



Environment

IDAHO COUNCIL ON INDUSTRY AND THE ENVIRONMENT

August 22, 2014

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho

Dear Paula:

Following are ICIE's comments on Discussion Paper #5.

A study done in the mid-1990s found that "salmon, steelhead trout, smelt and rainbow trout had the lowest levels of chemical contaminants, so the risks from consuming these fish were lower than the risks from consuming species which had higher levels of contamination, such as white sturgeon, large-scale sucker, and mountain whitefish.

"The chemical concentrations in fish were generally lower than levels reported in the literature from the early 1970's and similar to levels reported in the late 1980's."

<https://www.google.com/#q=Columbia+River+basin+fish+contaminant+Study>

This study from 2002 reached the same conclusion. "The concentrations of organic chemicals in the salmonids (chinook and coho salmon, rainbow and steelhead trout) were lower than any other species. The concentrations of organic chemicals in three fish species (white sturgeon, mountain whitefish, large-scale sucker) were higher than any other species."

http://www.hanfordchallenge.org/cmsAdmin/uploads/2002_EPA_Columbia_Fish_Contaminant_Survey.pdf

Another study done in 2009 focused on the relationship between contamination of fish in Puget Sound. "...because the Puget Sound basin provides a broad range of habitats from deep marine waters to high-mountain lakes, many species can complete their entire life cycle within its waters, including highly migratory species such as coho and Chinook salmon. Chinook salmon that remain as residents and mature in Puget Sound experience a three-to five-fold exposure to some contaminants compared to others that migrate and grow to adulthood in the Pacific Ocean.

http://wdfw.wa.gov/conservation/research/projects/marine_toxics

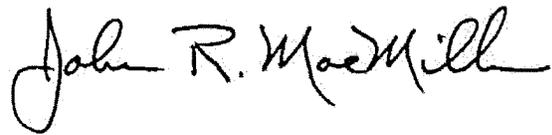
As part of a recent proposed update which was announced in May, 2014, EPA states that salmon are a marine fish, meaning that they spend the 3-4 years in a marine environment—estuaries and ocean.

Idaho's anadromous fish may be spawned in Idaho waters but they spend only a relatively short time in Idaho waters. More than one study found that contamination was highest in the marine environment such as estuaries and Puget Sound as well as the ocean.

After reviewing the previous studies and some of the studies listed as references in the document, the Idaho Council on Industry & Environment and its Environment/Regulatory Affairs Committee recommends that anadromous fish not be included as outlined in Option 3. There is no scientific justification for including salmonids in determining fish toxics criteria for Idaho. Idaho has no control over the pollution in the estuary and ocean environments where the fish spend the majority of their life cycle. More rigorous water quality standards for Idaho would be a burden on the citizens of Idaho and would not contribute to better health of those who consume fish.



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



Randy MacMillan
President
Idaho Council on Industry & Environment