

There are global sources AND reservoirs of DDT and PCBs in the oceans' food chain and in ocean sediment as the production and use of DDT and PCBs have not been universally banned globally. The major portion of the life cycle of Pacific Salmon is spent outside Oregon waters. PCB and DDT manufactured and used "off-shore" produce "hot-spots" scattered around the world to which migratory species like Pacific Salmon are exposed. In time, with the elimination of off-shore sources combined with the painfully slow rate environmental degradation of these chemicals, eventually their concentrations in Pacific Salmon and other marine species will decline.

The abstract of (Johnson a,b) juvenile Chinook Salmon study states PCB and DDT were found in their digestive tracks, not in other tissues.. Because juvenile salmon spend time going in and out of the estuary until they have matured enough to survive the in ocean it is very possible as this study suggests, that the toxins were digested after entering the estuary where Oregon's freshwater and the ocean are mixed.

The concentration levels of PCB and DDT in Oregon's fish and wildlife HAVE declined over the decades since the elimination of their use in the United States and will continue to decline with or without the higher consumption rate and higher water quality standards.

Including the Pacific Salmon and other marine species in the new fish consumption rate used in the Oregon Water Quality criteria is not supported by science and represents an ineffective and inappropriate change. That is probably the reason why EPA recommended NOT including Pacific Salmon and marine species consumption rates in the Oregon water quality criteria. It is also why higher water quality criteria will not provide additional protection to the people eating Pacific Salmon for subsistence.

Additional studies should be undertaken to determine if juvenile salmon are contaminated before they reach the estuary. While the higher consumption rate may be justified to generate health advisories, using it for inland water quality criteria calculations is premature.

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