



October 31, 2007

Mr. Jason Heath
Manager of Water Monitoring, Assessment & Standards
Ohio River Valley Water Sanitation Commission
5735 Kellogg Avenue
Cincinnati, OH 45228

RE: Comments of the Kentucky Waterways Alliance and West Virginia Rivers Coalition on Responsive Management's Draft Work Plan and Survey Instrument "A Study of Ohio River Contact Recreational Use, Characteristics of Contact Recreational Use, and Site-Specific Fish Consumption Rates"

Dear Mr. Heath:

The Kentucky Waterways Alliance (KWA) and West Virginia Rivers Coalition (WVRC) submit the following comments concerning Responsive Management's draft Work Plan and Survey Instrument, "A Study of Ohio River Contact Recreational Use, Characteristics of Contact Recreational Use, and Site-Specific Fish Consumption Rates." We believe any study sanctioned by the Ohio River Valley Water Sanitation Commission (ORSANCO) to determine recreational use and fish consumption trends on the Ohio River, for the purpose of further considering the implementation of wet weather standards, should exceed scientifically defensible arguments and accurately portray the public's utilization of the river.

According to ORSANCO's Pollution Control Standards, "The Ohio River, as hereinbefore defined, has been designated by the Compact as available for safe and satisfactory use as public and industrial water supplies after reasonable treatment, suitable for recreational usage, capable of maintaining fish and other aquatic life, and adaptable to such other uses as may be legitimate."

We believe a successful survey will demonstrate water contact recreation and fish consumption are occurring regularly and unpredictably on the Ohio River.

Sampling Methodology - Telephone Survey

- **Responsive Management should be required to produce an appropriate number of completed surveys soliciting all of the proposed questions under the Contact Recreational Use of the Ohio River and Fish Consumption sections of the proposed Survey Instrument.**

We believe Responsive Management's proposed plan for delivering 5000 completed telephone surveys will not provide an accurate determination of recreational use and/or fish consumption rates on the Ohio River.

Considering more than 25 million people live within the Ohio River Basin, the survey will only attempt to capture the responses of .02% of the population.

Under the proposed Survey Instrument, we are concerned that a completed survey will be recorded if a respondent answers "No" to the qualifying questions under the "Contact Recreational Use of the Ohio River" and "Fish Consumption" sections, and further completes the "Demographic Data" section.

Additionally, it is also our concern that respondents answering "Yes" to either/both of the above-mentioned qualifying questions, but not completing all the survey questions because of survey length or other reasons, will result in an incomplete survey and not count toward the 5000 total.

As a result of the proposed study conditions, we believe a situation exists that will skew survey results toward respondents who did not participate in activities on or in the Ohio River in the past 12 months, or who have not eaten fish caught in the Ohio River in the past 12 months. In other words, it is less time-consuming, and thus easier, to get a qualifying "No" response than a qualifying "Yes" response.

Not requiring Responsive Management to acquire and deliver an appropriately pre-determined percentage of completed telephone surveys, for respondents answering "Yes" and/or "No" to qualifying questions, will produce questionable results and potentially portray unrealistic conclusions about recreational use and fish consumption on the Ohio River.

Further, a lack of an appropriate number of completed surveys (i.e. those not answering all of the proposed questions under the "Contact Recreational Use of the Ohio River" and "Fish Consumption" sections of the proposed Survey Instrument) will not only skew initial data from the telephone surveys, but also bias the sampling plan for the Intercept Survey and Site Observation.

- **The Survey Instrument should include questions directly relating to recreational use of the Ohio River during or immediately following a wet weather event.**

The question, "Did anything cause you not to participate in these activities on or in the Ohio River as much as you would like in the past 12 months?" does not attempt to address the primary issues relating to recreational use of the Ohio River and wet weather. Respondents would not be likely to even

consider that this question is attempting to quantify recreational trends as they relate to weather. Additionally, the question, as currently stated, will quantify if wet weather causes people to use the river less frequently. If the purpose of the survey is further consideration of implementing wet weather standards, the Survey Instrument's questions should attempt to extrapolate whether or not the public utilizes the river during or immediately following a wet weather event.

Sampling Methodology - Intercept Survey & Site Observation

- **The proposed Intercept Survey is inadequate and should provide specific methodology details prior to the Telephone Survey's commencement.**

Because Responsive Management is proposing to design the Intercept Survey and Site Observation based entirely on the results of the Telephone Survey, the sampling plan for the Intercept Survey and Site Observation should be provided prior to the commencement of the Telephone Survey.

Determining Total Contact Recreational Use of the Ohio River

- **The "river use equation" is an unscientific and invalid characterization of Total Contact Recreation Use of the Ohio River.**

Because we believe the results of the Telephone Survey will not accurately depict contact recreational uses and fish consumption rates of the Ohio River, we conclude Responsive Management will **not** be able to accurately estimate how many residents participate in contact recreational use of the Ohio River, especially during and after wet weather events, the time periods during which ORSANCO should be most concerned.

Recommendation

- **Responsive Management and/or ORSANCO should consider and accept voluntary testimonials in order to accurately assess contact recreational uses and fish consumption rates of the Ohio River.**

In order for Responsive Management and/or ORSANCO to properly quantify the current and potential contact recreational uses and fish consumption rates of the Ohio River, the public should be given an opportunity to provide testimonials for the official record. An accurate and complete representation requires targeting and soliciting members of the public who are directly involved in recreation and fish consumption activities, such as marina and boat owners, boating/paddling clubs, fishing clubs/tournaments, waterfowl hunters, amateur and professional athletes, and festival organizers. We urge ORSANCO to seek a representative collection of these parties and initiate an opportunity for them to complete a survey. Additionally, popular and well-known Ohio River access points should be targeted to capture opinions of the general public, who are not included in any of the aforementioned groups.

As currently proposed, the Kentucky Waterways Alliance and West Virginia Rivers Coalition find Responsive Management’s Draft Work Plan and Survey Instrument, “A Study of Ohio River Contact Recreational Use, Characteristics of Contact Recreational Use, and Site-Specific Fish Consumption Rates,” ineffective for providing a realistic and statistical determination of recreational uses and fish consumption rates of the Ohio River. We recommend a revision of the proposed Survey Instrument and/or the creation of an alternative survey tool to quantify a realistic depiction of Ohio River recreation and fish consumption activities.

Thank you for considering our comments.

Respectfully Submitted,

Jason Flickner
Water Resources Program Director
Kentucky Waterways Alliance

Adam H. Webster
Adam Webster
Acting Executive Director
West Virginia Rivers Coalition