



Idaho Association of
Commerce & Industry
The Voice of Business in Idaho®

November 7, 2012

Ms. Paula Wilson
Idaho Dept. of Environmental Quality
1410 North Hilton
Boise, ID 83706

Dear Ms. Wilson:

The Idaho Association of Commerce & Industry (IACI) is the leading trade association of Idaho businesses and represents nearly three hundred companies engaged in diverse commercial and industrial enterprises throughout the State. We appreciate the opportunity to comment on the six fish consumption rate (FCR) studies identified by Idaho Department of Environmental Quality for further review (the "Listed Surveys"). The purpose of the FCR studies is to assist IDEQ in establishing statewide water quality standards with regard to toxic constituents. IACI has the following comments on these studies.

IACI believes any fish consumption study should evaluate fish consumption by the general Idaho population and relevant subpopulations. Using the FCR in setting statewide water quality standards also must adhere to legal requirements and policy considerations, but it is critical to begin with valid and supportable FCR values. The Listed Surveys do not adequately reflect consumption patterns for either Idaho's general population or specific subpopulations. Several recurring themes in these surveys suggest the data may not be appropriate for deriving FCRs for use in Idaho waters.

- With the exception of U.S. Environmental Protection Agency study, which is a national survey and, therefore, specific to neither Idaho nor the Northwest, these studies target specific subpopulations and are not applicable to the general population of Idaho. Moreover, none of the Listed Studies explains how, or under what circumstances, fish consumption by a specific subpopulation should be used to establish water quality standards for the general population. This subject should be addressed by any FCR study IDEQ and/or EPA undertakes for Idaho.
- Many of the Listed Studies include consumption of anadromous fish whose chemical concentrations likely do not reflect the concentration of chemicals in the water from which they are caught and to which Idaho water quality standards would be applied. Such studies should not be used to establish an FCR upon which to base Idaho water quality standards.
- Many of these studies report FCRs that include non-local sources of fish (e.g., not caught from the waters fished by the survey respondents) and do not provide the information needed to develop an FCR that represents consumption of locally caught, non-anadromous species. Again, such an approach would not be appropriate as a consideration in setting Idaho water quality standards. The FCR evaluation should categorize fish consumption in Idaho so as to distinguish between fish that have resided solely in Idaho waters, fish that were present in Idaho waters for only a portion of their life cycle, and fish that were never in Idaho waters. The Listed Studies do not achieve this.

- Several of the Listed Studies did not collect the information needed to extrapolate results of short recall surveys into long-term (lifetime) fish consumption rates as would be needed for water quality criteria designed to protect Idaho's population from long-term (i.e., chronic) exposures.
- Several of these surveys are more than 10 to 20 years old and may not represent current fish consumption patterns.

Specific comments for the studies include:

Columbia River Inter-Tribal Fish Commission – 1994. Data was pooled for four different tribes. The FCR may not reflect consumption patterns observed only in Idaho tribes.

Lummi Nation Seafood Study – 2012. This study was specifically targeted to represent high-end consumers within the Lummi Nation, which is a State of Washington tribe. Thus, it is not clear how the study would be reflective of high-end consumers in Idaho.

Suquamish Indian Tribe – 2000. This study specifically targeted another State of Washington tribe, which consumed both finfish and shellfish. Because Idaho has no marine environments, the inclusion of shellfish fisheries would not be reflective of consumption patterns in Idaho.

Asian and Pacific Islander Seafood Study – 1999. This subpopulation is not representative of Idaho demographics and the study did not distinguish between local harvested fish and commercially obtained fish.

EPA Estimated per Capita Study – 2002. This study derives an FCR based on national data rather than Idaho specific data.

Tulalip and Squaxin Island Tribes – 1996. Like several other studies, this subpopulation is not representative of Idaho demographics.

Our review shows that these studies are not adequate to establish or revise water quality standards for Idaho. These studies do not examine fish consumption habits for Idaho residents who consume fish obtained from Idaho's waters. They fail to distinguish between fish whose chemical concentrations derive from Idaho waters and those which gather concentrations solely, or largely, from foreign waters.

For all these reasons, and others beyond the scope of this brief overview, IACI supports the Department conducting an Idaho-specific fish consumption study.

Sincerely,



Alex LaBeau
President

cc: Alan Prouty, Chair, IACI Environment Committee