



## COEUR D'ALENE TRIBE

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REFERENCE:

January 16, 2015

Paula Wilson  
Idaho Department of Environmental Quality State Office  
1410 N. Hilton  
Boise, ID 83706

RE: Human Health Water Quality Criteria – Risk Management and Protection of Public Health

Dear Ms. Wilson,

The Coeur d'Alene Tribe Lake Management Department would like to offer the following comments concerning Idaho Department of Environmental Quality (DEQ) recent discussion paper titled "Idaho Fish Consumption Rate and Human Health Quality Criteria-Discussion Paper #7". In this paper, the DEQ asserts that several key policy choices (concerning cancer risk levels as they relate to fish consumption rates) that have been present in the state's water quality criteria for more than 20 years be changed to less protective values. The Coeur d'Alene Tribe's Lake Management Department asks DEQ to reconsider this position and instead fulfill its mission to protect Idaho citizens from the adverse health impacts of pollution by not weakening Idaho's current cancer risk level criteria ( $10^{-6}$ ) and its default relative source contribution value.

As you know the Coeur d'Alene Tribe is also currently developing new fish consumption rates for its water quality standards and fully intends to use a cancer risk level no lower than  $10^{-6}$ . If Idaho were to utilize a lower risk rate, waters entering into the approved waters of the Coeur d'Alene Reservation and most importantly Coeur d'Alene Lake (in which the Tribe and State jointly regulate and manage, in part under the Lake Management Plan (2009) would potentially not meet our standards nor allow achievement of our designated beneficial uses. This same scenario would also occur where Idaho waters meet other Reservations and or adjacent state boundaries which utilize the  $10^{-6}$  risk rate.

The DEQ discussion paper also outlines other sources of cancer causing chemical exposure (air, food, genetics, etc.). This seems to be an apparent attempt to lend support to the notion of increasing the cancer risk values for water quality standards. While it is true that many factors play into the risks for development of cancer, we do not believe it is appropriate to use this notion to justify changes to water quality standards which will then result in more allowable carcinogens to enter the waters of Idaho and its neighboring states and tribes. Given these additional exposure pathways this informs us that while it may never be possible to control our exposure to all carcinogens, where possible we should always strive to reduce these exposures to minimum levels.

Finally we must comment that any changes in Idaho water quality standards for fish consumption will have their greatest effects on tribal members and those who live subsistence lifestyles. We must honor the past, current and future ability for our tribal members to safely subsist from the bounty of both the land and water.

Thank you for your attention to this matter.

Sincerely



Phillip J. Cerna  
Director, Lake Management Dept.  
Coeur d'Alene Tribe

cc:

Dennis McLerran, EPA Region 10 Administrator