



Environment

IDAHO COUNCIL ON INDUSTRY AND THE ENVIRONMENT

11-6-2015

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
Proposed Rule**

Dear Ms. Wilson:

The mission of the Idaho Council on Industry & Environment (ICIE) is to promote the use of facts and sound science in developing public policy on environmental issues. The final rule on Idaho's fish consumption rate can have a great economic impact on the State of Idaho. We applaud DEQ's efforts to include a wide variety of stakeholders in the effort to review and update Idaho's water quality standards. The use of the best Idaho-based science in completing the review of Idaho's fish consumption and subsequent promulgation of new water quality standards was vital because of the potential impacts on the citizens and the economy of the state.

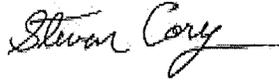
In previous comments, ICIE supported the use of the PRA method as technically sound and used in many research functions. It represents the best science in assessing risk, would represent all Idaho fish consumers, facilitates transparency in this rulemaking, and inherently calculates the risk to all Idahoans. We continue to do so.

There was a great deal of discussion about anadromous fish and Idaho's fresh water species. We support DEQ's decision to base the update of the rules on consumption of Idaho's fresh water species since our rules would have no impact on fish which spend most of their life cycle in the waters of other states and the ocean. The same logic applies to Idaho fish versus market fish.

Finally, the concept of "suppression" was thoroughly discussed and we support DEQ's decision not to include "heritage" or "suppression" rates. A review of the available information showed

that it had not gone through a rigorous scientific analysis. Use of such information is too speculative and is not required under the Clean Water Act.

Sincerely,

A handwritten signature in cursive script that reads "Steve Cory". The signature is written in black ink and includes a horizontal line extending to the right from the end of the name.

Steve Cory, President
Idaho Council on Industry & Environment