

# Policy Discussion #5

## Anadromous Fish

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# Today's Meeting

- Purpose – Discuss inclusion of anadromous fish in calculation of fish consumption rate
- Agenda –
  - Update on Idaho's survey
  - Update on Tribal surveys
  - Summary of comments on market vs all fish
  - Presentation on anadromous fish discussion paper
  - Discussion

# Idaho's FCR Survey Update

- 891 contacts made by end of June (does not include pre-test interviews)
- As of June 30, 8 twice-consumers
- Demographics
  - ~ equal # male/female
  - Slightly high in the 55+ age group
  - Low in the female 18-34 group
  - Responses in <\$25,000 group on target
- Angler population currently oversampled, will correct

# Idaho's FCR Survey Update

	PRETEST	APRIL	MAY	JUNE	TOTAL
# INTERVIEWS COMPLETED	130	110	375	406	1021
# AGREEING TO RE-CONTACT	56	71	240	232	599
% QUALIFIED AGREE TO RE-CONTACT	83.6%	76.3%	76.2%	73.4%	75.7%
COMPLETED RE-CONTACTS	34	39	141	66	280

# Idaho's FCR Survey Update

<b>FISH CONSUMPTION</b>	<b>APRIL</b>	<b>MAY</b>	<b>JUNE</b>	<b>TOTAL</b>
<b>PAST 12 MONTHS</b>	89 <sup>0</sup> %	87 <sup>0</sup> %	83 <sup>0</sup> %	85 <sup>0</sup> %
<b>PAST 30 DAYS</b>	72 <sup>0</sup> %	84 <sup>0</sup> %	79 <sup>0</sup> %	80 <sup>0</sup> %
<b>PAST 7 DAYS</b>	65 <sup>0</sup> %	65 <sup>0</sup> %	59 <sup>0</sup> %	62 <sup>0</sup> %
<b>YESTERDAY</b>	16 <sup>0</sup> %	13 <sup>0</sup> %	12 <sup>0</sup> %	13 <sup>0</sup> %

# Tribal Survey Update

# Summary of comments

# Anadromous Fish

# Policy decisions discussed to date:

- Inclusion of non-consumers
- General population or targeted
- Distributions or point estimates
- Inclusion of market fish
- Inclusion of anadromous fish

# Background

- Current EPA recommendations
  - 17.5 g/day general population, 142.4 g/day subsistence fisher population
  - Based on freshwater and estuarine fish only, not marine fish
  - Salmon estimated to be 94% marine origin, thus largely excluded from national recommendations
  - 2014 proposal ups general population consumption rate to 22 g/day, does not change subsistence rate

# Background

- However, EPA's 2000 guidance document sets a data hierarchy preference
  1. Use local/state data
  2. Use data reflecting similar geography/population
  3. Use data from national surveys
  4. Use EPA's default intake rates
- EPA also strongly recommends consideration of local studies of highly exposed population groups, such as Native Americans and Pacific-Asian Americans

# Anadromous Fish

- What are we talking about
  - Salmon
  - Steelhead
- Why is this important
  - Anadromous fish spend only a portion of their life cycle in Idaho waters
  - A majority of the contaminant burden is acquired outside of Idaho waters and regulatory control
  - Salmon 3<sup>rd</sup> most commonly consumed fish in US

# Anadromous Fish

- Identifying the issue – Inclusion of consumption of anadromous fish in calculation of fish consumption rate
- Potential solutions –
  - Include at full rate of consumption
  - Include at discounted rate of consumption
  - Do not include

# Reasons to include

- Idaho citizens generally enjoy catching and consuming anadromous species
- Inclusion provides a clearer picture of the overall fish consumption rate
- Salmon are central to the culture of most PNW Tribes and a major component of their diet

# Reasons not to include

- Majority of contaminants in anadromous fish come from marine waters
- Idaho WQS can't regulate pollution in marine waters
- “EPA recommends that data indicative of fresh/estuarine species only be used which is, by and large, most appropriate for developing AWQC.”

# Option 1: Include at full rate

- Why
  - Consistent with Oregon
  - More protective of human health
- Why not
  - Idaho WQS don't regulate marine waters
  - Impacts Idaho dischargers with small return
- Potential effects
  - Lower criteria values as compared to Option 2 (reduced rate) & Option 3 (exclude)
  - Changes possible to RSC

# Option 2: Include at reduced rate

- Why
  - Recognizes that marine fish are part of the diet
  - Recognizes that Idaho WQS can't regulate marine waters
- Why not
  - Idaho WQS can't regulate marine waters
  - What formula for reduction is right?
- Potential effects
  - Lower criteria as compared to Option 3
  - May be able to adjust RSC

# Option 3: Do not include

- Why
  - Idaho WQS can't regulate marine waters
  - Consistent with EPA's approach for national fish consumption rates
- Why not
  - May have a more difficult time during approval
  - Not consistent with Oregon's approach (CRITFC)
- Potential effects
  - Retain RSC default values

# WQ Criteria Factors

- Calculating fish consumption rate
  - Including non-consumers in calculation
  - General population vs targeted subpopulation
  - Distribution vs point estimates
  - Including market fish in calculation
  - Including anadromous fish in calculation
  - Percentile of distribution protected
- Level of protection (aka risk)

# Implementation

- Where the fish meet the water...
  - Higher fish consumption rates may lead to decreased water quality criteria
  - Difficulty in measuring ambient water quality concentrations at criteria levels
  - Estimating the overall net impact to contamination in local fish from lower criteria
  - Legacy sources

# Thank you

Comments accepted through August 22, 2014