



OFFICE OF THE MAYOR

Ray Stephanson
Mayor

April 3, 2014

The Honorable Jay Inslee, Governor
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

RE: Washington's update to Human Health Water Quality Criteria –
"Fish consumption" standards

Dear Governor Inslee:

Everett's city and community leaders are aware that you and the Department of Ecology are on the verge of a decision on human health water quality standards and an associated increase in the fish consumption rate. Everett has been intimately involved in this issue, with staff participating in advisory committees that have informed your efforts. We are writing to urge that any human health standards and corresponding fish consumption rates be achievable, and be established in a way that does not pose extravagant compliance costs on manufacturers, wastewater treatment operators, and NPDES permit holders.

The policy choices you make for excess cancer risk rates and the fish consumption standard will have enormous implications for major manufacturers in our state, including those in the flagship aerospace sector. They also will have enormous implications for local governments who build and operate wastewater plants and go through the NPDES process – such as Everett. We fully support the state's responsibility to protect public health through updated water quality criteria, but it's critical this be balanced with the use of EPA guidance, with recognition of what is achievable, and with an approach that preserves jobs and economic vitality.

We join others in emphasizing that an incremental excess carcinogen risk level of $10e-6$ – which we are told you are evaluating – is unacceptable. This risk level and the resulting water quality standards will not be achievable and there are not even technologies on the market to make it feasible. Additionally, this risk level would carry with it a tremendous cost and compliance burden for industry and for local communities on the one hand, with very few meaningful, measurable benefits on the other. We cannot afford the economic and ratepayer consequences.

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We urge you to use a risk level closer to $10e-5$, with a set of well-defined compliance tools that are adopted along with the rule to make it achievable within established timelines. We have been informed that the EPA has published guidance noting that risk levels between $10e-4$ and $10e-6$ are acceptable policy choices.

Governor, please make sure the action you take is one that strikes a proper balance between environmental protection and economic and community preservation.

Sincerely,

A handwritten signature in black ink that reads "Ray Stephanson". The signature is written in a cursive, flowing style.

Ray Stephanson
Mayor

c: Everett City Council
Ted Sturdevant, Office of the Governor
Joby Shimomura, Office of the Governor
Brian Bonlender, Commerce
Maia Bellon, Ecology