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THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

February 29, 2012

Governor Chris Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

RE: Fish Consumption Rates and Environmental Standards

Dear Governor Gregoire:

Recently the Washington Department of Ecology published a technical support document related to increasing fish consumption rates to a more realistic fish consumption rate for use in calculating toxic cleanup and water quality standards in Washington. The document has generated hundreds of responses from tribes, industries, municipalities, legislative representatives, and the general public.¹ The issue is very important to the Suquamish Tribe (Tribe) as the current fish consumption rate is considerably underestimated not only for tribal members but for most citizens in the State of Washington. The Tribe strongly supports increases to the fish consumption rate to increase the protection for human health for our tribal citizens and all citizens across the state.

Current water quality standards are based on a consumption rate of 6.5 grams of fish per day. This is less than one-half pound of fish and shellfish per person, per month or approximately one serving per month. Current cleanup standards are based on a consumption rate of 54 grams of fish per day, which is less than four pounds of fish and shellfish per person, per month. It is well documented that many tribal and non-tribal people in Washington regularly eat much large amounts of Washington fish and shellfish, and therefore, have a higher exposure to risks related to toxics in fish than the assumption for fish consumption that is currently used. Although the current rates are intended to reflect fish consumption by groups that consume large amounts of fish, including tribes, in order to protect public health, current information on actual fish consumption shows otherwise.

Instead of limiting the amount of fish people can eat because of pollution, the intent is to limit the amount of pollution so that people can safely eat fish. Fish consumption rates are set at levels that will protect most consumers of fish, and not just average consumers. We often set standards to protect the most vulnerable and most exposed of our citizens.

¹ <http://www.ecy.wa.gov/toxics/fish.html>

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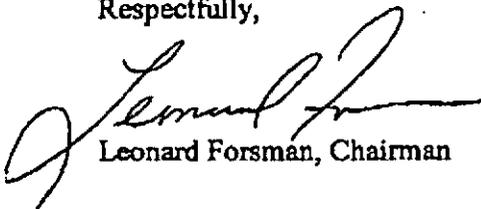
There appears to be a concerted effort at the current legislative session to delay or roll back environmental regulations and standards, and to oppose any new proposals. The proposed changes to fish consumption rates are not a new environmental proposal—tribes have been seeking a fish consumption rate that actually reflects what we eat for many years in order to protect the health of our citizens.

There is also substantial criticism of Ecology's effort because of some unsubstantiated concerns that accurate fish consumption rates will negatively affect the economy. These criticisms come from outdated thinking that the economy and environmental health are at odds. Clean land and water is essential for many economic activities, and increasing fish consumption advisories hurt tribal and non-tribal fishers, shellfish growers, and other important sectors of the Washington economy. Improved standards will ensure that our seafood remains the best in the world.

We view the technical support document and proposed rate by the Department of Ecology as a step in the right direction, even though it is not as protective as we would like. Ecology cites some studies conducted by tribes and tribal consortiums which have been peer reviewed by the EPA and the Oregon Department of Environmental Quality. After a substantial public process, Oregon adopted higher standards which were approved by the EPA. It is our hope that Washington can do at least as well to protect the health of citizens throughout the state.

As this process moves forward, the Tribe wishes to express its desire to remain engaged and provide meaningful input to you concerning this important issue. If you have any questions, please contact me at your convenience.

Respectfully,



Leonard Forsman, Chairman



THE SUQUAMISH TRIBE

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Office of the Governor

FACSIMILE COVER SHEET

Date: February 28, 2012

To: Governor Chris Gregoire

Fax: 360-753-4110

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FEB 29 2012

From: Melody Allen, Suquamish Tribal Attorney

Office of the Governor

Department: Legal

Pages including cover sheet: 3

() faxed by Neoma Bouré -ext. 8492

() faxed by Linda Tabafunda - ext.8491

() Hard Copy to Follow

Message:

Governor:

On behalf of Chairman Leonard Forsman, please find attached a letter in support of the Department of Ecology's technical support documents related to increasing the fish consumption rate.

IF TRANSMISSION IS UNREADABLE

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