

November 1, 2013

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: Negotiated Rulemaking - WQS/Fish Consumption Rates in Human Health Criteria, Docket No. 58-0102-1201

Dear Ms. Wilson,

Northwest Food Processors Association serves as the voice of the food processing industry in the Northwest, representing 450 member companies including over 100 food processors with nearly 200 production facilities throughout the region. It is our understanding the goal of the survey currently being designed by Boise State University in conjunction with the Idaho Department of Environmental Quality (IDEQ) is to collect information about the range of long-term fish consumption habits of Idaho residents including the sources and frequency of fish being consumed, in order to use that data to update water quality criteria and standards.

We commend the State of Idaho and IDEQ for understanding the importance of developing protective water quality standards (WQS) and obtaining Idaho-specific fish consumption rates by conducting a telephone survey to Idaho citizens. However, we feel the current survey design is overly complicated, which could result in the validity of the research being questioned. A telephone survey design with the questions asked for this research serves little purpose as an adequate tool for the issues being examined. The United States Environmental Protection Agency (USEPA 1992) recommends that telephone interviews only be used as a follow-up to collecting information, that the number of questions be limited, and that combined mail/telephone techniques be used to provide questions, visual aids and other information before interviews are conducted. Many people do not have land line phones and the use of "caller ID" enables people to easily screen or avoid survey calls, thus further skewing the population sample and results of this research.

One other issue that continues to raise concern is the collection of information on other sources of fish or seafood; those sources that are not wild caught in Idaho waters. The ultimate purpose of this effort is to update Idaho water quality criteria and standards. Therefore, we would echo the concerns previously expressed by others on this point, that data collection should not be tainted by collection of data on fish that comes from markets, restaurants or brought in from other states, from other water bodies outside of Idaho.

Finally, we would also raise concerns that the scope of the survey is too lengthy for being administered by telephone to produce accurate results and the survey design will not adequately correlate the two populations it is intended to measure. It is important for the IDEQ to carefully review both the survey and sampling design to ensure the results of this research are valid for determining the use of the information. NWFP stands behind the importance of WQS but we are concerned about the prospect of following other states down the path of creating unattainable standards based on questionable survey results.

Sincerely,



David McGiverin
Director, Environmental Affairs