Submitted to:  paula.wilson@deq.idaho.gov

November 5, 2015

Paula Wilson
IDEQ State Office
Attorney General's Office
1410 N. Hilton
Boise, ID 83706

RE: Docket No. 58-0102-1201 - Negotiated Rulemaking Fish Consumption Rule

Dear Ms. Wilson:

Northwest Pulp & Paper Association (NWPPA) appreciates the opportunity to offer comments on the Idaho Department of Environmental Quality’s (IDEQ) negotiated rulemaking for Docket 58-0102-1201.

NWPPA is a 59 year-old regional trade association representing 13 member companies and 16 pulp and paper mills in Washington, Oregon and Idaho. NWPPA represents the Lewiston pulp and paper mill operated by Clearwater Paper. Our members produce over 8 million tons of paper products each year and provide approximately 12,000 predominantly union-backed jobs that pay an average of more than $75,000 a year, plus benefits. As one of the largest members of Washington’s forest products sector (including private forest lands, sawmills, furniture, wholesaling and ports), pulp and paper mills contribute to a total of approximately 40,000 direct jobs and 107,500 direct, indirect and induced jobs. Because many NWPPA members are located in economically stressed rural communities, these family-wage manufacturing jobs help sustain the local economy, with each mill supporting three to five additional jobs in the community.

On behalf of our members, NWPPA routinely participates in the development water quality standard rules in the Northwest and has also participated in Idaho’s proceedings.

NWPPA’s overarching comment reflects our Association’s long-term policy position on the development of water quality standards. NWPPA’s policy is that numeric and narrative water quality criteria must be based on the best available science while being achievable and reasonable interpretations of federal guidance leading to net environmental improvement on the ground for our Northwest waters and the people who rely on those waters.
NWPPA’s specific concerns with the human health water quality standard rulemaking proposal are addressed in the comments of Clearwater Paper, the American Forest and Paper Association and the Federal Water Quality Coalition. NWPPA fully supports their comments.

NWPPA would like to emphasize Clearwater Paper’s comments on risk policy and reiterate that we also believe the Department should reassess their risk policy choices on carcinogens and non-carcinogens based on the recommendations of Clearwater.

NWPPA thanks the IDEQ and the Attorney General’s office for the opportunity to comment on this important matter. I can be contacted at 360-529-8638 to answer any questions.

Sincerely,

Christian McCabe, J.D.
Executive Director
Northwest Pulp and Paper Association