State of California Regional Water Quality Control Board San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT

June 21, 2017

ITEM: 12

SUBJECT: Information 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 information 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 (Supporting Document No. 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. The study was conducted by the Southern

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

Based on these comments, Chairman Abarbanel invited Mr. Russell and Mr. Ben Gibson to reevaluate the dataset and conduct an alternative analysis. Mr. Russell has done so and will present the findings of the alternative analysis at the June meeting.

LEGAL CONCERNS: None.

SUPPORTING DOCUMENT:

1. Figure 1 – Map of San Diego Bay

PUBLIC NOTICE: This item was publicly noticed in the Meeting Notice and

Agenda for the June 21, 2017 meeting.