



Environment

IDAHO COUNCIL ON INDUSTRY AND THE ENVIRONMENT

4-23-14

Paula Wilson
IDEQ State Office
Attorney General's Office
1410 N. Hilton
Boise, ID 83706

**RE: Docket No. 58-0102-1201 - Negotiated Rulemaking
Idaho's Fish Consumption Rate
Probabilistic Risk Assessment**

Dear Ms. Wilson:

Several of the members of ICIE's environmental committee have been participating in the negotiated rulemaking to establish Idaho's Fish Consumption Rate. ICIE's mission is to promote the use of facts and sound science in developing public policy on environmental issues. A final rule on Idaho's fish consumption rate will have a great economic impact on the State of Idaho. We support the IDEQ's work and efforts to provide the best Idaho based science in completing the review of Idaho's fish consumption and subsequent promulgation of new water quality standards.

At the meeting earlier this month, IDEQ had an excellent presentation on the assessment process, analyzing two different methods—deterministic method and the probabilistic (PRA) method. PRA method is technically sound and used in many research functions. It represents the best science in assessing risk, would represent all Idaho fish consumers, facilitates transparency in this rulemaking, and inherently calculates the risk to all Idahoans.

Dr. Paul Anderson presented this method at the April 2nd IDEQ Rulemaking meeting. We believe that this method offers the best avenue of determining risk and updating Idaho human health water quality criteria. PRA is the best available science, it assesses the risks of all Idahoans, avoids a "doubling down" of the inherent conservatism found in the Deterministic method. It also provides for transparency—everyone will be able to see the science and data collected and provide real input in to the policy decision making process. When IDEQ completes their fish survey work, the results can readily be seen for what they are, and then statistically combined to model the entire State. The output will be a distribution of fish

consumption that can then be developed for the entire state. This will lead to a more accurate picture of fish consumption and consequently the real risk. Once that is known, a more accurate HHWCQ standard can be implemented.

We urge the IDEQ team to select and use the Probabilistic Method for its efforts to update new water quality standards for Idaho. Thank you again for providing this opportunity for comment.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'N' followed by a horizontal line and a stylized 'S'.

Norm Semanko, Chairman
Environmental/Regulatory Affairs Committee
Idaho Council on Industry & Environment