Dorrah,

The Squaxin Island Tribe concurs fully with all the details the comment letter being submitted by the Northwest Indian Fisheries Commission to Director Sturdevant. In their summary, they state that the Technical Support Document has been stripped of important technical recommendations, in particular the recommended default range, which should be re-inserted.

Ecology's decision to issue another version of the document, and establish another round of review constitute unnecessary delay and harms high fish-consuming populations, including the Squaxin Island Tribe. In addition to the harm to public health and the perpetuation of environmental injustice, Squaxin Island has Treaty Rights to fisheries resources that are being damaged by Ecology's actions on an ongoing basis. Technical recommendations for an appropriate fish consumption rate, based on Tribal consumption throughout all of our usual and accustomed areas and for all consumed species, should be adopted immediately. As an interim measure, Ecology should move to adopt a default FCR in sediment management standards and water quality standards, at a level of at least 175 grams/day, as has been federally approved for Oregon.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Konovsky', written over a horizontal line.

John Konovsky  
Environmental Program Manager