Response to Comments
July 31, 2013
FCR Negotiated Rulemaking
Target Populations

• The planned Idaho fish consumption survey has two target populations

  1. **The general population** – this is every adult that lives in Idaho

  2. **Resident recreational anglers** – this is every adult with a resident fishing license
Type of Survey

• Idaho plans to combine two types of survey:

  1. **Dietary recall** – how much fish did you eat recently?

    AND

  2. **Frequency of fish consumption** – how often do you eat fish, or did you eat fish in the past ... year?
Data we want/need

• Rate of consumption of fish; grams /day
• For the target populations
• This is a distribution, i.e. not everyone eats the same amount of fish
• We have not chosen the statistic that will be used for regulation
• For planning purposes, we are using uncertainty about the mean to describe uncertainty in our data
Source of fish

• All sources with breakdown by:
  – Market or wild caught
  – For wild caught
    • Resident or anadromous

• Further detail uncertain

• To be discussed in more detail later in our rulemaking
Tribal Surveys

• Questions about Tribal surveys are best directed to EPA or the tribes

• DEQ has committed to working with the tribes, so as to assure legitimate comparison of our independent survey results

• We will consider results of both the surveys we conduct and the tribal surveys in choosing a fish consumption rate for Idaho criteria
Resources

• We have a lot of human resources
• We have read a lot of reference material
• We have been following the WA process
• We are limited in funding and time
UNDERSTANDING SOME TERMS WE’VE BEEN USING
Target Population – who we want to sample

vs

Sample Frame – who we are able to sample
Survey Instrument – what we ask, the questionnaire

VS

Survey Method – how we ask
Usual intake – one person’s consumption rate

vs

Population distribution – everyone’s consumption rate
Low consumer

VS

High consumer
That’s All for Now
Why a general population survey?

• Because we have an obligation to all Idahoans

• To provide context

“If a State or Tribe chooses values (whether the central tendency or high-end values) from studies that particularly target high-end consumers, these values should be compared to high-end fish intake rates for the general population to make sure that the high-end consumers within the general population would be protected by the chosen intake rates.” EPA, 2000

• To better define and communicate level of protection