

DESIGN OF A SURVEY ON FISH CONSUMPTION BY THE SHOSHONE-BANNOCK TRIBES

Prepared for
The Shoshone-Bannock Tribes
The U.S. Environmental Protection Agency
SRA International, Inc.

Prepared by
The Mountain-Whisper-Light Statistics and RIDOLFI Inc.

Prepared under
EPA Contract EP W09 011 Task Order 125

February 2014

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EXECUTIVE SUMMARY

Survey Purpose and Approach

The Tribal Governments in the State of Idaho are collaborating with the U.S. Environmental Protection Agency (EPA) Region 10, the State of Idaho, and other stakeholders to develop methods for gathering data on fish consumption rates (FCRs), which includes all freshwater and marine finfish and shellfish. A survey is being designed to obtain data necessary for determining fish consumption rates for the Tribes in Idaho, exploring both current and heritage rates. An additional objective of the survey is to determine how current fish consumption rates might increase if fisheries resources are improved. This information will be useful for developing water quality standards that are protective of the current and future health of the Tribes and of other Idaho residents. Water quality is of great importance to the Native American Tribes in Idaho, since a substantial portion of their diet is derived from aquatic sources, and water and aquatic resources play an important cultural and spiritual role for them. It has been documented elsewhere in the Pacific Northwest (e.g., Puget Sound and the Columbia River) that Tribes consume far more fish and shellfish than the general U.S. population. In addition, reported historic fish consumption rates are very high. EPA is therefore interested in investigating FCRs for Idaho Tribes to support development of Tribal ambient water quality criteria (AWQC) to protect high fish consuming populations.

Development of the survey design involved informational visits to the Idaho Tribes, including an open exchange of interests, concerns, and ideas; collection of relevant information on culture, history, fisheries, environment, and Tribal objectives; investigation of statistical methods and issues; development of an appropriate statistical methodology for the current fish consumption survey and an approach for documentation of heritage rates; preparation of a multi-part survey questionnaire, including screening, two 24-hour dietary recalls, and food frequency questionnaire; calculations to support a statistically valid design; and coordination with involved agencies, tribes, consortia, and consultants. This report describes the proposed survey design for the Shoshone-Bannock Tribes (Sho-Ban) of the Fort Hall Reservation.

Current Survey and Historic Assessment

There are three eras of importance for a fish consumption study: the past, present, and future. Over an extended period of time, the Tribes have experienced environmental and social changes that have reduced fish abundance, access to fish, safety of fish consumption, and fish consumption itself. The Tribes are seeking to increase fish

availability, fish safety (i.e., free from contamination), and fish consumption in the future. Thus, current consumption rates do not reflect the Tribe's past nor its future goals. Assessing consumption through a current, cross-sectional survey will provide relatively precise information about current consumption only. For the overall goals of this survey project, the current consumption rates should not be considered in isolation. Assessing past consumption through an assessment of historical materials and, potentially, interviews with some older individuals whose history reaches back a long lifetime may be highly informative, but rates so derived are likely not as precise because they involve longer-term recall and unknown quality and completeness of past documentation.

Since the results of the survey may be used for water quality regulation, it is intended that rates and ancillary materials will support that use. The strength of the current rates is the methodology and the ability to compare them to contemporary rates for other populations. The strength of the historical rates is their relevance to the goals of the Tribe, which is to restore fish consumption to past, higher levels. Future rates may be projected based on anticipated increases in fish populations resulting from planned or ongoing habitat restoration and supplementation efforts, and associated increases in fish consumption.

The survey design includes a description of the Shoshone-Bannock Tribes' story about suppression, based primarily on existing literature and supplemented with input directly from the Tribes. Historical fish harvest and fish consumption by Tribal members is presented, as well as causes of decline in the fish populations, and goals for the future. Additional research and discussion with Tribal representatives and experts will take place to implement the survey design. During the survey implementation phase, a more in-depth study of suppression will take place and its implications for future fish consumption will be considered.

Suppression Effects and Their Implications

According to the National Environmental Justice Advisory Council (NEJAC), a "suppression effect" occurs when a fish consumption rate for a given population, group, or tribe reflects a current level of consumption that is artificially diminished from an appropriate baseline level of consumption for that population, group, or tribe. The baseline level of consumption is suppressed, and cannot be characterized via a survey of current consumption.

There are circumstances in which suppression effects have implications for an environmental justice policy that seeks to sustain healthy aquatic ecosystems and to protect the health and safety of people consuming fish, shellfish, aquatic plants, and wildlife for subsistence, traditional, cultural, or spiritual purposes. First, a suppression effect may arise when an aquatic environment and the fish it supports have become contaminated to the point that humans refrain from consuming fish caught from particular waters. Were the fish not contaminated, these people would consume fish at more robust baseline levels. Second, a suppression effect may arise when fish upon which humans rely are no longer available in historical quantities (and kinds), such that humans are unable to catch and consume as much fish as they had or would. Such depleted fisheries may result from a variety of affronts, including an aquatic environment that is contaminated, altered (due, among other things, to the presence of dams), overdrawn, and/or overfished. Were the fish not depleted, these people would consume fish at more robust baseline levels. Third, a suppression effect may occur from loss of access to fisheries resources and changes in social structure such that individuals no longer harvest fish to the same extent as before, or do not harvest at all.

When environmental agencies employ a FCR that does not capture fully the consumption that is suppressed – under any scenario in which suppression effects occur – they may set in motion a sort of downward spiral whereby the resulting environmental standards permit further and further contamination or depletion of the fish and so diminished health and safety of people consuming fish, shellfish, aquatic plants, and wildlife for subsistence, traditional, cultural, or spiritual purposes. This survey is intended to develop the most precise FCRs possible while taking into consideration historical rates as they relate to restored future rates. An approach is presented for determining the Tribe's heritage rates based on a critical evaluation of existing historical literature.

Survey Design and Questionnaire

The target population for the current survey is adult (18+) enrolled Shoshone-Bannock Tribal members, a population which will be geographically defined (e.g., by zip codes within the reservation and within a reasonable travel distance of the reservation). Sampling will occur with the use of stratification; strata will be defined by the combination of age, gender, and frequency of consumption (determined through an initial phone screening process). Potential respondents will be selected randomly from each stratum and this screening list will include 3 to 5 times as many individuals as the

ultimate effective sample size,¹ which was statistically derived to achieve acceptably precise rates and support the use of modern survey methodology based on 24-hour dietary recall interviews. The proposed sample size is expected, conservatively, to provide an estimated mean consumption rate (all species combined, calculated from responses to the food frequency questionnaire) that has 95% probability of falling within 25% of the population mean, and to provide an estimated 95th percentile of consumption that has 95% probability of falling within 40% of the population 95th percentile of consumption.

Trained Tribal representatives will conduct in-person interviews. Each individual surveyed will complete a food frequency questionnaire and a 24-hour dietary recall interview focused on fish consumption behavior. A subsample of individuals will subsequently be contacted by phone for a second 24-hour recall interview after several days. The food frequency questionnaire will ascertain species-specific frequency of consumption, typical quantities consumed by fish-eating period, sources of fish consumed, and preparation methods. Portion size characterization will be facilitated through use of models. Species identification will be facilitated by use of photographs. Hard copy and electronic data will be handled under strict confidentiality and quality assurance/quality control protocols.

In addition to the approach presented for critically reviewing existing literature to determine the Tribe's heritage rates and future aspirations for consumption, the survey questionnaire will include qualitative questions related to changes in fish consumption over time. The survey questionnaire presented to respondents during the in-person interviews will include questions related to changes in fish consumption and fishing activities compared to the past, reasons for changed fish consumption, and future consumption goals. These inquiries will provide additional lines of evidence regarding heritage rates.

Survey Data Analysis and Reporting

In addition to data collection activities, the survey design includes a description of methods for data management, confidentiality, analysis, and reporting. The results of the suppression study for each Tribe (including fish consumption rates and supporting materials) will be presented in a final report along with the results of the current consumption survey. Reported fish consumption rates from the implementation of the

¹ See subsections "FFQ Sample Size" and "24-Hour Dietary Recall Sample size" for details on sample size methodology.

current consumption survey will include the mean (average) and various percentiles of consumption up to the 95th percentile—and beyond, if warranted. The precision (margin-of-error) for certain rates (e.g., mean, median, 90th and 95th percentiles) will also be presented. Rates based on the food frequency questionnaire will be presented for population sub-groups defined by age, gender, and other characteristics in grams per day (and for some analyses, in grams per kilogram of body weight per day). Rates for fish species groups (e.g., anadromous, resident freshwater, and marine species) will also be presented. Data from the 24-hour recalls will be used (and assessed by the ‘NCI method’ where possible) to provide rates for all species combined and, if supported by the data, for population sub-groups and for some species groups. The report of findings will include a description of the survey operations performed and statistical analyses, results of both the current survey and heritage rate study, a discussion of the data, including a comparison of the fish consumption rates derived from both the FFQ and the 24-hr recall surveys, and supporting materials.

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LIST OF ABBREVIATIONS AND ACRONYMS

AWQC	ambient water quality criteria
CDC	Center for Disease Control and Prevention
CV	Curriculum vitae
CWA	Clean Water Act
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FCR	fish consumption rate
FFQ	food frequency questionnaire
FOIA	Freedom of Information Act
HSRRO	Human Subjects Research Review Official
IRB	Institutional Review Board
NCI	National Cancer Institute
NEJAC	National Environmental Justice Advisory Council
NHANES	National Health and Nutrition Examination Survey
NPDES	National Pollutant Discharge Elimination System
PHI	Protected Health Information
PI	Principal Investigator
PII	Personally Identifiable Information
SFTP	Secure File Transfer Protocol
Sho-Ban	Shoshone-Bannock Tribes
USDA	U.S. Department of Agriculture

LIST OF UNITS

g/day	grams per day
g/kg-day	grams per kilogram of body weight per day

1.0 INTRODUCTION AND BACKGROUND

The Tribal Governments in the State of Idaho are collaborating with the U.S. Environmental Protection Agency (EPA) Region 10, the State of Idaho, and other stakeholders to develop methods for gathering data on fish consumption rates (FCRs) in Idaho. This effort is underway to support development of water quality standards. This survey has been designed to obtain data necessary for determining fish consumption rates for the Shoshone-Bannock Tribes (Sho-Ban). The survey is focused on both current and heritage rates. This information will be useful in developing water quality standards that are protective of the health of Tribal members as well as of other residents of Idaho.

1.1 Survey Background and Purpose

Water quality is of great importance to the Native American Tribes in Idaho, since a substantial portion of their diet is derived from aquatic sources, and water and aquatic resources play an important cultural and spiritual role for them. EPA Region 10 is conducting fact finding to assist Tribal governments in Idaho to identify fish consumption rates² that are appropriate for use in setting Tribal ambient water quality criteria (AWQC) to protect human health. Idaho Tribal FCRs may also be of use to the State of Idaho as Idaho AWQC undergo revision.

The numeric value for a particular AWQC is inversely dependent on the FCR used to derive it. As the FCR increases, the AWQC becomes lower, or more stringent (and, therefore, more protective of human health). This is particularly true for bioaccumulative chemicals (i.e., chemicals that dissolve in fat and increase in concentration at higher levels of the food chain).

It has been documented elsewhere in the Pacific Northwest (e.g., Puget Sound and the Columbia River) that tribes consume far more fish and shellfish than the general U.S. population. EPA is thus interested in investigating FCRs for Idaho Tribes to support development of AWQC to protect high Tribal fish consuming populations.³

² A fish consumption rate (FCR) is the amount of fish and shellfish (by weight) that is consumed by a person on a daily or annual basis.

³ EPA is also interested in protecting the health of other high fish consuming populations (e.g., recreational anglers or ethnic minorities). The State of Idaho is currently preparing a survey to determine FCRs for recreational anglers.

EPA has a national goal, established by the Clean Water Act (CWA), to protect water quality so that fish and shellfish thrive and can be safely eaten by humans. AWQC serve as an important tool in these efforts. AWQC are used by the CWA National Pollutant Discharge Elimination System (NPDES) to establish permits for allowable levels of contaminant discharge to the Nation's waters as well as other water quality management tools to reduce toxics and protect human health. Protection of tribal health is an important consideration for these regulatory efforts.

The purpose of this report is to provide a survey design for collecting Tribal fish consumption information for the Shoshone-Bannock Tribes. The information resulting from implementation of the survey can be used to set AWQC for Tribal waters. This survey effort will help Tribes build capacity for measuring FCRs, inform tribal fisheries management, and document the importance of fish in tribal culture and lifeways. The survey results may also be useful for the State of Idaho in its decision-making process for development of water quality standards.

1.2 Procedures Used to Develop Design Document

The development of this survey design included informative visits with the five Idaho Tribes on their reservations, including an open exchange of interests, concerns, and ideas; collection and review of relevant information on culture, history, fisheries, environment, and Tribal objectives; investigation of statistical methods and development of an appropriate approach for the fish consumption survey; drafting a multi-part survey questionnaire, including questions on past, current, and future consumption patterns; calculations to support a statistically valid design for each of the Tribal surveys; and coordination with involved agencies, tribes, consortia, and consultants.

The Tribal visits helped the survey team develop a working relationship with each of the Tribes and provided critical information for the survey design. The type of information gathered included the Tribes' objectives for the survey; the type of data compiled in their tribal registers (to be used for sample selection); existence of and content of historical records on fisheries resources; issues on language, travel and communication; planning for tribal hosting of and publicity around the surveys; issues of confidentiality of Tribal data and future survey records; and discussion of tribal capabilities for carrying out duties during the implementation phase.

Historical reports, past questionnaires, guidance documents, literature articles, and study methodologies were reviewed. Specific topics of interest relevant to this work included fish species, preparation methods, ceremonial uses, and suppressed consumption. As available, ethnographic information for each Tribe was reviewed. A list of additional resources related to this effort are provided in Section 7 of this report.

Design development included the evaluation of appropriate methodologies for a fish consumption survey; defining the population of interest; drafting a questionnaire based on survey objectives; performing calculations to support a statistically valid design for each of the Tribal surveys; incorporating methods to account for the effect of suppressed consumption; and specifying key elements of the survey operation.

The State of Idaho is also planning to implement fish consumption surveys. Coordination with the State of Idaho survey involved periodic conference calls with the survey design teams, agencies, Tribes and consultants to discuss technical topics related to the survey design. For example, methods of accessing survey participants, sampling frames, sharing of questionnaires and documentation from past surveys, defining consumers and non-consumers, species lists, and identification of survey components were discussed and may promote comparison of the final results from multiple surveys.

1.3 Survey Objectives for the Shoshone-Bannock Tribes

The Shoshone-Bannock Tribes' primary objective for the fish consumption survey is to develop water quality standards that will result in clean water and clean fish, both of which are vital to their existence, but which are being (or have been) lost. The Tribe has been working for many years to improve and return anadromous fish runs to the traditional fish areas and to protect, restore, and enhance fish-related resources in accordance with the Tribes' unique interests and vested rights in such resources. Currently, they cannot drink the water or eat the fish due primarily to contamination and development. Their overarching goal is to bring back full-system functionality of the entire basin and provide clean resources to sustain Tribal health and culture. This survey may help document the strong connection of spiritual, mental, and physical wellbeing of Tribal members to the natural resources. An objective of the Tribe is that results of this survey and the resulting water quality standards should support the Tribe's future expectation of an enhanced fishery and should be adequately protective of fish consumption by the Tribe in the future.

1.4 Role of Current Survey and Historic Assessment

There are three eras of importance for a fish consumption study: the past, present, and the future. Considering the past, over an extended period of time the Sho-Ban Tribes have experienced environmental and social changes that have reduced fish abundance, access to fish, safety of fish consumption, and fish consumption itself. The Tribe is seeking to increase fish availability, fish safety (i.e., free from contamination), and fish consumption in the future. Thus, current consumption does not reflect the Tribe's past nor its goals. Assessing consumption through a current, cross-sectional survey will provide relatively precise information about current consumption only. For the overall goals of this survey, the current consumption rates should not be considered in isolation. Assessing past consumption through an assessment of historical materials and, potentially, interviews with some older individuals whose history reaches back a long lifetime may be highly informative, but rates so derived are likely not as precise because they involve longer-term recall and unknown quality and completeness of past documentation.

The rates and supporting materials generated by this study may be used in water quality regulation. The strength of the current rates is that they are derived via a technically defensible methodology and that these rates can be compared to those of other populations. The strength of the heritage rates is their relevance to the goals of the Tribe. Future rates may be projected based on anticipated increases in fish populations resulting from planned or ongoing habitat restoration and supplementation efforts, and associated increases in fish consumption.

2.0 TRIBAL STORY ON SUPPRESSION

This section describes the Shoshone-Bannock Tribes' story about suppression, based primarily on existing literature and supplemented with input directly from the Tribes. Historical fish harvest and fish consumption by Tribal members is presented, followed by causes of decline in the fish populations, and hopes for the future. Additional research and Tribal input will be required during the survey implementation phase to account for suppression and the implications for future fish consumption.

2.1 **Suppression Effects and Their Implications**

According to the National Environmental Justice Advisory Council (NEJAC, 2002), a “suppression effect” occurs when a fish consumption rate for a given population, group, or tribe reflects a current level of consumption that is artificially diminished from an appropriate baseline level of consumption for that population, group, or tribe. The more robust baseline level of consumption is suppressed, inasmuch as it does not get captured by the current FCR.

There are circumstances in which suppression effects have implications for an environmental justice policy that seeks to sustain healthy aquatic ecosystems and to protect the health and safety of people consuming fish, shellfish, aquatic plants, and wildlife for subsistence, traditional, cultural, or spiritual purposes. First, a suppression effect may arise when an aquatic environment and the fish it supports have become contaminated to the point that humans refrain from consuming fish caught from particular waters. Were the fish not contaminated, these people would consume fish at more robust baseline levels. Second, a suppression effect may arise when fish upon which humans rely are no longer available in historical quantities (and kinds), such that humans are unable to catch and consume as much fish as they had or would. Such depleted fisheries may result from a variety of affronts, including an aquatic environment that is contaminated, altered (due, among other things, to the presence of dams), overdrawn, and/or overfished. Were the fish not depleted, these people would consume fish at more robust baseline levels. Third, a suppression effect may occur from loss of access to fisheries resources and changes in social structure such that individuals no longer harvest fish to the same extent as before, or do not harvest at all.

The implications for environmental justice policy will depend in part upon which of these scenarios accounts for the suppression effect observed. They will also depend upon how the more robust “baseline” level is defined – an exercise that itself raises important environmental justice issues. This question of an appropriate “baseline” will in turn be

related to the particular group affected. In some cases, for example, a tribe will be able to cite a historical “point of reference” that would describe an appropriate baseline in terms of environmental quality, geographic delineation, and treaty rights. In each case, there may be important questions of history, culture, and aspiration to be considered in determining an appropriate baseline; that is to say, an appropriate baseline might mean examination of what people had consumed as well as aspiration for what people would consume were there “fair access for all to a full range of resources,” (NEJAC, 2002) or were the conditions fulfilled for full exercise of treaty- and trust-protected rights and purposes.

When environmental agencies employ a suppressed FCR – under any scenario in which suppression effects occur – they may set in motion a downward spiral where inappropriately lax environmental standards permit further and further contamination or depletion of the fish and so diminish health and safety of people consuming fish, shellfish, aquatic plants, and wildlife for subsistence, traditional, cultural, or spiritual purposes. This survey is intended to develop the most precise FCRs as possible while taking into consideration heritage rates as they relate to aspired future rates. An approach is presented for determining the Tribe’s heritage rates based on a critical evaluation of existing historical literature. Results of the heritage rate study will be presented with supporting materials in the final survey results report.

2.2 Historical Fish Harvest and Consumption

The Shoshone and Bannock people’s homelands are vast and far-ranging and encompass what are now known as the states of Idaho, Oregon, Nevada, California, Utah, Wyoming, Montana and beyond. Rivers that the Shoshone and Bannock people used included the Snake, Missouri, and Colorado rivers, all of which provided past and current subsistence needs. These natural resources provided food, medicine, shelter, clothing and other uses and purposes, intrinsic to traditional practices (BOR, 2012).

Salmon provided the Shoshone-Bannock with their most abundant and predictable supplies of fish. For those who lived along the waterways of the Salmon River and its tributaries, or along the Snake below Shoshone Falls, anadromous fish were the primary aquatic food resource. On the Snake River, Shoshone Falls was the absolute limit of salmon migration, while Auger Falls, the Upper and Lower Salmon Falls, seriously impeded their upstream movements. Some anadromous species also entered the tributaries of the Snake but did not move far upstream. Even the Shoshone-Bannock who wintered on waterways above the salmon runs relied on anadromous fish

and annually traveled to fisheries downstream where various species could be caught on a regular and recurring basis (Albers et al., 1998).

Walker (1977, as cited in Scholz, 1985) reported that “[t]he Shoshone-Bannock, as well as their neighbors the Northern Paiute in southwestern Idaho, regularly took salmon below Shoshone Falls.” Craig and Hacker (1940, as cited in Scholz et al, 1985) quote Washington Irving as stating “[t]he early traders report that Indians at Salmon Falls on the Snake River took several thousand salmon in one afternoon by means of spears.” Suckley and Cooper (1860, as cited in Scholz et al, 1985) reported:

“In some of the branches of the Columbia salmon penetrate to the Rocky Mountains, but they cannot ascend the Snake above Rock Creek between Fort Boise and Fort Hall, where the great Shoshone Falls stops them. Fort Boise is a great fishing ground for the Bannocks and other bands of the Shoshone or Snake Tribe. We found them taking vast numbers at the end of August 1849.”

Historically, Shoshone and Bannock speakers commonly identified themselves and the people who lived around them by names that designated a prominent geographic feature or an important food taken at the locales through which they traveled (Albers et al., 1998). Often, the same names were attached to peoples residing in different places. Agaideka, “Eaters of Salmon,” was used simultaneously to identify people on the Salmon and Lemhi Rivers as well as those near the middle reaches of the Snake River below Shoshone Falls, while Pengwedeka, “Eaters of Fish,” applied to Shoshone-Bannock who wintered near Camas Creek and those who had wintering spots near the mouth of the Bear River (Albers et al., 1998). Scholz et al. (1985) estimated annual per capita fish consumption for the Shoshone-Bannock Tribes to be 800 pounds per year, or the equivalent of about 1,000 grams per day.

In June 1867, an Executive Order established the Fort Hall Indian Reservation, as a collective place to consolidate the various bands of Shoshones, Bannocks and even other tribes, from their aboriginal lands, clearing the way for European-American settlements, such as ranchers and miners who desired the rich resources present on aboriginal lands. The United States then signed a treaty, the Fort Bridger Treaty of 1868, with Shoshone and Bannock headmen, relinquishing any further claims to lands and title, but reserving the rights to hunt and fish on unoccupied lands in the United States (BOR, 2012).

Today, descendants of the Lemhi, Boise Valley, Bruneau, Weiser and other bands of Shoshone and Bannock reside on the Reservation. Tribal members continue to exercise off reservation treaty rights, and return to aboriginal lands to practice their unique culture and traditions. The Fort Bridger Treaty of July 3, 1868 was the only treaty ratified by Congress between the Eastern Shoshone bands and the Bannocks. In the Treaty, the Shoshone and Bannock people expressly reserved off-reservation hunting, fishing and gathering rights on the unoccupied lands of the United States (BOR, 2012).

Article IV of the Treaty reserved the right for the Tribes to maintain a cultural, social and spiritual link to their ancestral homelands. Over the past 150 years the Tribes have utilized these unoccupied lands to visit significant sites, hunt, fish and wildlife for subsistence, gathered botanical species for medicine and food. In addition to the reserved Treaty rights, Tribal members also continue to exercise inherent rights including, but not limited to, visits to sacred sites or practice of traditional cultural practices (BOR, 2012).

2.3 Causes of Decline in Fish Populations

Salmon once spawned in tributaries of the Snake River throughout Idaho. In the early 1900's, the construction of dams blocked salmon from several tributaries. Many of those dams were constructed without fish ladders or were too high to allow for fish passage. Swan Falls dam on the mainstem Snake River near Marsing, Idaho, and dams in the Owyhee, Boise, Payette, Grand Ronde, Salmon and Clearwater rivers stopped anadromous species in the early 20th century (Idaho Rivers, 2013).

The Hells Canyon Dam complex in the middle Snake was completed in 1967, blocking all salmon and steelhead runs above the dams. Fall chinook that spawn in the main stem Snake River are now confined to the stretch below the complex (Idaho Rivers, 2013).

The Upper Snake River subbasin is located in eastern Idaho and extends about 400 river miles from Idaho Falls to Shoshone Falls. Major tributaries include Blackfoot River, Portneuf River, Raft River, Goose Creek, and Big Cottonwood Creek (Colter et al., 2002). The single most influential limiting factor to native fish populations within the Upper Snake River subbasin is loss of habitat due to riparian and stream channel disturbance and to channel dewatering for irrigation withdrawals. The development and operation of hydroelectric dams on the Columbia River and its tributaries has contributed to the decline of fish and wildlife populations throughout the Basin.

Habitat limitations related to agriculture and grazing include unscreened irrigation delivery systems, sedimentation, upland and in-stream habitat disturbances, loss and degradation of functional riparian areas and wetlands, elevated summer temperatures, increased developments in agriculture areas resulting in habitat fragmentation, reduced stream bank vegetation and stability. In years of low snowpack, flows in water bodies and reservoir storage can be drafted to fulfill irrigation water rights impacting the quality and quantity of water (Colter et al., 2002).

One of the largest phosphate ore reserves in the United States is located in the Blackfoot River drainage. Environmental problems associated with phosphate mining were first documented in the 1990's, and an investigation of potential effects of selenium generated from phosphate mines on the fish and wildlife in the upper Blackfoot River drainage is ongoing (IDFG, 2007).

The distribution and abundance of Yellowstone cutthroat trout have declined in the Snake River Plain of Idaho through habitat degradation, genetic introgression, and exploitation (Thurrow et al., 1988 and May, 1996, as cited in Colter et al., 2002). Habitat degradation has included negative impacts from grazing (riparian loss, siltation, and widening and deepening of stream channels) and habitat fragmentation from impoundments and diversions. Many remaining populations exist as localized remnants of original sub-populations with little or no connectivity. Genetic introgression with non-native cutthroat and other trout is one of the greatest threats to remaining pure populations of Yellowstone cutthroat trout (Colter et al., 2002).

Potential threats to Yellowstone cutthroat trout in Idaho have been identified by Thurrow et al. (1988) and Gresswell (1995). Threats include genetic introgression with rainbow trout, impoundments, water diversion, road culverts, improper livestock grazing, mineral extraction, angling, and competition with non-native species. Whirling disease has been identified as a more recent potential threat (all as cited in IDFG, 2007).

Riparian areas on the Fort Hall Indian Reservation have been negatively affected by lateral scouring and downcutting of streambanks caused by years of unrestricted grazing and rapid flooding and drafting of American Falls Reservoir. Negative impacts from lateral scouring and downcutting include siltation of spawning gravels, loss of cover and pool depth, increasing width to depth ratios of stream channels, and resulting increases in water temperature (Colter et al., 2002).

Non-point source pollution and water diversions are the predominant influences on surface water quality in the Upper Snake River subbasin. Pollutants of greatest concern that have been associated with stream habitat degradation include nutrients, sediment, bacteria, organic waste, and elevated water temperature. Irrigation drainage, aquaculture effluent, municipal effluent, hydrologic modification, and dams affect water quality in the middle reach of the Snake River. Segments of the river were listed as water quality limited in 1990 because nuisance weed growth had exceeded water quality criteria and standards established for protection of coldwater biota and salmonid spawning (Colter et al., 2002). The Tribes believe that environmental, economic, and social factors have all impacted subsistence resource use (Sho-Ban, 2013a).

2.4 Hopes for the Future

For many years the Shoshone and Bannock Tribes have been working to improve anadromous fish runs back to the traditional fish areas. The historic hunting and fishing areas of the Tribes included all of central and southern Idaho. Rights to continue traditional activities were reserved by the Tribes through the Fort Bridger Treaty of 1868. The downward trends in returns of anadromous fish have been and will continue to be a concern to the Tribes. Many factors have been implicated for the decline in returning adult fish in the Salmon River basin including impaired mainstem passage, harvest, predation, impacts from hatchery programs, blocked habitat, and degraded habitat in spawning and rearing streams (NPPC, 1994). However, attempting to document increases in adult returns as a result of habitat enhancement has been difficult because of out-of-basin factors (BOR, 2012).

The mission of the Shoshone-Bannock Tribes Fish & Wildlife Department is to protect, restore, and enhance fish and wildlife related resources in accordance with the Tribes' unique interests and vested rights in such resources and their habitats, including the inherent, aboriginal and treaty protected rights of Tribal members to fair process and the priority rights to harvest pursuant to the Fort Bridger Treaty of July 3, 1868. The Shoshone-Bannock Tribes have developed a policy for management of the Snake River Basin resources, which states:

“The Tribes will pursue, promote, and where necessary, initiate efforts to restore the Snake River system and affected unoccupied lands to a natural condition. This includes the restoration of component resources to conditions that most closely represent the ecological features associated with a natural riverine ecosystem. In addition, the Tribes will work to ensure the protection,

preservation, and where appropriate-the enhancement of Rights reserved by the Tribes under the Fort Bridger Treaty of 1868 and any inherent aboriginal rights.”

The Snake River Policy is utilized to identify additional land management impacts within the Snake River Basin and will similarly identify alternative management strategies and apply mitigation measures consistent with this policy. The Tribes are involved in a number of anadromous fish, resident fish, and wildlife programs slated for implementation include:

- Anadromous Fish Program
- Salmon River Habitat Enhancement Project
- Idaho Supplementation Studies Project
- Snake River Sockeye Salmon Habitat and Limnological Monitoring Project
- Crystal Springs Fish Hatchery Planning, Operations, and Maintenance Project
- Crystal Springs Fish hatchery Program
- Yankee Fork Salmon River Satellite Facility
- Panther Creek Satellite Facility
- Umbrella Planning Projects
- ESA Habitat Restoration/Rehabilitation Project
- Yankee Fork Floodplain Restoration
- Salmon River Basin Nutrient Enhancement Project
- Yankee Fork Chinook Salmon Supplementation Project
- Chinook Salmon Egg Incubation Project
- Summer Steelhead Egg Incubation Project
- Panther Creek Chinook Salmon Supplementation Project
- Yankee Fork Steelhead Smolt Project
- Chinook Salmon Harvest Management Project
- Bear Valley Creek Chinook Salmon Abundance Monitoring Project
- Crystal Spring Hatchery: Planning, Operations, and Maintenance
- Habitat Improvement/Enhancement – Fort Hall, Idaho

The Tribes' are teaching the benefits of traditional foods through a Tribal health education program, although access to resources at traditional harvest areas, such as the Fort Hall Bottoms, have been reduced due to contamination and other causes. While the Tribes recognize that historic consumption rates have fallen significantly, evaluation of historic rates will help identify future consumption expectations.

2.5 Estimating Heritage Fish Consumption Rates

Based on discussions with Tribal representatives and other experts on the issues of suppression and heritage fish consumption rates, the survey design team recommends that, as part of the survey implementation phase, heritage fish consumption rates be estimated for each of the individual Tribes. The design team believes that current survey respondents may provide useful information and context regarding heritage consumption rates, but that the approach to estimating heritage rates should be primarily based on a comprehensive review and evaluation of literature that is relevant to heritage rates, including historical accounts and modern studies of heritage consumption rates.

For Tribes that harvest fish from the Columbia River basin, there is a significant volume of literature to form the basis for quantitative estimates of fish consumption rates, or ranges of rates. Information includes ethnographic studies, personal interviews, historical harvest records, archaeological and ecological information, and nutritional and dietary information.

During project implementation, the survey team will compile and evaluate relevant available information regarding heritage consumption rates specific to the Sho-Ban. The development of estimates of heritage rates should include a thorough discussion of the types of information available regarding consumption, a discussion of the methodologies used to develop the estimates, and a discussion of factors affecting the uncertainty associated with the estimates. Finally, the implementation team should develop a quantitative estimate of a heritage fish consumption rate or range of rates for the Tribes.

One aspect of the quantitative assessment will be a compilation and analysis of historic and heritage information across the region (primarily for the Idaho Tribes). The purpose of this compilation and analysis will be, to the extent possible, to reduce the uncertainty associated with individual heritage rates or update the rate calculations by a statistical methodology that uses data for multiple Tribes, locations, and times. An analysis which shows consistency in relationships among these variables will support the individual heritage rates. Further, it may be possible to estimate a range of rates for the Tribes based on a joint (multivariate) analysis of heritage, including tabular and graphical displays and numeric estimates of a plausible range.

3.0 SURVEY DESIGN: TARGET POPULATION

This section describes the survey design approach as it relates to the target sample population and sampling frame, including phasing in of multiple surveys.

3.1 Target Population to be Sampled

The target population for the survey is enrolled adult members of the Shoshone-Bannock Tribes, age 18 and over. The population to be sampled in this survey can be tentatively defined as enrolled adults (age 18+) who live within a specified geographic area around the Fort Hall Reservation, e.g., a distance reflecting up to a reasonable drive time, such as 1-2 hours. While a distance cut-off may appear arbitrary for a population definition, some kind of practical cut-off is needed, since some tribal members may reside at great distances from the reservation. Distance will be defined by zip code or location of residence in relation to a central site for interviewing. The site or sites will be identified in cooperation with the Tribes. Due to the expected high correlation of diets and the substantial time per interview, the survey will be limited to enrolled tribal members and will not include non-tribal spouses or other non-tribal adults. The residential location of all members will be checked with the Tribes just prior to the sample selection. The specific tribal members in the population to be sampled will be identified from the Tribal enrollment roster in cooperation with the Tribal authorities.

Among the adult population, there will be a sub-population of non-consumers of fish, and these people would be detected in an initial telephone screening (described in Section 4.4.1). For the non-consumers, defined as those who have not eaten fish in the last year, the screening will determine the reasons for non-consumption, such as taste (dislike of fish), concern about advisories or pollution, or other reasons. No further information will be collected for non-consumers (some demographic information will be available from the tribal enrolment roster), and the main focus of the effort on the fish consumption survey will be confined to fish consumers only.

An exclusion from the sample, if they should be selected in the sampling process, is persons living in an institutional setting (e.g., nursing homes). The reason for the exclusion is that in this special population, expected to be small, a totally different questionnaire and data collection method would be needed. Secondly, an institutionalized person is usually not free to make decisions about their fish consumption, and it is not clear to what extent that consumption represents the tribal way of life.

Another exclusion is the tribal sub-population of children and young adults (age <18 years). This demographic group has been excluded at this time to avoid a potential insufficient sample size in an effort to shorten an already detailed and lengthy interview process for each adult interviewed and collectively ensure an adequate number of adult interviews within the resources available.

3.2 Phasing-in of the Survey

The design team recommends that the survey implementation be carried out in phases, with one or two Tribes selected initially to start. It is likely that a great deal will be learned about what works well and what does not work during the early part of the survey. While the survey design is certainly intended to provide an excellent framework for all of the Tribes, it is inevitable that important working points will be learned as the implementation team proceeds, collaborating with these unique populations. Thus, the survey might start with one or two Tribes and then proceed to a second and a third, etc., at short intervals. Alternatively, the survey may start with one Tribe but then proceed with the other Idaho Tribes with a modest delay after that. This is a decision that is best made closer to initiation of the survey. The survey team will communicate with tribal fishery staff to determine the several seasons of fishing and fish consumption. The survey will be scheduled to overlap significant seasonal periods.

3.3 Sampling the Population

The enrollment roster of the Sho-Ban will be the sampling frame and basis for sample selection. The roster is expected to be reasonably complete and up to date, since tribal membership includes benefits that motivate enrollment. The enrollment roster is expected to include age, birth date, gender, address (including zip code) and other fields.

The population to be sampled will be limited to specified zip codes or other location indicators. As noted earlier, the locations will be selected in order to accommodate a reasonable amount of travel time for members to attend a central site for interviewing. It may be possible for some interviews to be conducted closer to or at a respondent's home when there are issues of health and ability to travel.

The Shoshone-Bannock Tribes will supply the data on their adult population counts by zip code of residence. The design team will use the data to fill in Table 3-1 for the Sho-Ban. The table will help the design team and the Tribes to decide on the geographic area from which survey participants will be selected.

Table 3-1. Number of adult Tribal members by distance from Tribal reference point defined by zip code of residence

Distance (miles)	No. of members	Zip codes included
<5	N	11111, 22222, 33333, etc.
5 to <10	N	44444, 55555, etc.
....
40 to <50	N	88888, 99999, etc.
Etc.		

3.3.1 Sample Stratification

The eligible adult population (defined by age 18+ and an eligible zip code of residence) will be sampled using stratification. “Strata” are simply population groups defined by some characteristic. For example, six strata might be defined by age and gender to include young adults, the middle aged, and Tribal elders, classified separately by each of the two genders. One use of stratification is to insure that the sample will represent the population faithfully. For example, if six strata (not necessarily age-related) cover the whole population and have about one-sixth of the population each, then one-sixth of the sample can be drawn from each stratum.

An ideal stratifying factor for this survey would be defined by an *a priori* indication of level and frequency of fish consumption. High-level consumers are needed since there is particular interest in the higher percentiles of fish consumption, which the high consumers would tend to define. Secondly, as explained later, frequent consumers (who also tend to be high-level consumers) are needed for the survey’s planned use of a particular method (National Cancer Institute or NCI method) to estimate the fish consumption distribution from two or more 24-hour dietary recall interviews. In the use of the methodology to analyze the 24-hour recall interview data, it is important to have enough respondents with two days of fish consumption. Currently, age, gender, and location (defined by zip code) are the only candidates in the roster for the Sho-Ban that might define higher vs. lower level consumers. Fish consumption rates in relation to age show mixed results for the Native American surveys in the Pacific Northwest. Thus, the phone screening process (Section 4.4.1) is needed to identify frequent consumers who may, then, have a higher probability of consuming fish on the second of the two days of 24-hour dietary recall. The second interview will occur within a time window (yet to be specified) probably of one to four weeks after the initial interview. The time window will

be selected to yield an independent eating occasion but not so long that seasonal effects (e.g., associated with fish availability) will influence fish consumption.

Strata will be defined by the combination of age, gender, and frequency of consumption, with frequency determined from the phone screening process. The age-by-gender composition of the Sho-Ban will be provided by the Tribes. The age group breakdown will be helpful in forming initial strata, which will then be sub-divided by at least two frequency categories, such as consumption of fish ‘two or more times/week’ vs. ‘less than twice per week.’ Again, these strata will both insure that the population can be well represented by the sample selected, and in addition, allow over-sampling of the high-frequency strata. An oversimplified stratification is shown in the table below.

Table 3-2. Hypothetical strata based on three stratifying factors: age, gender and frequency of fish consumption

Stratum	Gender	Age group	Consumption frequency
A	Male	18-44	< 2x per week
B	Male	18-44	≥ 2x per week
C	Male	45+	< 2x per week
D	Male	45+	≥ 2x per week
E	Female	18-44	< 2x per week
F	Female	18-44	≥ 2x per week
G	Female	45+	< 2x per week
H	Female	45+	≥ 2x per week

3.3.2 Sample Selection

Once the strata are defined in terms of age, gender and frequency of consumption, potential respondents for screening will be selected randomly from each age-gender stratum (combining the frequency strata). If there are appropriate non-disclosure agreements and adequate security and confidentiality procedures in place, and if the Sho-Ban Tribes agree, a copy of the enrollment file with fields needed for sample selection can be transferred to the implementation team and then deleted (including derived files) after there is no further need for the file or after a mutually agreed period has expired.

If the Sho-Ban does not wish to “loan” the enrollment file for sample selection purposes, an alternate procedure of sample selection can be used. In order to preserve the confidentiality of Tribal members listed in the electronic enrollment file, the enrollment office will be asked to take the following steps.

1. Apply any member exclusions (such as non-eligible zip codes and persons less than 18 years of age) and save a copy of the resulting file.
2. Add a field defining age and gender for each person. These strata labels will appear for each person in the file.
3. Sort the file in random order. Almost any random sort software can be used here.
4. Starting with the randomly sorted file from the previous step, add a field with a new sequential survey identification number (“surveyID”), which should be a sequential number, e.g., 1, 2, 3, The correspondence between this unique survey ID number and the Tribes’ unique ID number will allow communication between the survey implementation team and the enrollment office, as needed. Due to the random sort prior to this step, the assigned survey ID number will be non-informative about any member characteristics—a helpful step in preserving confidentiality.
5. Save a file which contains only the new survey ID number, and selected demographic data (e.g., gender, age in grouped categories). Transfer this file to the implementation team.
6. The implementation team will select the sample from the file provided by the Tribe and return the file of the selected sample to the Tribe. The implementation team will work with the Tribe to generate a list of the sample suitable for phone screening (including names and contact information).

The implementation team will select the specified respondent count for screening from each stratum by random selection. This process should be carried out under the supervision of the statistician working with the implementation team. See the section on sample size for the specified sample count for the Sho-Ban.

The random selection process will generate a list of potential respondents for the screening step. This screening list will include 3 to 5 times as many individuals as the ultimate effective sample size, since a number of individuals may need to be screened to identify each frequent consumer. The screening list will be divided into 4 to 5 sections corresponding to waves of screening. Within each section, the age-by-gender composition of the list will be similar to the composition of the Tribes.

By screening in several waves, the implementation team can examine initial results to better understand the population as well as determine what screening methods will yield a higher percentage of frequent consumers from the first or early waves. This allows the team to refine a sampling plan so that resources are allocated most effectively. For the 24-hour recall component of the interviews, it is especially important to obtain a large enough number of people who consume fish on both recalls. The implementation team will need to focus the selection effort on identifying people who are likely to meet this condition in order to provide the best chance of obtaining data suitable for use with the NCI method. After the initial full interview, frequent consumers can be given a higher probability of selection for the additional second 24-hour recall interview. All initially interviewed respondents (supplying food frequency interview and an initial 24-hour dietary recall report) will have a positive probability of selection for the second 24-hour recall. However, frequent consumers will be assigned a higher probability of selection. While all respondents supplying an initial 24-hour dietary recall will have some probability of selection for the second 24-hour recall, not all of them will be selected. Nevertheless, all of those selected for the second 24-hour-recall will be selected on a probability basis from the first recall and not by a categorical selection that absolutely excludes some first-recall respondents.

A list of respondents to be interviewed in person (in waves, corresponding to the sections of the screening list) will be generated by the screening process. The initial screening list will be turned over to Tribal members hired to help with the survey, and they will carry out the screening process under the direction of the implementation team.

4.0 SURVEY DESIGN: DATA COLLECTION

This section describes the survey design approach as it relates to the survey method, measurement method, sample size, and questionnaire development.

4.1 Survey Methods

Based on our experience, in-person interviews are superior to many other survey research modes for many reasons; however, for most studies, in-person interviews are cost prohibitive and a compromise must be achieved between “best practices” and budget constraints. In-person interviews allow the respondent to see survey aids (in the case of this study, photographs and models) and to establish a face-to-face connection with the interviewer. In addition, respondents generally tolerate longer in-person interviews than telephone or other interview modes (Doyle, 2005).

4.1.1 Selection of In-Person Interviews vs. Other Methods

Based on a review of the literature and decades of experience, we have identified several possible modes for this study. Below is an examination of various modes but, in a summary, we recommend in-person interviews for this survey. They are a superior solution for this project due to their inherent cultural advantages and the expected length of the interview for this survey.

Although mail surveys are generally less expensive than other modes (in-person, telephone, online), they suffer from poor response rates. Without a staff member prompting the potential respondent to complete the interview, it is very easy for recipients to discard the questionnaire without opening it. Further, self-administered mail questionnaires are rife with opportunities for respondents to provide incorrect, improper, or no answers to questions that they do not understand or do not care to answer. A telephone interview, an in-person interview, and online interview can all be structured in a way to alert the respondent when they've failed to answer a question or gone outside the choice parameters—a mail questionnaire cannot do that. Based on our research, mail questionnaires are insufficient for high-quality data collection, especially for long interviews. (The anticipated length of this interview is approximately one hour.) Finally, mail surveys exclude members of the target population who are not literate.

Telephone studies are a popular mode of survey research, allowing for centralized management of the sample frame, the interviewers, and project administration.

Telephone surveys, when programmed with computer-assisted telephone interviewing software, can include complex skip patterns and other calculations which are less

feasible with mail surveys and in-person interviews. Telephone studies allow convenient monitoring and supervision of the interviewing staff, ensuring consistent administration of the questionnaire. However, telephone studies lend themselves to social desirability bias, the notion that a respondent seeks to provide answers which will increase the likelihood that the interviewer “likes” the respondent (Maguire, 2009). Further, telephone studies are limited to respondents with telephones, obviously; it is difficult to ensure 100% coverage within the sampling frame if it is based on the telephone alone.

The telephone approach also has another disadvantage for dietary surveys. With a telephone interview it is more challenging to use visual aids for identifying species and quantifying portions. While materials might be mailed or emailed in advance of the interview, that is another level of complexity for the survey and the respondent, and it may be difficult to have the proper conjunction of pre-sent materials and the specified interview appointment. Further, the planned interview goes into some detail on a number of topics and the hour or hour-plus duration of a phone interview may lose cooperation and accuracy of reporting.

4.1.2 Use of Photographs and Portion Size Models

There are different ways to measure respondent food consumption, including administering questions verbally, with or without visual aids. The use of aids such as photographs and portion size models is a well-accepted measurement device when collecting respondent-reported data. This is consistent with other, large-scale, ongoing survey research projects, such as the National Health and Nutrition Examination Survey (NHANES), which uses portion size models for its initial in-person 24-hour dietary recall. The portion model representation will include composite dishes, such as stews, chowders and other mixtures.

In order to ensure the most accurate self-reported data about past food consumption, we strongly recommend the use of either photographs, portion size models, or a combination of both for this survey. Although photographs lack the tactile and 3-dimensional visual appeal of portion size models, they have been shown to be equally as effective (providing accurate measurement) as portion size models (Thompson and Subar, 2013). During the pilot test, portion models should be used to verify their efficacy.

The design team is collecting displays to use as species and portion-size choices for use in the interviews. See Section 4.4.6 for more information about development of these portion size models and other visual displays that will be useful tools for

respondents to indicate fish consumption types and quantities during survey implementation.

4.1.3 Use of Tribal Interviewers

This project represents an important step in the evaluation of fish consumption among native populations in Idaho. To encourage participation from respondents, professional interviewers will administer the questionnaire to each respondent. The interviewing staff will be selected, hired, and trained from among Sho-Ban members. Tribal representatives reported that Tribal interviewers are necessary to gain and maintain respondent trust. Further, Tribal interviewers are familiar with the local area.

Complementary goals during the survey include decreasing respondent burden and increasing respondent comfort. We expect that an interviewer who shares heritage with the respondent can more easily identify and adhere to cultural norms and sensitivities. The interviewer may be more attuned to the respondent's background, living situation, and local conventions and events. In short, we expect greater affinity between respondents and interviewers who are from the same Tribes than between respondents and interviewers who are not Tribal members. Additionally, this study covers a broad geography in rural Idaho. In addition to our efforts to match interviewers to anticipated socio-demographic characteristics of respondents, by using local Tribal interviewers, study and travel costs may be reduced.

4.2 Measurement Method

The survey will use two methods to measure current fish consumption. The first method will be based a food frequency questionnaire (FFQ) which ascertains species-specific frequency of consumption and typical quantities eaten per eating occasion. The questionnaire will also allow these quantities to vary by 'season' with up to two periods per species. A 'season', as the term is used here, is one or more periods when the respondent reports consuming fish at a rate different than that of other periods during the year. Some species may be consumed by a particular respondent year-round at about the same rate, and that respondent would have one season (over one year) for that species. Consumption on ceremonial occasions and other special events will be covered by separate questions. See the questionnaire section of this document for the questions and wording of the FFQ (Appendix A).

The principle behind the FFQ is as follows. Briefly, a respondent's frequency of occasions of consumption of fish (per day, week, or month) multiplied by the typical quantity eaten per occasion will give the total quantity eaten per day, week, or month.

This quantity is easily converted to total annual consumption, which, divided by 365 days, will yield an average quantity of the given fish species eaten per day. A straightforward extension of this basic method, described later, can include seasonal variation and consumption at special events.

The strength of the FFQ is that average frequency and quantities of fish consumption are reported directly by the respondent. The weakness of the FFQ is that the respondent is relying on memory and must internally average their varying frequencies and varying quantities of consumption to come up with 'typical' values.

The second method is based on the respondent's recall of fish consumption during two or more specified 24-hour periods. Each period is the day before an in-person or telephone contact. The second (and later) interviews will be matched on the weekday vs. weekend occurrence of the initial 24-hour recall interview for a given respondent. The reason for this day-matching is to hold other variables relatively constant so that the variation between days of consumption is random variation in consumption *per se* and is not influenced by other weekly cycles of eating. For example, the difference between weekday and weekend fish consumption may be a fixed average difference and not simply random variation. (With a substantially larger sample size than will be used in this survey, the NCI method, by using certain information collected about each eating occasion, could accommodate a mixture of weekday and weekend fish consumption per respondent.)

The second step in working with the 24-hour recall surveys is use of the 'NCI method' to analyze the data collected (Tooze, et al., 2006). The NCI method uses some assumptions and statistical models to generate a fish consumption distribution⁴ that is consistent with the observed data in the two 24-hour dietary recalls.

A strength of the NCI method is that the respondent is having to remember only items and quantities consumed on the previous day. A weakness of the NCI method is that some strong (but reasonable) assumptions are needed to generate the distribution of average daily intake for a population. An additional weakness of the NCI method in the context of a fish consumption study is that it may be able to supply consumption estimates only for all fish species combined and for one or two frequently consumed species. For the less frequently consumed species there may be too few consumption

⁴ By 'distribution' in this report we are referring to values of the mean, median, and higher percentiles of the population's fish consumption rates. 'Distribution' has a more technical definition in the statistical literature.

'hits' on the sampled recall days to support a meaningful analysis. The design team recommends that the questions on the 24-hour recall be constructed to support estimates of frequency of consumption for a) all species combined, b) anadromous species, c) freshwater resident species, and d) marine species. The ability to make the consumption estimates for each of the individual species groups a, b, c, and d using the NCI method depends on having an adequate number of respondents who report eating from the species group on both of the two 24-hour recall interviews. However, even if the NCI method cannot be used, the FFQ will be designed to allow calculation of the consumption rate distribution for each of the major species, for all species combined, and for various groups of species.

The FFQ and the 24-hour questionnaires that will be used to support the fish consumption estimates can be viewed in Appendix A of this document.

4.3 Sample Size

Multiple sample sizes are considered here, corresponding to the following survey components:

- Initial telephone screening operation to identify non-consumers and high consumers
- Food frequency questionnaire (FFQ)
- 24-hour recalls (1st and 2nd recall days)

Some strata (or groups) of respondents will be sampled at a higher rate than others. For example, when characteristics of more frequent consumers or high consumers of fish are identified, a stratum of these tribal members will be sampled at a higher rate than members not in this stratum. Currently, the design team recommends that the high or frequent consumers be identified by the initial telephone screen. If one-quarter of the consumer population consists of high consumers, they may be sampled at four times the rate as the lower-level consumers, resulting in more than 50% of the sample consisting of high consumers. In the statistical analysis following data collection, each sampled high consumer would carry one-quarter of the weight compared to a low-end consumer in order to represent the entire population in an unbiased way. However, despite their quarter-weight, the extra sampling of high-end consumers will provide greater precision in estimation of the higher percentiles of fish consumption—percentiles of great importance in water quality regulation. Also, the over-sampling of

high consumers will provide a better basis for carrying out the NCI method of analyzing the 24-hour recall data.⁵

For each sampling operation considered, the driving factor in selection of a sample size is the trade-off between precision of an estimate—which improves with increasing sample size—and the mounting cost of a survey as sample size increases

4.3.1 Screening of Participants

An initial telephone screening call will be carried out to identify any non-consumers of fish and note reasons for non-consumption (described in more detail in Section 4.4.1). Non-consumers will not receive a personal interview.

4.3.2 FFQ Sample Size

Prior to presenting notes on sample size for this survey, a caveat is that the final sample size will depend on results from the survey pilot testing and telephone screening as well as a critical dependence on resources available to this project to carry out the surveys for the Idaho Tribes.

The desired effective sample size for the FFQ will be approximately 140 fish-consuming individuals. The “effective” sample size is smaller than the number of individuals sampled, because high consumers will be over-sampled in proportion to their numbers in the population. The effective sample size here takes into account the statistical weight given to each individual. A speculative guess is that 25% of consumers⁶ in the Tribe will be high consumers and if the high consumers are sampled at a fourfold rate compared to the low-consuming balance of the consuming population, then approximately 245 individual respondents will be included in the sample. The 245 individuals would include approximately 105 low consumers and 140 high consumers. The 140 high consumers would each have one-quarter statistical weight, yielding an effective sample size of 35 high consumers. (The full 140 high consumer respondents would be included in the analysis, but four high consumers carry the same statistical weight as one low consumer, thus the effective sample size of $140/4 = 35$ for high

⁵ One of the assumptions of the NCI method is that the within-person variance of the logarithm of the quantity consumed on a day with fish consumption is constant across all levels of consumption. If the assumption is true, there is no disadvantage to over-sampling high consumers. It may be possible to check this assumption if there is a sufficient number of respondents with two days of consumption.

⁶ The Columbia River Inter-Tribal Fish Commission survey results (CRITFC, 1994) reported that 38% of adult fish consumers had two or more fish meals per week (Table 8). Given that some respondents may have consumed two or more of their weekly fish meals on a single day, the value of 25% of respondents consuming fish on two or more days per week (i.e., high consumers) may be a reasonable value to assume for this work.

consumers.) The 105 low consumers plus the effective sample size of 35 high consumers yields a total effective sample size of 140.

Based on some preliminary simulation analyses, 140 completed FFQ questionnaires from randomly selected Tribal members would yield a mean consumption rate with a 95% probability of falling within +/- 25% of the true population value.⁷ This is a conservative estimate of precision (i.e., precision would likely be better), because the effective sample size of $n = 140$ stems from a much larger sample size of individuals, due to over-sampling of high-consumers. Under the same conservative assumptions, the 90th and 95th percentiles will have 95% probability of falling within about 40% of the true population value. Figure 4-1 shows the relationship between sample size and precision. It is apparent from the diagram that achieving high precision for the higher percentiles requires quite large sample sizes.

In order to yield approximately 140 high consumers and based on 25% high consumers and 30% refusals or no contact, the screening list will need to include approximately 800 individuals.⁸ The proportion of the population who are high consumers and the survey non-participation rate are speculative. For that reason, a phased start to the survey, as described in Section 3.2, is important with the implementation team learning from each wave of screening and then adjusting methods for the next wave.

⁷ The simulations were samples of size $n = 100, 200$ and higher from hypothetical surveys of populations with a lognormal distribution of fish consumption rates for consumers only. Different populations were considered to have mean consumption rates varying from low to medium to high (mean \pm SD of 19 ± 21 g/day, 82 ± 128 g/day and 214 ± 273 g/day, respectively). For each population and sample size 10,000 simulated 'surveys' of the given sample size were drawn and the sample mean, median and 90th and 95th percentiles were calculated. From the simulation distribution of a descriptive statistic, such as the mean, the 2.5th and 97.5th percentiles of the descriptive statistic were calculated. This range, though not a confidence interval, shows estimated limits within which 95% of survey results for the specific statistic would be expected to fall for the given population and sample size. Across the low, medium and high fish consumption populations the maximum percentage difference of the limits from the true mean was 25% for a sample size of 140 (using linear interpolation between sample sizes of $n = 100$ and 200). For the 95th percentile of consumption the corresponding maximum percentage deviation from the true 95th percentile was 39%.

⁸ Approximately 200 high consumers would need to have contact attempts in order to yield 140 net high consumers after a 30% loss rate. If 25% of Tribal members are high consumers, 800 Tribal members (of any consumption rate) would need to be contacted to find the 200 net high consumers. The low consumers can be selected from the remaining 600 Tribal members—the balance of the 800 who are not high consumers.

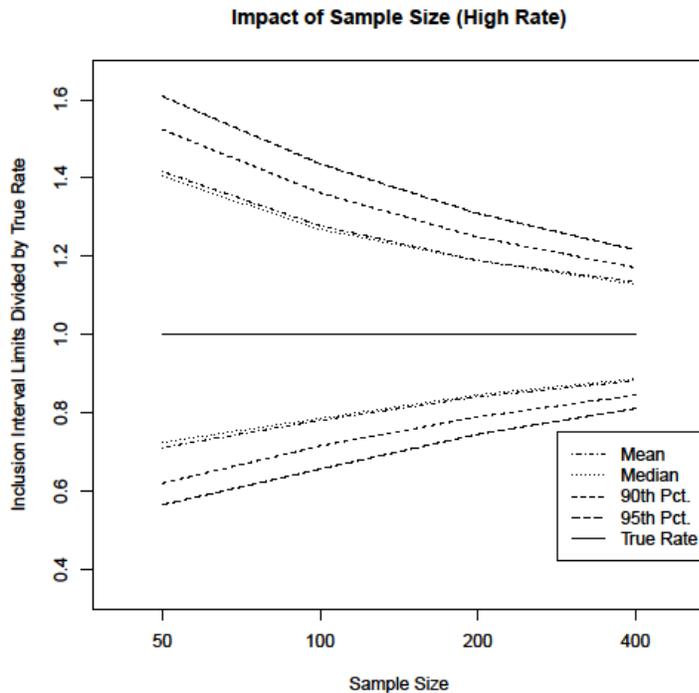


Figure 4-1. Precision of mean and selected percentile estimates vs. sample size

The upper and lower bounds for each estimate are expressed as a ratio to the true value. In 95% of surveys drawn from a population with a lognormal distribution of consumption rates, the estimated value of the statistic is expected to fall between the bounds corresponding to the survey’s sample size (bounds are approximate from simulation).

4.3.3 24-Hour Dietary Recall Sample Size

All of the expected 245 individual respondents will complete the first 24-hour dietary recall assessment. All of these 245 respondents will have the possibility of selection for the 2nd 24-hour recall interview, but the probability of selection will increase with increasing (grouped) quantity and frequency of consumption as determined from the FFQ. The goal is to adjust the net number sampled on day 2 of the recall to yield at least 50 respondents with fish consumption on both days of the 24-hour recall.⁹ The

⁹ The minimum number of respondents—50—who consume fish on both days of the 24-hour recall has been suggested by Dr. Kevin Dodd, one of the developers of the NCI method. This minimum sample size is based on the precision of a variance estimate. To put the $n = 50$ in perspective, standard deviations (SD) based on 25, 50, or 75 degrees of freedom for samples drawn from a normal distribution would have 95% confidence limits that differ from the estimated SD by no more than 39%, 25% or 19%, respectively. Thus, $n = 50$ has an associated 25% level of precision, which is fair (not excellent) precision.

implementation team will need to: a) choose a cut-off that defines frequent consumers in terms of the frequency of consumption (and possibly the quantity eaten on day 1 of the recall), and b) determine selection probabilities for day 2 of the 24-hour recall in order to have at least an expected 50 individuals with fish consumption on both days 1 and 2 of the 24-hour dietary recall. The key parameters in this calculation will be an estimated survey non-participation rate (refusal, no contact, etc.) projected to the day 2 attempted contact, the percentages of day 1 recall respondents who consume at various frequencies, and the day 1 quantity of fish consumed.

As a side note, it is possible that the number of sampled individuals with two recall days of fish consumption will not be sufficient to yield a meaningful estimate of the fish consumption distribution using the NCI method. In that case, the data from multiple Tribes may be pooled and used with the NCI method, introducing the Tribe as a categorical covariate or as the person-specific fish consumption rate for the species group being evaluated. That procedure will yield a distribution for each Tribe. However, some assumptions about commonality among the Tribes of certain statistics of the distributions will need to be tested and noted.

4.4 Questionnaire Development

A survey questionnaire, provided in Appendix A, was developed to help determine the fish consumption rate of the Shoshone-Bannock Tribes. The purpose of the questionnaire is to ask Tribal members about their dietary patterns and activities related to fish consumption in the past 24 hours as well as in the preceding 12 months to determine current fish consumption rates. This will be accomplished by conducting two 24-hour dietary recall interviews (the second of which will be administered after a week, but within four weeks after the first recall interview) and a food frequency questionnaire, as discussed above. The second 24-hour recall will be administered to a randomly selected sample of the first-interview respondents, weighted toward those determined to consume fish more frequently, based on the first interview. Data will be collected regarding fish species consumed, frequency of consumption, and portion size, with additional information gathered about parts eaten, preparation methods, and special events. Data will also be collected regarding changes in fish consumption patterns from the past and expectations for future consumption to develop a more accurate FCR that is not restricted by current-day suppression factors.

The questionnaire is written such that the trained interviewer can clearly follow the line of questioning, read each question verbatim, and record (in written form, by check box or circling) the information given by each respondent in the space provided in a

consistent manner. Words to be spoken by the interviewer are identified in bold text on the questionnaire, and each question will be asked in numeric order. Written information will only be recorded on the questionnaire form by the interviewer. Entry codes, species displays, and portion displays will be used during the interviews.

Past fish consumption surveys were reviewed, in addition to recent survey questionnaires developed by the Center for Disease Control and Prevention (CDC), for guidance in selecting wording for the current questionnaire. These resources are listed in Section 7. The questionnaire will be pre-tested (during a pilot survey) and revised as necessary prior to implementation. The questionnaire is organized according to the following sections, which are discussed in more detail below:

1. Telephone Screening
2. Interview Introduction
3. 24-Hour Dietary Recall
4. Food Frequency Questionnaire
5. General Information
6. Second 24-Hour Dietary Recall

4.4.1 Telephone Screening

Potential respondents will first be contacted by telephone. The initial phone contact will provide an opportunity to screen for fish consumers versus non-fish consumers and to discern why fish is not being eaten by the non-consumers. For those who do eat fish, an in-person interview will be scheduled with the respondent for a later date, if they are willing. The selection (or non-selection) of a tribal member reached through a screening call will be based on the survey's progress in filling in the required sample counts for each population stratum.

Each respondent will have his or her own Telephone Screening Contact Log. The Telephone Screening Contact Log will be maintained separate from the interview forms, as the contact log will provide the only documentation linking the respondent's name with the respondent's randomly assigned identification number. Subsequent interview forms will only include the respondent identification number to maintain confidentiality of the respondent.

This section of the questionnaire provides statements for the caller (interviewer) to make over the telephone and a log to record every contact attempt. If multiple attempts are made, the interviewer placing the call may vary (and may be different from the

person who ultimately conducts the interview). The Telephone Screening Contact Log will include the date, day of the week, and time of the call, name and identification number of the interviewer making the call, results of the call according to the entry codes provided, and whether or not the respondent consumes fish. If an in-person interview is scheduled over the telephone, the date and location of the interview will be recorded on the contact log.

4.4.2 Interview Introduction

The primary in-person interview will begin by documenting basic identifying information about the interview (who, when, where) and introducing the respondent to the project and the purpose of the interview. Administrative information will be recorded before (or as) the interview begins and will include the interviewer's name and assigned identification number, the respondent's assigned identification number (no name), and the date, day, start time, and location (city, state, and venue) of the interview. After the administrative information is recorded, the interviewer will read the introductory narrative to the respondent to formally begin the interview. The respondent will be reminded that their information will remain confidential. The primary in-person interview includes three parts, the 24-hour dietary recall, the FFQ, and general information. A second 24-hour dietary recall survey will be conducted for a subset of respondents by telephone.

4.4.3 24-Hour Dietary Recall

Following the introduction, a 24-hour dietary recall questionnaire will be administered to collect information on fish dietary patterns during the previous day. The objective of this component of the survey is to estimate total intake of fish that was consumed during the 24-hour period prior to the interview from midnight to midnight. The interviewer will read the questions in numeric order and complete the appropriate table, entering and circling answers as provided by the respondent.

The primary series of questions relate to the types of fish eaten over the past 24 hours, the quantity, preparation method, and source of the fish eaten. Once the interviewer has verified whether the respondent ate fish during the previous 24 hours, the interviewer will inquire about fish eaten during each occasion over those 24 hours, including species type (to be coded later), portion size (quantity), preparation method, and source of each fish meal or snack consumed by the respondent. Species and portion displays will be used.

A representative selection of respondents, weighted toward those identified as being high fish consumers, will be contacted for a second (separate) 24-hour dietary recall survey by telephone after a week, but within four weeks after the first interview. The second 24-hour dietary recall questionnaire will mimic the first, repeating the same inquiries as administered during the primary 24-hour dietary recall interview. The method of identifying species and sizing portions on the second 24-hour interview (by phone) is still being determined, but it is likely that it will use either displays left with the respondent at the initial interview or else delivered to the respondent.

4.4.4 Food Frequency Questionnaire

Following the 24-hour dietary recall, an FFQ will be administered to collect information on fish dietary patterns and associated activities over the past year. The objective of this component of the survey is to estimate total intake of fish that was consumed over the previous 12 months as well as to gather information about fishing activities and other factors that may affect consumption. The interviewer will read the questions in numeric order and complete the table in the questionnaire.

The first series of questions relate to the species, frequency, and quantities of fish eaten. If consumption varies with high and low-eating periods, questions will be asked for each period. Once the interviewer has verified whether the respondent ate fish during the previous 12 months, the interviewer will inquire about which type of species were eaten, the number of portions or frequency that each type was eaten, and typical portion sizes. Species and portion displays will be used.

Information will be gathered regarding parts of fish consumed, methods of preparation, and sources of fish consumed over the past 12 months. Information will also be gathered about activities associated with fish consumption, including special events, such as feasts and ceremonies, as well as fishing activities. Finally, several questions will attempt to gather more qualitative data on changes in fish consumption compared to the past and about intentions for fish-consumption in the future.

4.4.5 General Information

General information will be collected at the end of the primary in-person interview. Demographic information will be recorded, including the respondent's gender, date of birth, age, height, weight, residence on or off reservation, education level, and household income. These items are being collected to provide sub-groups for rate-reporting, to support calculations of rates in other formats (e.g., g/kg-day), or to attempt to identify characteristics of high vs. low consumers of fish. After the demographic

information is recorded, the interviewer will ask female respondents about their breastfeeding history (linkage to child health).

The interviewer will conclude the interview by reading the statements of appreciation, inquiring about future contact. At that point, the interviewer will record the end time (and calculated length) of the interview. Following the interview, the interviewer will record their opinion of the respondent's level of participation (cooperation and reliability) and acknowledge that they recorded the information truthfully and to the best of their ability by signing an attestation of authenticity.

4.4.6 Photographs and Portion Models

Portion models and graphics (photographs or other representations) will be used during the 24-hour recall and food frequency questionnaires and will be comparable to the U.S. Department of Agriculture (USDA) portion size booklet (and accompanying measuring implements) that is used by NHANES for national dietary surveys. These models will provide a visual display of quantities of fish consumed during each meal. These models will be reviewed and tested by the implementation team prior to survey interviews, and they will be evaluated for usefulness and appropriateness by the Tribes (and modified, if needed) during pilot testing of the questionnaire. The portion displays have not been fully evaluated by the survey team yet, but following are some general considerations in the selection and use of the final portion displays.

There may be a need to calibrate the portion displays to physical weights of the species represented and for each specific portion size shown in the display. Any portion displays should show the portions as actual (100%) size. If possible, the display should be shown to the respondent at a distance similar to the distance between a person and their meal, without being intrusive of personal space. This could usually be accomplished by handing the display to the respondent and asking them to indicate the particular portion mark within the display that corresponds to their consumption in response to a question.

All portion displays will have a specific code attached to them, and a separate table (to be used during data analysis) will show the volume and/or weight-per-species corresponding to each portion mark in the display. To maintain efficiency of the interview, the respondent will answer questions in terms of simple portion marks or codes on each display, saving the interviewer a table look-up for the species-specific weight of the noted portion.

Dishes such as stews, chowders, casseroles, and special composite dishes unique to the Sho-Ban will have their own portion models to indicate serving sizes. For example, measuring bowls will be used for respondents to identify portions of liquid dishes (with a fish ingredient list pre-determined). The survey team will identify the tribal-specific dishes (only those which include fish as a component) and obtain approximate recipes for conversion of visual portion sizes to weight of fish by species. Other composite dishes that are reported will be handled using standard recipes (such as that compiled by the EPA) to convert respondent-reported quantities consumed to weight of fish consumed.

4.4.7 In-House Testing and Revisions of Questionnaire

In order to create the most effective questionnaire, the research design team identified the information of interest and crafted an initial design that was modeled after other questionnaires from recent, similar studies. Survey research experts from Pacific Market Research reviewed the questionnaire, along with statistical and subject matter experts.

Prior to widespread implementation, the questionnaire will be administered and tested among team members for content and length. After passage of that test, the questionnaire will be administered to a small subset of the target population. Following this “pilot test,” sample respondents will be interviewed about their experience with the questionnaire, including:

- Was your overall impression of your interview experience positive or negative, and why?
- Which questions were challenging? If any were challenging, what might make them easier?
- Keeping in mind that the study topic is fish consumption, are there any questions that ought to have been asked but weren't?
- Are there any questions which seemed unnecessary?

Each step of the process allows for questionnaire revisions as appropriate. Significant revisions and/or additions to the questionnaire deserve further testing.

4.4.8 Pilot Testing of Questionnaire and Field Operations

The pilot test will cover most of the survey procedures, including screening, invitation and first contact, interview using the questionnaires (FFQ and 24-hour recall), field review and key entry. The persons selected for the pilot test will exercise all dimensions

of the questionnaire. It is likely that 15-20 persons, at least, will be needed for an adequate pilot test.

Questionnaires may be revised continuously while the pilot test is underway, but substantial revisions may require additional pilot interviews to test new questions or new wording and formats. The following characteristics of pilot test respondents (who will not be eligible for inclusion in subsequent sample selection) will be covered.

- Age: elders and younger members
- Gender: males and females
- Lifestyle: modern and traditional
- Fishing: fishers and non-fishers
- Source of fish: primarily eat at home vs. eat out frequently
- Income: low-income and high-income
- Food preparation: respondents who do and do not usually prepare food for the household

A pilot test respondent may cover more than one dimension. For example, elder fishers may contribute to understanding the questionnaire performance on both elders and fishers. However, other combinations of characteristics with an elder and with a fisher should also be tested. Additional pilot test participants may be added until the various dimensions have been fully covered. During the pilot test it is important to interview different types of respondents so that all iterations of the questionnaire can be addressed. The pilot test should include the anticipated final questionnaire as well as other tools related to it, such as portion size models and photographs.

4.5 IRB Approval

In order to meet accepted standards of protection for survey respondents, we will seek Institutional Review Board (IRB) approval of the survey design. We have identified Quorum Review IRB, a commercial IRB service, as a vendor for this purpose. The process consists of preparing a set of documents (see list below), working with the IRB for pre-review of the application, revising the application based on the pre-review, and then submitting the revised application for full review.

The following list provides an example of the documents needed for the IRB application; many forms and examples are available on the Quorum Review IRB website, at <http://www.quorumreview.com/forms/>.

- Submission forms, which include administrative details about the study, study locations, and study team.
- Study Protocol, including discussion of the purpose and benefits of the study, potential risks to the respondents, description of the study methods, selection criteria for respondents, and procedures to protect confidentiality.
- Curriculum vitae (CV) and other credentials of the Principal Investigator (PI). Only one PI is needed for the IRB application if that PI will be responsible for the protection of human subjects.
- Survey documents, including survey forms, consent forms, and any other written material which will be provided to respondents.

The goal of pre-review with the IRB prior to full submission is to improve the quality and completeness of the submission. Quorum Review provides a pre-review service for this purpose. The expected timeline for IRB approval is about 1 week from submission of all documents, depending on whether the pre-review identifies any issues. Since this survey is purely behavioral and risk to the study participants is minimal, we expect that it will qualify for expedited review.

4.6 EPA Human Subjects Review

In addition to IRB review and approval, the survey will need review and approval from the EPA Human Subjects Research Review Official (HSRRO). The process consists of submitting an application and supporting documents to the HSRRO. The IRB review and approval is one input to the HSRRO review process. The HSRRO has final authority for review of human subjects research supported by the EPA. The following documents are needed for submission to the HSRRO; additional documents may also be requested:

- Application memorandum using a template provided by the HSRRO, which includes a brief discussion of the value of the research, any risk to the subjects from the research, and the approach for subject selection and informed consent.
- Documents submitted to the IRB, including the study design and survey documents such as consent forms, survey forms, and recruitment material.
- Documents received from the IRB, such as review comments and letters of approval or exemption.

The HSRRO review process takes place after IRB approval and prior to commencement of the survey.

The EPA provides educational resources for investigators to clarify human subjects research policies, such as the online tutorial “Human Subjects Research at the Environmental Protection Agency: Ethical Standards and Regulatory Requirements” at http://www.epa.gov/osa/phre/phre_course/index.htm. The survey team will pursue and manage the human subjects approval process with EPA.

5.0 SURVEY OPERATIONS

This section describes the field operations, including interviewing and contacting participants, as well as pilot testing and key entry of the questionnaire.

5.1 Interviewing

This section describes the selection and training of individuals who will administer the survey interviews; procedures for conducting the interviews; scheduling, monitoring, and recording interviews; and proper handling of the questionnaires.

5.1.1 Interviewer Selection

Interviewing positions will be filled in collaboration with the Tribal authorities with agreement on selection by both parties. Once hired, the interviewers will report to the survey team. Ideally, the Tribes will recruit or propose two to three individuals for each interviewer position. Additionally, the survey team hopes that the Sho-Ban will promote participation in this study, both for respondents and interviewers. For those who apply for the interviewing position, a survey team staff member will explain the job duties; those whose qualifications appear promising will be invited to complete various skills and aptitude tests that cover:

- Education
 - High school diploma or GED
 - 9th grade reading level
 - Reading sample survey script: silently and aloud
 - Comprehension and clarity
- Clerical skills
 - Legible hand-writing
 - Spelling
 - Grammar
- Employment availability: part-time work for 9-12 months
- Transportation
- 18+ years old
- Courtesy and professionalism
- Ability to think “on one’s feet” and to adapt to changing conditions
- Good communication skills
- Reliability

- Ability to follow directions, as it is important that surveys be administered using a common, scripted approach to maximize objectivity and to enhance comparability of answers.

5.1.2 Interviewer Training

Interviewers will be trained to follow “best practices” when it comes to in-person interviews. This classroom component of the training is expected to last approximately 4-8 hours. It will begin with an overview of survey research, including a brief history of its utility and the importance of its role. The training will include general and specific interviewing techniques and skills. In addition to an explanation of the origin of this survey, interviewers will receive survey-related materials and information about the critical nature of the project. As part of the training, the survey staff will themselves need some instruction in practices that are acceptable to or unacceptable to Tribal respondents. These important cultural points will be included in the training.

Interviewers will be exposed to general survey research principles related to interviewing. Objective data collection will be emphasized, as will the need to listen closely to what the respondent says and record it accurately. Interviewers will learn how to probe, clarify and check open-ended answers to ensure that they’ve elicited and captured all relevant information from the respondent. Most importantly, interviewers will participate in a lengthy and in-depth mock interview session during which the interviewer works directly with a supervisor or another co-worker to try out the questionnaire and what they’ve learned. The supervisor will provide the interviewer with challenging but realistic answers to the questions.

Special attention will be devoted to cultural aspects which might prove challenging during verbatim administration of the questionnaire. For example, if a respondent does not understand a question, a typical interviewing technique is to repeat the question and to answer the respondent’s inquiries with, “I can’t interpret the question for you. It is whatever the question means to you.” If the pilot test uncovers survey items which are unclear, additional probes and prompts will be developed in order to minimize interviewer interpretations while in the field.

5.1.3 Procedure Manual and Training for Interviewers and Supervisors

All interviewers and supervisors will undergo a comprehensive training prior to beginning work on this project. The training will include basic and advanced topics necessary to successfully conduct in-person survey research. Below is an example agenda for the training sessions which would be required for all interviewing staff.

- Introduction of survey staff and implementation team
- Project background
- Overview of survey research
- Confidentiality requirements
 - Dealing with Personally Identifiable Information (PII)
 - What to do if you know the respondent
- Exploration of question types
 - Close-ended items
 - Numeric items
 - Scale items
 - Open-ended items
- Importance of precision and accuracy when recording answers
- Objective research: non-bias by interviewer
- Techniques to probe and clarify
- Building rapport with respondents
 - Being courteous and respectful
 - Addressing challenging respondents
 - Older
 - Hard-of-hearing
 - Angry
- Review of questionnaire
- Quality control measures
 - Self-monitoring
 - Supervisor/data entry controls
 - Call-backs and verification
 - Statistical tests
- Productivity targets
- Logistics related to appointments, survey administration, etc.
 - Reimbursement for expenses
 - Contact information for all staff

5.1.4 Scheduling and Monitoring Interviewers and Activities

The process for assigning in-person interviews will be administered by the survey team's scheduler, who, initially, will be an employee of Pacific Market Research—one of the three firms which will be carrying out the survey implementation work. The scheduler will work closely with the interviewers to ensure that the in-person interviews

are scheduled only during hours when the interviewers are available. Over time, some or all of the scheduling responsibility might be transferred to the interviewers with continued monitoring by the survey staff. Based on the estimated interview length, we anticipate that it will be possible for an interviewer to complete two interviews per day. This is expected to be the target quota for the interviewers, given the length of the interviews and activities associated with each interview. This depends on many factors, including the distance that the interviewer must travel, road conditions, and whether the respondents show up when agreed. We recommend setting a target of at least one half of all interviews being conducted at a central location on each reservation.

Consideration will be extended for respondents with mobility problems, ensuring that their responses are gathered even if they are homebound. Accounting for respondent availability and interviewer workload, interviews will be scheduled seven days a week starting as early as 8:00 a.m. with no interview beginning later than 8:00 p.m. To the extent possible, a primary goal is to minimize respondent burden; one way to do this is to offer an assortment of times and convenient locations for the interviews.

Any issues of calendar sensitivity (such as avoiding or minimizing interviews on Sundays or special occasions) will be addressed in conjunction with the Tribes prior to the commencement of interviewing. The survey implementation team will work with the Tribes to jointly design an initial approach to respondents that is consistent with the Tribes' way of carrying out activities and is also consistent with accepted scientific survey practice.

5.1.5 Recording Interviewer Responses

Interviewers will record interview answers on the hardcopy questionnaire. They will also record start date, the start time, the completion date, and the end time. Writing will be tidy and easily readable. Stray marks or mistakes will be corrected as necessary prior to handing off the completed questionnaire for data entry.

During data entry, the entry staff will review the questionnaires as they enter them. If the supervisor or the data entry personnel observe missing data or other problematic aspects with the questionnaire, it will be referred to the original interviewer for review and correction as appropriate.

5.1.6 Integrity and Handling of Questionnaire Hardcopy

The completed questionnaires will be protected by interviewers until the questionnaires have been delivered to the data entry staff or a secure holding area. Questionnaires

must not be left out where non-survey staff might gain access to them. Instead the questionnaires should be kept with the interviewer, within his/her physical control, or in a locked area prior to handing off to data entry.

5.2 Contact with Respondents

Respondents will first be contacted by mail and/or Tribal newsletter to introduce the project in general. Respondents will then be contacted by telephone, followed by a selection of those respondents who are willing to participate in the in-person interview(s).

5.2.1 Initial Contact by Mail and Telephone

Initial contact with respondents will be by letter or postcard, alerting respondents that the survey is forthcoming and that their opinions are important. Follow-up contact will occur via telephone (up to 15 call attempts before assigning a record as deceased or otherwise ineligible). During the telephone call, respondents will be screened for fish consumers versus non-fish consumers, and an attempt will be made to schedule an appointment for an in-person interview with fish consumers.

The implementer will coordinate with individual Tribes to identify motivating factors such as incentives or other valuable rewards for prospective respondents. EPA funds cannot be used for remuneration but we strongly recommend providing a token of gratitude in order to establish good will and boost the response rate. Without incentives there is danger of survey failure due to a low response rate. If the main motivation for the respondents in this project is a sense of altruism, it is all the more important that the interviewers are extremely assertive and persuasive in convincing prospective respondents to participate. In order for the survey to be successful, the Tribal leadership will need to play a central role in informing the Tribe about the survey and promoting cooperation with the survey.

When contacting respondents by telephone, some individuals are expected to refuse to participate. The initial counterpoint to a respondent refusal is to explain the importance of the respondent's opinions and experiences in the study, sharing with him/her how the results will benefit the Tribes and community. If he/she still refuses, the interviewer will put the number back in the system, allowing several days to pass before attempting the number again. Call-back conversion attempts are often handled by "conversion experts," different from the original interviewer, which may be applied as necessary. Interviewers will use standard survey research practices to try to convert initial refusals to cooperative participants.

5.2.2 In-Person Interviews

Data collection will take place either in the respondent's home or in a central, public location. Part of the goal of the research is to promote a feeling of confidence and good will among the prospective respondents in order to conduct as many completed interviews as possible. To this end, we recommend conducting the interview in a location where the respondent feels comfortable and safe. The interviewer will either meet the respondent in a mutually agreed location or go to the respondent's home. Background materials relevant to the survey will also be provided to the respondent in advance.

At each interview's conclusion, the interviewer will graciously thank the respondent for his/her time, reiterate the importance of the study results, and quickly review the questionnaire so that the interviewer may administer follow-up questions for any items which have missing information. To the extent possible, interviewers will record interview feedback from respondents. This includes praise and complaints from respondents. Feedback will be provided to the scheduler or the supervisor at the end of each day. Interviewers are required to provide the outcome or disposition of each interview attempt as soon as possible after the attempt or at the conclusion of each day, whichever comes first. The disposition will be recorded in a master database so that the result is available for immediate and later analysis.

5.2.3 Follow-up Call and Re-Interview

For quality control purposes, we recommend a follow-up call to every respondent. The follow-up call or verification call is intended to provide a double-check of the interview. Some respondents who receive a follow-up call will merely be asked whether they participated in the survey. But a sub-sample of the entire group will be asked to validate their data. By asking some of the same questions again, the researchers can test the reproducibility of the data. The questions will be selected to represent major sections of the questionnaire and will avoid questions with complex or long lead-in development.

5.3 Tribal Collaboration in Field Operations

It is recommended that a primary technical contact for survey operations be identified by the Tribes. This contact person will be responsible for collaborating with the survey implementation team, providing access to the Tribal facilities for conducting interviews, assisting with the logistics of contacting and following-up with survey participants, and keeping the Tribal leadership and membership informed of the status of the survey.

To create and roll out a successful survey, it is critical to obtain Tribal support initially, particularly Tribal leadership, and to develop and maintain the relationship and support throughout the project. From the implementation team this requires familiarity with quantitative survey research as well as cultural sensitivity. The implementation team must be available to the Tribal representatives to address any outstanding survey issues. Two-way communication is crucial.

5.4 Key Entry of Questionnaire, Validity Checks, and Storage

Data collection will be conducted with hard copies of the questionnaire. After the data have been recorded on the questionnaire, information will be keypunched or entered onto digital media. This provides an extra level of redundancy as well as, and more importantly, an automated method of organizing and eventually analyzing the data.

Many data entry software packages are available and they allow quick, efficient, reliable and secure data entry. Some of these include: SPSS Data Collection Data Entry, Voxco Interviewer Suite/Command Center, EpiData Software, SurveyAnalytics iPad Survey Tool, snap Surveys, Confirmit and even Excel. Pricing varies depending on the vendor and the type of solution, from many thousands of dollars to a nominal (or even no) fee for open source applications. Each software package has its benefits and drawbacks, but for this project we recommend SPSS Data Collection. For security purposes, sample files and data files shall be encrypted.

Best practices demand that data entry is verified. This can be accomplished by spot-checking randomly selected data points in every n^{th} interview or entering all responses for every n^{th} interview twice. The most reliable way to check the accuracy of the data entry is to perform 100% verification. This means that *all* data points for *every* interview are entered twice. We strongly recommend 100% verification.

To effect reliable data verification, two or more parties will be involved in the process. An initial keypunch operator enters the data for one interview; it is verified (re-entered) by a different keypunch operator. Each record or line of data related to the questionnaire is checked against its respective original record. If discrepancies are found, a supervisor or other staff member will review both of the electronic records and the hard copy of the questionnaire to determine which data entry point is correct. Error rates will be tracked among survey responses in general and also by cross-tabulating responses by various demographic or other information, and looking for anomalies or statistically significant differences.

5.4.1 Field Validity Checks and Re-interview

Of the many places where an error can be introduced into the data, the collection point is among the first. A typical way to test for interviewer errors is to re-contact some respondents and re-ask several questions. Due to the additional burden on respondents during this follow-up process, it's unrealistic to administer the entire interview again; instead a subset of questions may be asked to validate the data recorded by the interviewer. Not all respondents will be re-contacted. In the event that significant differences are found (between the originally recorded answers and the validation answers), the interview for that respondent will either be discarded or a new interviewer will be sent to administer the full questionnaire again. Each interviewer's work will be evaluated for consistency and accuracy. Selected questions will be re-asked of a selected sub sample.

5.4.2 Handling Missing Values

Missing survey data, whether because of survey design problems, interviewer error, respondent misunderstanding or simply refusal to answer questions, can be problematic for any project. Ideally there will be no missing data. In the event that a record is missing some of its data—and it is due to respondent-caused factors—there are several acceptable steps for adjusting the data to accommodate missing values. By using data analysis software we can impute new values where once the data were missing. That is, based on the values in other, similar cases, data can be pushed into the records which had missing data. The replacement data might be based on copying a value from a random case, mean substitution, regression, or multiple imputation. Generally, the most robust method is with multiple imputation; we recommend using multiple imputation for this project. This will be implemented during analysis.

5.4.3 Naming and storage of electronic files

Data files will be stored and named according to the specifications of the selected data entry software. Generally the file name suffix should be a concise but descriptive annotation of the file's contents and the date of last revision. For example, a data file created in Excel which holds information about the Sho-Ban should be named *fish_consumption_SBT_2014_04_23.xls*, where "fish_consumption" describes the study, "SBT" identifies the Tribe and "2014_04_23" is the date that the file was last modified. In most cases the file extension will depend on the data entry software. Some systems do not allow long file names. In this case, the file name will be shortened to convey as much information as possible without exceeding file-naming rules for the respective operating system.

5.4.4 Back-up and Transfer Protocols

Data back-ups shall be completed on a basic grandfather-father-son rotation schedule. Backups will be completed daily, weekly, and monthly. Media for daily back-ups are rotated daily, weekly back-ups are rotated weekly, and monthly back-ups are rotated monthly. For example, a back-up is completed each day. After the initial back-up, additional back-ups will be incremental (i.e., backing up only the files which have changed since the previous back-up).

The transfer of files which contain Personally Identifiable Information (PII) or Protected Health Information (PHI) shall be conducted via secure messaging or via a Secure File Transfer Protocol (SFTP) site. Sensitive data must not be transmitted via “regular” e-mail or other unsecured means.

5.5 Sensitive Information

During the administration of this survey, the Tribes will provide information about their membership. Some of this information is considered “sensitive information” and must be protected from disclosure. Sensitive information includes PII and PHI. Various laws and regulations affect the handling of PII and PHI.

5.6 Confidentiality and Data Management

Tribal Committees and the Tribal Office of Legal Council will be included in discussions and plans to maintain the confidentiality of the data during the survey operation. All survey staff will be required to sign a Proprietary Information Agreement and a Non-Disclosure form prior to gaining access to private or sensitive information and certainly before beginning work on the data collection. Appendix B provides an example of this type of form, which include confidentiality during the interviews and confidentiality of the survey results.

5.6.1 Confidentiality of Hardcopy and Electronic Files

Hardcopy questionnaires, with data on them, whether completed or not, must be stored in a secure location if they include PHI or PII. A secure location is an area that cannot be easily breached by the public or by non-authorized personnel. An example of a secure location is within a safe, a locked filing drawer or sometimes a locked office. However, a locked office is often insufficient as custodial staff or other workers might have access to the area.

Data files which contain PII or PHI shall be stored on secure password-protected devices. In this case a password-protected device is an electronic medium which

requires a unique username (not shared among users) and a strong password in order to access the file. The strong password should include a combination of alphanumeric characters, with uppercase and lowercase letters and numbers. The file should be encrypted using at least AES 256-bit security.

5.6.2 Communicating Confidentiality to Participants

Respondents will be informed in advance and again at the beginning of the interview that their survey responses will remain confidential and that all research results will be reported in an aggregate manner. No individually-identifiable data or answers will be shared with anybody outside of the survey staff. The respondents will be assured that they can safely and honestly answer the questions, since they will remain anonymous after completion of the interview. Respondents will be advised that a Freedom of Information Act (FOIA) request might nullify the study sponsor's promise of confidentiality. However, the usefulness of the data, on an individual level is dubious: a FOIA request is unlikely to affect divulgence of individual information.

The EPA and the Sho-Ban have yet to agree on and sign confidentiality agreements; communication to the respondents will be specified (and reviewed by the Tribes) after such agreements are in place. The survey will not proceed on administering any interviews with tribal members until confidentiality agreements are in place between the Sho-Ban and EPA and the survey has received both IRB and EPA Human Subjects approval.

6.0 ANALYSIS, REPORTING, CLOSE-OUT OF STUDY

This section discusses the methods for analyzing data collected from the FFQ and 24-hour dietary recall surveys, as well as final reporting and completion of the study.

6.1 Analysis of FFQ results

The data collected from the FFQ will enable a fish consumption rate (g/day) to be determined for each sampled individual. For an individual, the rate can be determined for each species or species group (anadromous, resident freshwater, and marine). Briefly, an annual amount consumed arising from consumption in a particular season can be calculated per species from the typical portion size (grams) consumed for that species multiplied by the frequency of consumption, then multiplied by the duration of the season (or period). The sum of this total seasonal quantity for the two seasons yields an annual quantity. Secondly, the amount consumed (grams) in ceremonial or special events can be calculated from the typical consumption amount at those events multiplied by the number of such events attended per year by the individual. This can be added to the total amount for two seasons to yield a total consumption for a year. Division by 365.24 days (taking into account leap years) will yield a daily amount in grams per day for the given species. The daily consumption rate for a species group can be calculated for an individual by summing the daily rates for the individual species included in the group. Some selected analyses can be carried out to express consumption rates in grams per kilogram of body weight per day (g/kg-day),¹⁰ since some consumption studies report rates in these units.

The computation of means, medians and other percentiles will need to take into account the stratification and weighting used in the sampling, as well as any correlation among respondents' data introduced by the occurrence of two sampled adults in the same household.

Quantities reported for the Sho-Ban should be accompanied by appropriate indications of uncertainty and, where applicable, an estimate of variation across individuals. All means reported for fish consumption rates or for other variables should be accompanied by standard deviations along with a notation of the weighted and unweighted sample size underlying the calculation. Other estimated quantities (aside from means), such as percentiles of the fish consumption distribution, should be

¹⁰ Body weight data will be collected with general demographic information during the in-person interviews

reported with standard errors and, for rates that are likely to be considered for setting water quality standards or other regulatory actions, the estimate should be accompanied by 95% confidence intervals. Again, for percentiles and other quantitative estimates, the underlying weighted and unweighted sample size should be noted.

There are several methods available for computing percentiles of an empirical distribution. See Hyndman and Fan (1996), for a discussion of the different methods. The design team recommends the calculation of type 7 percentiles, as noted in the Hyndman article.

A number of other quantities and responses are collected in relation to the FFQ. These quantities will consist of continuous variables (such as age) and categorical variables (such as gender or education). The continuous variables can be summarized by means (and medians if there are highly skewed distributions), standard deviations, minimum and maximum values and, if appropriate, standard errors. Categorical variables can be summarized by percentages per category. The total sample size underlying each set of summary statistics for variables should also be shown.

Confidence intervals (95% level) for the various statistics can be calculated by several methods. The choice of method depends heavily on the distribution of the values used to calculate the statistics and on the sample size. For the larger sample sizes (e.g., over 100), the nonparametric Bootstrap will usually work well for the mean, median and percentiles near the median, but other methods may be needed for the higher percentiles. (The Bootstrap method will need to be adapted to the particular weighting and stratification scheme used for the Sho-Ban.) Experiments with the Bootstrap for 95% confidence intervals for various percentiles or the mean from random samples from a lognormal distribution show less than 95% coverage for samples sizes of the magnitude discussed in this report. For the 90th and 95th percentiles (and possibly other nearby percentiles), non-parametric confidence intervals can be based on the ranking method described by Hollander and Wolfe (1999).

Alternatively, if the distribution appears close to the lognormal or another distribution that can be specified in closed form, the parametric bootstrap can be used. For example, a lognormal distribution can be fitted to the data (taking account of weighting) and the bootstrap algorithm can be applied to calculate percentiles for samples drawn from the fitted distribution, again taking account of weighting and stratification. In fitting a distribution to the data, another method that may be useful is to fit a broken-stick

spline to the Q-Q plot (using normal distribution quantiles). The parametric bootstrap can then be carried out with the fitted distribution.

6.2 Analysis of 24-hour Recalls

The 24-hour recall data will be analyzed using the “NCI method.” An example of analysis of fish consumption data using the NCI method, along with a heuristic description of the method can be found in Polissar, et al., 2012. Dr. Kevin Dodd of the NCI, one of the developers of the method, has offered to assist in implementation of the method for the Idaho Tribes. The implementation team statistician will be in touch with Dr. Dodd to carry out this work. Helpful references for this method can be found in Tooze, et al., 2006; Dodd, et al., 2006; and Kipnis, et al., 2009. An excellent series of webinars, including a talk and materials by Dr. Janet Tooze on the NCI method, are available at <http://riskfactor.cancer.gov/measurementerror/>. The SAS software for the method is available from Dr. Dodd at NCI and it will need to be adapted to this specific survey methodology. Confidence intervals are not provided by the methodology, but they may be computed by some potentially computationally extensive methods.

As noted previously, there may not be a sufficient sample size of respondents with two fish consumption days from the two 24-hour recall interviews to support the NCI method for the Sho-Ban Tribes considered alone. In that case it may be possible to estimate fish consumption rates for the Sho-Ban Tribes by pooling data with other Tribes (for this purpose alone) and then using a covariate or covariates to generate a unique Sho-Ban distribution of consumption rates. The covariate might be either a tribal indicator variable or else the respondent-specific consumption rate from the food frequency questionnaire.

6.3 Reporting of Results

The results of this survey are likely to be used for years ahead, if not decades, therefore a very complete report should be prepared. Some of the tribal fish consumption surveys in the Pacific Northwest continue to be used for environmental regulation more than 20 years after their completion. This survey will likely also have that long-term utility.

In addition to the report describing the methods and results of the survey, the implementation team may also prepare a short procedural history of the survey, including lessons learned and changes in design made during the survey operation. Such a report will help users of the results to understand the context of data collection more thoroughly.

The suggested format for the report on suppression and quantitative rates is the commonly used sequence of:

- Executive summary
- Introduction (including background and motivation)
- Methods (including methods for survey design, survey operations and statistical methods for data analysis—for both the suppression study and the current consumption survey)
- Results (extensive tables and displays along with textual commentary) on the suppression study and the current consumption survey
- Discussion (including main findings, comparison of the rates from the FFQ and the NCI method, strengths, weaknesses, remaining uncertainty, potential applications of the results in water quality regulation and conclusions)
- References
- Appendices (including more detailed tables than presented in the body of the report, technical notes, and other supporting material)
- Acknowledgments (thanking, in particular, tribal council, tribal respondents and tribal staff)

The suppression study will fit into this framework as well, as part and parcel of the report. There have been many studies of historic rates and suppression in the past, but their isolation from a report on current rates may have denied them the attention they deserve. The primary quantitative results from the suppression study are likely to be mean (average) consumption per day with a plausible range bracketing the mean. To the extent possible, the rates will be categorized by broad species groups.

The methods section of the report can include plain-language description of methods, but highly technical material should be placed in the appendices. This should be a report whose main body is very readable by Tribal leaders and managers, environmental scientists, political leaders, regulatory staff, and by anyone with previous exposure to the topic.

The main results such as the mean, median, and percentiles of fish consumption for all species combined and for various species groups can be presented in tabular and graphical format in the main body of the report. The various rates can be presented for age, gender, income and educational attainment groups, but more detailed tables (e.g., with more percentiles, more sub-divided groups, and with confidence intervals) can be

presented in the appendices. The implementation team should keep in touch with the team conducting the surveys for the State of Idaho and attempt to include tables in the report that have comparable species and demographic groups as the main tables of the State surveys.

The State of Idaho will be surveying anglers (in addition to their survey of the general population) and the Sho-Ban's report can also report on Tribal anglers who are sampled within the survey process. The anglers may be defined by, for example, having fished at least a certain number of times during a defined period (using questions included in the in-person interview). The extent of results reported for anglers will depend on the number of anglers encountered.

6.4 Peer Review

The design team recommends that a technical peer review panel be convened. The topic of fish consumption rates is controversial, and there are always opportunities for mistakes in a survey as large and complex as this one. The panel may consist of an environmental scientist familiar with issues in fisheries and fish consumption, a PhD-level statistician familiar with surveys, a scientist familiar with reconstruction of heritage consumption rates, and a support or reference person who is familiar with the use of FCRs for environmental regulation.

6.5 Archiving, Ownership, Sharing of Data

The EPA management staff for this project will be communicating with the Idaho Tribes, with this design team, and with other EPA staff to develop a globally satisfactory policy for confidentiality and ownership of, access to, and potential sharing of the data developed from this survey. The design team has provided input on this process and various issues related to this topic. The formal agreement on ownership of current and future access to the survey electronic and hardcopy data will be an agreement between EPA and the Tribes, it is anticipated. A survey team representative(s) may also be a signer – in the role of one implementing parts of the agreement. The survey team will request to review and comment on any proposed agreements to ensure that there is compatibility between the agreements and survey operations, planned data analysis, and final reporting.

Undoubtedly the results of this survey will be a precious resource for the Tribes and others, documenting the status of fish consumption and factors affecting it both historically and at this time. Future aspirations for fish consumption are also covered.

Given the present and future importance of the survey results, it will be important to archive the material carefully. The quantitative data should be saved in electronic system and text files, accompanied by data dictionaries, including the name of each variable (field), its definition and meaning, file position and width, and codes used with a definition of each code. At least two copies of the files should be kept on external media and the two or more sets of files should be maintained in widely separate locations to avoid common loss in case of a disaster. At least annually (signaled by a tickler file) a copy should be made of each set of files (and verified) to avoid loss through physical deterioration of media. As storage modes change over time (e.g., the past transition from tape to disc), the storage mode of the survey files should be kept up to date.

7.0 DESIGN TEAM, ACKNOWLEDGEMENTS, AND RESOURCES

The survey design team coordinated with the Idaho Tribes, EPA, and the State of Idaho to develop this survey design. Various resources were compiled and reviewed as much as possible to support design development.

7.1 Names and affiliation

The survey design was conducted as a collaboration between The Mountain-Whisper-Light Statistics (TMWL) and RIDOLFI Inc., with support from Pacific Market Research (PMR), and consisted of the following key team members:

- Dr. Nayak Polissar of TMWL
- Dr. Derek Stanford of TMWL
- Callie Ridolfi of RIDOLFI Inc.
- William Beckley of RIDOLFI Inc.
- Kristin Callahan of RIDOLFI Inc.
- Anthony Salisbury of PMR

7.2 Acknowledgements

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- Glenn Fisher, Fort Hall Business Council (Council) Vice Chair
- LeeJuan Tyler, Council Secretary
- Devon Boyer, Council Sergeant-At-Arms
- Darrell Dixey, Council member
- Blaine Edmo, Council member
- Chad Colter, Fish and Wildlife (F&W) Director
- Else Teton, Water Resources
- Candon Tanaka, Water Quality (WQ) Specialist
- Lori Tardy, WQ Environmental Scientist
- Dan Christopherson, F&W Program Manager
- Danny Stone F&W Policy Analyst
- Terry Racehorse, Enrollment Supervisor

7.3 Resources

A list of resources pertinent to developing and implementing a FCR survey is presented below, including agency guidance documents, existing surveys and methodology reports, and traditional lifeways and suppression studies. These resources, in addition to the references cited within this design report (Section 8), will provide additional guidance, background information, and research to support implementation of the survey.

7.3.1 Guidance, Regulations, and Other Agency Reports

Idaho Department of Health and Welfare (IDHW). 2013. *Eat Fish, Be Smart, Choose Wisely, A guide to Safe Fish Consumption for Fish Caught in Idaho Waters*. Bureau of Community and Environmental Health.

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APPENDIX A
Survey Questionnaire

(Under separate cover)

APPENDIX B
Example Confidentiality Form

PROPRIETARY INFORMATION AGREEMENT

In consideration of my employment with Pacific Market Research ("PMR"), I agree to the following:

1. Maintaining Confidential Information

(a) Company Information. I agree at all times during the term of my employment, and thereafter, to hold in strictest confidence, and not to use, except for the benefit of PMR, nor to disclose to any person, firm, or corporation without written authorization of an officer of PMR, any trade secrets, copyrightable works, confidential knowledge, data, or other information of PMR. By way of illustration and not limitation, such proprietary information shall include information relating to products, processes, know-how, diagrams, drawings, formulas, test data, methods, developmental or experimental work, improvements, discoveries, plans for research, new products, marketing/sales and business plans, budgets, and unpublished financial statements, licenses, prices and costs, suppliers and customers, and information regarding the skills and compensation of other employees of PMR.

(b) Former Employer Information. I agree that I will not improperly use or disclose any proprietary information or trade secrets of any former or concurrent employer or other person or entity with which I have an agreement or duty to keep in confidence information acquired by me in confidence, if any, and that I will not bring onto the premises of PMR unpublished documents or proprietary information belonging to any such employer, person or entity unless consented to in writing by such employer, person or entity.

(c) Third Party Information. I recognize that PMR may have received and in the future may receive from third parties their confidential or proprietary information subject to a duty on PMR's part to maintain the confidentiality of such information and to use it only for certain limited purposes. I agree to hold all such confidential or proprietary information in the strictest confidence and not to disclose it to any person, firm, or corporation, nor to use it except as necessary in carrying out my work for PMR or such third party consistent with PMR's agreement with such third party, unless expressly authorized to act otherwise by an officer of PMR.

2. PMR's Property Rights

Any copyrightable materials developed as part of the tasks performed pursuant to my employment with PMR (the "Work") shall be considered a work made for hire, and PMR shall be considered the "author," within the Copyright Act, 17 U.S.C. Paragraph 26. PMR shall have absolute and exclusive rights to all materials written or supplied by me as part of my employment, including the right to register a claim of copyright in the Work or any portion or modification thereof, including copyright renewals; the right to refer, make use of, or modify, said material or work; and the right to my name in that effort. I agree to execute and deliver any instruments or documents which PMR in its discretion deems necessary to establish, maintain, or defend its rights in said Work. In the event, for any reason, the Work does not constitute a work-made-for-hire, I, by my signature below, hereby assign to PMR all copyrights in the Work throughout the world, including all rights to renew such copyrights. Any manuscripts, notes, drafts, sketches, photographic negatives and prints, original paintings and drawings, computer programs, or other materials produced in relation to the Work, as well as the final product of the Work, shall be the sole property of PMR.

3. Returning Company Documents

I agree that, at the time of leaving the employ of PMR, I will deliver to PMR (and will not keep in my possession, recreate or deliver to anyone else) any and all devices, records, data, notes, reports, proposals, lists, correspondence, specifications, drawings, diagrams, materials, equipment, other documents or property, or reproductions (in whatever medium recorded) of any aforementioned items developed by me pursuant to my employment with PMR or otherwise belonging to PMR, its successors or assigns. I further agree that any property situated on PMR's premises and owned by PMR, including disks and other storage media, filing cabinets or other work areas, is subject to inspection by PMR personnel at any time with or without notice. Prior to leaving, I will cooperate with PMR in completing and signing PMR's Termination Certification.

4. Other Obligations

I acknowledge that PMR from time to time may have agreements with other persons or with the U.S. Government, or agencies thereof, which impose obligations or restrictions on PMR regarding the confidential nature of such work. I agree to be bound by all such obligations and restrictions and to take all action necessary to discharge the obligations of PMR thereunder.

5. No Conflicting Obligations

I represent that my performance of all the terms of this Agreement, and as an employee of PMR, does not and will not breach any agreement to keep in confidence information acquired by me in confidence of in trust prior to my employment with PMR. I have not entered into, and I agree I will not enter into, any agreement either written or oral in conflict herewith.

6. Notification of New Employers

In the event that I leave the employ of PMR, I hereby consent to the notification of my new employer of my rights and obligations under this Agreement.

7. Equitable Remedies

Because my services are personal and unique and because I may have access to and become acquainted with the proprietary information of PMR, PMR shall have the right to enforce this Agreement and any of its provisions by injunction, specific performance or other equitable relief, without bond and without prejudice to any other rights and remedies that PMR may have for breach of this Agreement.

8. Modification

This Agreement may not be changed, modified, released, discharged, abandoned, or otherwise amended, in whole or in part, except by an instrument in writing, signed by me and PMR. Any subsequent change or changes in my duties or compensation will not affect the validity or scope of this Agreement.

9. Entire Agreement and Supersession of Agreements

I acknowledge receipt of this Agreement, and agree that with respect to the subject matter hereof it is my entire agreement with PMR, superseding any previous and contemporaneous oral or written communications, representations, understandings, or agreements relating to its subject matter with PMR or any officer or representative thereof.

10. Not an Employment Contract

I understand and agree that this is not an employment agreement and that nothing in this Agreement shall confer any right with respect to continuation of my employment by PMR. I further understand and acknowledge that my employment with PMR is "At Will," and that either I or PMR may terminate my employment with or without cause at any time.

11. Severability

In the event that any paragraph or provision of the Agreement shall be held to be illegal or unenforceable, such paragraph or provision shall be severed from this Agreement and the entire Agreement shall not fail on account thereof, but shall otherwise remain in full force and effect.

12. Successors and Assigns

This Agreement shall be binding upon my heirs, executors, administrators, or other legal representatives and is for the benefit of PMR, its successors and assigns.

13. Governing Law and Consent to Personal Jurisdiction

This Agreement will be governed by and construed in accordance with the laws of the State of Washington, excluding conflicts of laws and principles. I hereby expressly consent to the personal jurisdiction of the state and federal courts located in Washington for any lawsuit filed there against me by PMR arising from or relating to this Agreement.

14. Survival

The provisions of this Agreement shall survive the termination of my employment and the assignment of this Agreement by PMR to any successor in interest or other assignee.

15. Waiver

No waiver by PMR of any breach of this Agreement shall be a waiver of any preceding or succeeding breach. No waiver by PMR of any right under this Agreement shall be construed as a waiver of any other right. PMR shall not be required to give notice to enforce strict adherence to all terms of this Agreement.

16. Notice

Any notices required or permitted hereunder shall be given to the appropriate party at the address specified below or at such other address as the party shall specify in writing. Such notice shall be deemed given up personal delivery, or sent by certified or registered mail, postage prepaid, three (3) days after the date of mailing.

This Agreement shall be effective as of the first day of my employment with PMR.

I HAVE READ THIS AGREEMENT CAREFULLY AND UNDERSTAND ITS TERMS.

Signature of Employee

Date

Name (typed or printed)

Home Address

Home Telephone

DATA SECURITY POLICY

For some clients, we are given access to highly sensitive data (e.g., taxpayer information). It is PMR's policy to prevent unauthorized use or disclosure of such information. To that end, PMR implements a variety of security measures designed to protect highly sensitive client data. All PMR employees are required to follow all security measures.

PMR's security measures include:

- Front office staffing whenever the front door is unlocked;
- Locked back entrances to PMR's offices;
- Use and storage of highly sensitive data in the Secured Suites, a restricted-access, secured area within PMR's offices;
- Authorization for access to highly sensitive data by PMR's Managing Director;
- Authorization for physical access to the Secured Suites;
- No authorized remote access of highly sensitive data;

- Creation and deletion of user IDs and passwords for access to the Secured directory;
- Logging of receipt and transmission of highly sensitive data;
- Testing physical and electronic security systems;
- Authentication logs for electronic access to the Secured Suites; and
- Annual testing and logging of physical and electronic security.

In addition, some clients require that additional security measures be implemented to protect their data (e.g., background checks on authorized staff). You will be notified of any of those measures at the time you are given access to such data, and will be expected to comply.

If you think unauthorized use or disclosure of highly sensitive data has occurred, notify the Human Resources Director immediately.