

Talking Points: Stronger Water Quality Standards for Washington State

Further resources: <http://keepseafoodclean.org>

Comment Letter: <http://bit.ly/WAwaterquality>

- Water quality standards set levels of cleanliness for our waters and are a critical tool for reducing pollution and protecting public health.
- Washington has long had the weakest standards in the nation. Our current rule is based on 40-year-old data.
- The Department of Ecology presented an updated draft proposal in January that fails to significantly improve our weak, outdated standard. Our elected leaders have a responsibility to keep our water clean and our families healthy, and the changes they have proposed simply fall short.
- Water quality standards are partly based on Fish Consumption Rate, or FCR, a measure of how much fish people in our state eat on a daily basis. The EPA encourages states to consider their most sensitive populations when setting this number. Other factors considered when setting standards include allowable cancer risk, drinking water intake, and average body weight.
- Ecology's proposal raises the fish consumption rate in recognition that many Washington residents are heavy seafood consumers. But it also raises allowable cancer risk for Washington residents tenfold, from one in a million to one in a hundred thousand. Taken together, the increase in fish consumption rate and the increase in allowable cancer risk counterbalance each other, leaving allowed levels of many known cancer-causing toxic chemicals, including PCBs, mercury, and arsenic, exactly the same.
- This is not progress. There should be no allowance for more cancer in our communities. We are all exposed to toxins every day from a variety of sources, some outside our control. This is one source where the government has control, and they need to protect Washington citizens.
- This proposal gives polluters everything they want. Ecology's cost-benefit analysis found that the new rules would cost existing businesses nothing, because the minor changes to allowable toxics levels would not require anyone to update their water treatment systems.

- This is an environmental justice issue. We know from Ecology's own research that the groups with the highest fish consumption are tribal members, Asian-Pacific Islanders, and commercial and recreational fishermen. These sensitive populations cannot be considered as outliers. They have equal protection under the Clean Water Act, and therefore they must set the bar for how protective our new standards should be. This could be achieved by using the 175 grams/day FCR approved by the tribes WITHOUT also raising allowable cancer risk.
- For decades, we have had water quality standards that are the lowest in the nation. It's time now to make a positive change, and that doesn't come without an investment. Either we pay the up-front cost by investing in better water quality treatment, or we will pay in costs to our health, to our livelihoods, and to the richness of our local waterways.