



# Salmon Defense

PO Box 7431 · Olympia, WA 98507 · [salmondefense.org](http://salmondefense.org)

March 23, 2015

Maia Bellon, Director  
Washington Department of Ecology  
PO Box 47600  
Olympia, WA. 98504

ATTN: Cheryl Niemi, [swqs@ecy.wa.gov](mailto:swqs@ecy.wa.gov)

RE: Ecology's Draft Rule for Human Health Criteria (HHC) and implementation tools in Washington State's Water Quality Standards

Dear Director Bellon:

On behalf of Salmon Defense we are providing written comments on the Department of Ecology's (DOE) Draft Rule for Human Health Criteria (HHC) and implementation tools in Washington State's Water Quality Standards.

Salmon Defense is a non-profit organization with the mission to "protect and defend Pacific Northwest salmon and salmon habitat." Informed by an understanding and appreciation of traditional and contemporary knowledge and values of Native peoples, Salmon Defense values a healthy environment for all of the region's inhabitants now and in the future.

We are writing to express our concern regarding many of the provisions of the proposed rule for HHC and implementation tools in the Washington State water quality standards. We want to also clarify that we hereby, support, adopt, and incorporate by reference the complete Northwest Indian Fisheries Commission comments regarding the draft rule for Washington water quality standards, which were prepared on behalf and at the behest of its member tribes, including all materials, references and records, submitted to the Washington Department of Ecology on March 23rd, 2015.

We are aware that, over years of discussion on this topic, tribes have expressed particular interest in the adoption of a fish consumption rate that is more representative of the amount of fish consumed by tribal people, so as to better estimate their likely exposure to toxic pollution, and therefore protect their health, cultural values and resources. We wish to go on record to

document our support for more protective water quality standards, that protect the health and welfare of all of the people, salmon and waters of the state that are adversely effected by the allowance of toxics in our waterways. Revising the state’s water quality standards to include more protective human health criteria that is protective of children and high consuming populations is essential.

Fish consumption is a lifeway and elemental part of the nutrition and economies of many people and communities around the state. The current FCR in Washington of 6.5 grams/day assumes only one meal of fish per month. Many families and individuals eat fish multiple times per day. The Washington Department of Ecology has proposed a fish consumption rate of 175 g/day in the draft human health criteria—about one meal per day. Although this would be a step forward, when coupled with the other provisions in the rule, it still underestimates exposure to toxins and is far lower than the fish consumption rate that has been documented by tribal communities throughout Washington. Further, it is unconscionable to couple a revised fish consumption rate with an increased cancer risk level effectively manipulating the rule to maintain the status quo for many carcinogens.

We urge you to reconsider the rule as currently proposed, and create rules that that will require change and advancement from a pollution based economy to one of long-term sustainability and health.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Whitener, Jr.", with a stylized flourish at the end.

Robert Whitener, Jr.  
Chairman

*“Salmon are the icon of the Pacific Northwest for a reason. As creatures, dependent on all elements of the environment for their survival, they are a keystone species to the human race.”— Billy Frank Jr.*