

Denis Law
Mayor

City of
Renton



Mayor's Office

April 3, 2014

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

RECEIVED

APR 09 2014

Office of the Governor

RE: Washington's Update to Human Health Water Quality Criteria – Fish Consumption Standards

Dear Governor Inslee:

It is my understanding that you and the Department of Ecology may be very close to making a decision on human health water quality standards and an associated increase in the fish consumption rate. Renton has weighed in before on this issue, and wishes to again convey our strong concern that any human health standards and fish consumption rate be achievable, and that they be structured in a way that does not significantly undermine jobs or impose significant negative impact on NPDES permit holders such as our city.

As you know, the policy choices being considered for excess cancer risk rates and the fish consumption standard will have significant ramifications for both our major manufacturers as well as our NPDES permit holders. We all support the state's responsibility to protect public health through updated water quality criteria, but we believe this can be done in a way that strikes a balance with US EPA guidance, recognizes what is achievable for NPDES permit holders, and protects our jobs and economic growth in Washington state.

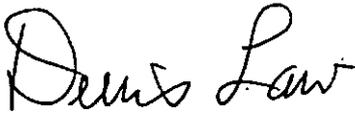
It is our understanding that you may be evaluating a human, health-based, water quality criterion that uses an incremental excess carcinogen risk level of $10e-6$. We join others in the local government and business sectors who believe this standard is unacceptable. This risk level and the resulting water quality standards will not be achievable, and there are not available technologies to even make it feasible. Further, we believe this risk level would carry with it exorbitant cost impacts both for industry and NPDES permit holders, with very little in the way of meaningful, measurable benefits.

The economic consequences, and the major burden this would put on ratepayers, would be a price we simply cannot afford to pay.

On behalf of Renton, I urge your help in utilizing a risk level of 10e-5, with a set of well-defined compliance tools that are adopted along with the rule to make it achievable within established timelines. As we understand it, the EPA has published guidance noting that risk levels between 10e-4 and 10e-6 are acceptable policy choices.

Please take action that appropriately balances the needs of our environment and our economy.

Sincerely,



Denis Law
Mayor

DL:aa

cc: Renton City Councilmembers
Jay Covington, Chief Administrative Officer
Gregg Zimmerman, Public Works Administrator
Chip Vincent, Community and Economic Development Administrator
Cliff Long, Economic Development Director
Lys Hornsby, P.E., Utilities Systems Director
Ronald Straka, P.E., Surface Water Utility Engineering Supervisor



Mayor's Office

1055 South Grady Way
Renton WA 98057-3232



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FIRST CLASS



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MAILED FROM ZIP CODE 98032

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