



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