

1. Great job describing the issues. The additional material on the CDI is very helpful.
2. Your reasoning for not using the National CSFII data could be more detailed.
3. Are Lon K & Leslie K comfortable with referencing their draft paper?

Executive summary

- Before introducing the issue of salmon it is important to add a discussion of anadromous, marine, estuarine, and fresh water species.
- Define “high fish consumers” This is a value statement that should either be defined by ecology or based on definitions in the surveys you reviewed. See specific comment no. 6.
- Define “statewide default” fish consumption rates. Does this refer to specific laws, actions, advisories, etc. It would be helpful to declare in the Executive summary what policies, programs; rules may be affected by this “default” rate.
- Pg. 7 “...those individuals that eat a lot of fish...”
What does “a lot” mean?

Chapter 1.

1. Pg 9. “US EPA in the 1980’s”. You should include the actual references.
2. Pg 9-10 Key considerations “Treaty-reserved fishing rights”. You should include this list of bullets in the Executive Summary. In particular there is no discussion of treaty rights in the executive summary.

Chapter 2

3. You use different terms for fish & shellfish. You may need to clarify your groupings at some point groupings by anatomy eg finfish & shellfish and groupings by habitat eg anadromous, marine, etc. You mention eggs here but I am not sure if you discuss them further in the document.
4. Pg 16. “See Appendix B for information on fish & shellfish species harvested...” There information is not in Appendix B.
5. Pg 17. Define your geographic boundaries “lower south sound”, etc
6. Pg 17. “Salmon is not considered in many risk assessments...” Be more specific MTCA, EPA, can you give references?
7. Pg 23. Do you have more information on the DOW report. The methodology is not clear nor is the size of the population surveyed.
8. Pg. 24 “... high fish consumers are...” This should be included in the Executive Summary.
9. Pg 24. Footnote 29 on pg 25 should be included with this paragraph. However, later in the report you discount the use of only fish consumer data because of the method of data collection.

10. Pg 25. Need more information on Table 6. Where does 28% come from, etc
11. Pg 28. Footnote 49 “National fish consumption studies are typically carried out over a broad...” What studies are you referring to? The USDA study? I think this is a very important and potentially controversial statement. It should be more than a footnote.
12. Pg 29. “Ecology concludes....significant amount likely coming from local sources.” Do you have a reference for this statement or evidence to support this?

Chapter 3

13. Pg 39. Define “subpopulation”
14. Pg. 42 What about the value of qualitative vs quantitative surveys.
15. Pg 45 “Most fish dietary surveys...” This is a rather broad statement. Do you mean the surveys you reviewed or all surveys for all places beyond the PNW?
16. Pg. 45 “using independent statisticians...may circumvent..” Are you suggesting this is OK?

Chapter 4

17. Pg 48. Your reason for eliminating the Harper & Harris reports needs to be expanded. .
18. Pg 49. “It is possible that tribal elders ...were omitted...” Do you have evidence of this or is this simply your observation from reviewing the report?
19. Pg 51. I am somewhat confused. You describe an elegant list of design criteria, yet you don’t use them to evaluate the appropriateness of the reports. Were the design criteria from Ellen Ebert on Pg 40 simply for illustration purposes?
20. Pg 51. Note that the CRITFC survey did not include body weight. It is a limitation of the data comparisons that you purpose in your CDI.
21. Pg 60. Lon did a lot of extrapolation of the API data. I think this should be noted as a weakness of the data; particularly when including it in the CDI
22. Pg 65. “...using a consumption rate derived from a low percentile of the consumption distribution would not accurately estimate contaminant exposure...: This is a particularly important point. You use the consumer only population from the USDA national survey to characterize the proportion of high fish consumers in Washington, right? Does this mean it is not “an accurate estimate”. Also, the Native American and Pacific Islander surveys are only representative of a small proportion of the Washington population. Are the consumption rates derived from these populations an “accurate estimate” of the Washington consumers?
23. Pg 69. Does EPA 2001 include a discussion the CSFII methodology? The CSFII was an USDA study not an EPA survey.