



March 23, 2015

Cheryl Niemi  
Washington State Department of Ecology  
Water Quality Program  
PO Box 47600  
Olympia, WA 98504-7600

Transmitted by email to: [swqs@ecy.wa.gov](mailto:swqs@ecy.wa.gov)

**RE: Comments on Proposed Amendments to Chapter 173-201A WAC Water Quality Standards for Surface Waters of the State of Washington**

Dear Ms. Niemi:

Thank you for this opportunity to comment on proposed amendments to Chapter 173-201A WAC Water Quality Standards ("WQS") for surface waters of the State of Washington. I am writing on behalf of OneAmerica, Washington's largest immigrant advocacy organization.

We concur with the Seattle Human Rights Commission that the residents of Seattle and of Washington State have fundamental human rights to health and conditions that promote health. We are particularly concerned with communities of color and indigenous communities in the Puget Sound region that rely on the Sound for food, recreation and commerce. Many immigrant and refugee communities who call the Sound their home also rely on the fish they catch in the Sound to feed themselves and their families. High exposure to toxic chemicals in the Sound would disproportionately impact these communities, families and children.

Therefore we urge the State of Washington to adopt the following steps in the proposed rule:

1. Accept the proposed fish consumption rate of 175 g/day set forth in language proposed for the new WAC 173-201A-240(5)(b) so that residents of Washington may someday safely consume one fish meal a day from fish caught in Washington waters.
2. Reject the proposed tenfold increase in cancer risk level from one in a million ( $10^{-6}$ ) to one in 100,000 ( $10^{-5}$ ). The proposed tenfold increase in cancer risk level should be rejected and the existing, more protective cancer risk level should remain in place.

The proposed increase in the State fish consumption rate to 175 grams per day is a positive step. However, the proposed tenfold increase in the acceptable cancer risk level substantially undermines the goal of improved public health and creates serious health equity issue with respect to state residents of Native American, Asian, and Pacific Islander heritage.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Stolz', with a long horizontal flourish extending to the right.

Rich Stolz  
Executive Director  
OneAmerica