

Feb 10, 2011 Paul Cumley

COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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Testimony for DEQ Hearing on Oregon's Revised Standards for Toxic Water Pollutants

Good afternoon. My name is Paul Lumley and I am a member of the Confederated Tribes and Bands of the Yakama Nation.

I am also the Executive Director of the Columbia River Inter-Tribal Fish Commission (CRITFC). I want to thank you for the opportunity to present our views on the proposal to revise water quality standards to protect human health.

CRITFC was created in 1977 by the Confederated Tribes and Bands of the Yakama Nation, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation and the Nez Perce Tribe. CRITFC provides fisheries technical services to its member tribes and also assists its member tribes in the development and implementation of salmon restoration strategies.

The tribes' and CRITFC's technical experts have identified key areas that must be addressed to conserve and restore the habitat and natural production and productivity of all salmon populations and stocks for the benefit of all peoples in the Pacific Northwest. One of these key areas is the water quality of surface waters in the Columbia River Basin. We believe the adoption of the proposed fish consumption rate of 175 grams per day is a critical first step in improving water quality in the Basin, as well as in protecting the health of our fish and our tribal members.

In 1990, CRITFC entered into a cooperative agreement with the EPA to conduct "A Fish Consumption Survey of the Umatilla, Nez Perce, Yakama, and Warm Springs Tribes of the Columbia River Basin." This survey examined the fish consumption rates and patterns of tribal members who reside in, catch and consume fish from the Columbia River Basin. This survey was regarded as the fish consumption "study most relevant to Oregon fish consumers" by DEQ's Human Health Focus Group in 2008. The Human Health Focus Group included Pacific Northwest scientists and regional experts with experience in the areas of toxicology, risk assessment, public health, biostatistics, and epidemiology.

This survey is an accurate measure of the fish consumption habits of tribal members. The survey reports that 97 percent of the people interviewed eat fish and 88 percent of the fish consumed by tribal members originated in the Columbia River Basin. This is significant because all of these

fish are affected by the quality of Oregon waters for all or part of their life cycle. The Fish Consumption survey conducted by our organization reveals that 95 percent of tribal members' health will be protected using a fish consumption rate of 175 grams per day and so it is a reasonable and protective value to use as the basis for Oregon's human health criteria. Other surveys reviewed by DEQ's Human Health Focus Group corroborate our findings and demonstrate that Asian and Pacific Islanders and Eastern European communities also consume fish at levels similar to Oregon Tribes.

We urge the DEQ to adopt the proposed fish consumption rate and revised water quality standards in order to clean up our waterways and protect the majority of people who eat fish.

Thank you.