State of California Regional Water Quality Control Board San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT

October 11, 2017

ITEM: 9

SUBJECT: Informational Item: Presentation of an Alternative Analysis of

Fish Consumption Data from San Diego Bay (*Tom Alo*)

PURPOSE: To present a stakeholder's alternative analysis of the

Southern California Coastal Water Research Project's San

Diego Bay fish consumption study data.

RECOMMENDATION: This is an informational item only; no action will be taken by

the Board at today's meeting.

KEY ISSUES: The study identifies the key demographic and economic

groups consuming fish from San Diego Bay (Figure 1) and

identifies their consumption rates.

San Diego Bay-specific consumption rates will reduce some

of the uncertainty associated with Human Health Risk Assessments for people consuming fish caught in the bay.

Human health risk assessments are used by staff to

evaluate compliance with sediment quality objectives, and to establish sediment cleanup goals and TMDL numeric targets for pollutants that bioaccumulate from sediment into fish

consumed by anglers and their families.

PRACTICAL VISION: Consistent with the mission of the Monitoring and

Assessment chapter of the Practical Vision, the goals of this study are to provide essential information necessary to (1) assess risk to people eating fish caught from San Diego Bay,

and (2) inform the development of cleanup goals for contaminated sediment and numeric targets for TMDLs to

protect human health.

DISCUSSION: At the April 12, 2017 Board meeting, Mr. Mark Russell

(Russell Environmental Group, on behalf of General Dynamics) and Mr. Ben Gibson (Latham & Watkins)

provided comments on the San Diego Bay fish consumption study findings (Item No. 7). The study was conducted by the EOSR Item 9 October 11, 2017

Southern California Coastal Water Research Project (SCCWRP) under contract with the State Water Board, and with additional funding from the City of San Diego and San Diego Unified Port District. The final study report (Report) was published on the SCCWRP website at the end of March 2017.

Mr. Russell stated that he found several issues that should have been corrected in the final report:

- Missing Data;
- Discrepancy between the report and the data file; and
- Inconsistency in use of datasets.

Mr. Gibson stated that the data could not support the fish consumption rates.

Chair Abarbanel invited Mr. Russell and Mr. Gibson to reevaluate the dataset and conduct an alternative analysis. Mr. Russell has done so and will present his alternative analysis at this Board meeting.

Since the April Board meeting, San Diego Water Board staff met with Mr. Russell to better understand his specific concerns regarding the Report. Based on that discussion, SCCWRP made the following revisions to the Report:

- Sample sizes (N values) were added to all figures, where applicable;
- Site C North Harbor Drive was removed from the figures because no anglers were interviewed in that area; and
- Text was added or expanded to provide clarity on the (1) variable sample sizes, (2) portion sizes consumed by anglers, family, and friends, (3) accuracy of the GPS locations of the interviews, and (4) estimated consumption rates for children.

SCCWRP's revisions to the Report did not change the results and conclusions of the report.

LEGAL CONCERNS: None.

SUPPORTING DOCUMENTS:

1. Figure 1 – Map of San Diego Bay

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This item was publicly noticed in the Meeting Notice and Agenda for the October 11, 2017 meeting. PUBLIC NOTICE: