

Human Health Criteria – Fish Consumption Rates

Policy Discussion # 7
Risk Management
and

Protection of Human Health

The background of the slide features several concentric, light blue circular ripples that resemble water droplets hitting a surface. These ripples are scattered across the lower half of the slide, with a larger one in the bottom right and several smaller ones towards the bottom center and left.

Today's Meeting

- Purpose – Discuss risk management and protection of human health
- Agenda –
 - Update on Idaho's survey
 - Update on Tribal surveys
 - Summary of comments on suppression of fish consumption
 - Presentation on risk management and protection of human health
 - Discussion

Idaho Fish Consumption Survey Update

Don A. Essig, DEQ



Idaho's FCR Survey

Through Oct. 30th, 2014

- 2,509 interviews completed
- 25 “twice-consumers”

Fish Eaten	April-June	July-Sept	Total
Past 12 months	85%	87%	87%
Past 30 days	71%	70%	71%
Past 7 days	44%	44%	44%
Yesterday	13%	12%	12%

Idaho's FCR Survey Update

➤ Demographic Quotas

- So far have 51.4% females & 48.6% males
- Income also on track
- Non-angler / angler proportion continues to improve
- Low on Hispanics, but improving
- Geographic breakdown close to expectations
- Meeting age quotas continues to be difficult, but has much improved

Adjustments to Idaho's Survey

- Using general population survey to get anglers
- Continuing with greater use of cell phone than landline in order to help meet age quotas
- Geographic breakdown and Hispanic representation now biggest departures

Tribal Survey Update

Lon Kissinger, EPA Region 10



Summary of Comments Suppression

Don A. Essig, DEQ



Received 9 Comment Letters

1. Upper Snake River Tribes Foundation (USRT)
2. Idaho Conservation League (ICL)
3. JR Simplot Company (Simplot)
4. Idaho Association of Commerce and Industry (IACI)
5. Nez Perce Tribe (NPT)
6. Idahoans for Sensible Water Regulation (ISWR)
7. Idaho Power Company (IPC)
8. Environmental Protection Agency, Region 10 (EPA)
9. Clearwater Paper (CP)

Question DEQ Was Asking

- How should Idaho consider suppression in its choice of a regulatory fish consumption rate for revision of human health criteria
 1. Base choice of regulatory FCR on a estimate of historic consumption rate(s)
 2. Base choice of regulatory FCR on estimates of current rate(s)
 3. Integrate the two?

Reasons for Basing FCR on Suppression

1. Better health protection;
2. Avoid downward spiral in fish consumption;
3. Environmental justice and tribal treaty rights;
4. Correct declining trend in fish populations

Reasons for NOT Basing FCR on Suppression

1. Current consumption advisories rather limited;
2. No historic data, estimates of historic rates not rigorous, unscientific, not comparable;
3. Would be contrary to section 107(D) of Idaho's Environmental Protection and Health Act;
4. Would result in criteria that are not workable, achievable, provide benefit

Thank You

Comments on today's policy
discussion will be accepted
through

January 12, 2015

