



Association of Northwest Steelheaders

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Established 1960

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*Contributions to
The Association of
Northwest
Steelheaders
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*The Association is a
501(C)3 corporation.
91-1031100*

Oregon Department of Environmental Quality
Comments re: Toxic Rule Making
Sent Electronically
February 22, 2011

The Association of Northwest Steelheaders was founded in 1960 to protect fish and their habitats and support responsible sport fishing in Oregon, Washington, and Idaho. The Association has 1,200 active members and 10 chapters in rural communities along the Oregon Coast, the I-5 Corridor of the Willamette Valley, Central Oregon and metropolitan Portland.

The Association of Northwest Steelheaders supports the proposed revisions to Oregon's toxics water quality criteria. We believe strongly that Oregonians should be able to eat fish from our waters, and drink our waters, without fear of adverse health effects resulting from toxic pollutants. The documented effects of the listed toxins include cancer and disorders of the immune system, reproductive system, nervous system, and endocrine system. We support the basing of criteria on a consumption rate of 175 grams of fish per day, a rate approximately equal to the current rate of consumption by many tribal members.

Toxins should be regulated and limited regardless of source, whether industrial or municipal point discharge, or nonpoint sources including agriculture, forestry, and construction. Consequently, we support the proposed revisions of water quality standards and TMDL rules.

Thank you.

Ian Fergusson
Resources Director
Association of Northwest Steelheaders