



Northwest Pulp & Paper Association  
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VIA E-MAIL: [paula.wilson@deq.idaho.gov](mailto:paula.wilson@deq.idaho.gov)

November 7, 2012

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

**RE: Docket No. 58-0102-1201 - Negotiated Rulemaking  
6 Fish Consumption Surveys**

Dear Ms. Wilson:

The Northwest Pulp & Paper Association (NWPPA) is a 58-year old regional trade association comprised of pulp and/or paper manufacturing facilities in Idaho, Washington and Oregon. In Idaho, Clearwater Paper is a NWPPA member. NWPPA routinely represents our members on environmental regulatory matters in state legislatures, state agency rulemakings and public policy forums. We have participated extensively in public forums and state agency rulemakings on the development of water quality standards for the last 25 years. We work with both our members and other associations/coalitions to bring science-based factual information to environmental rulemaking processes.

NWPPA participated in your October 4th workshop and wishes to submit our comments for your consideration on the relevance of the six fish consumption surveys noted in your PowerPoint presentation in deriving Idaho human health toxic water quality standards.

#### **NWPPA Comments**

1. NWPPA urges that the negotiated rulemaking process to carefully consider both scientific and policy considerations in the development of human health toxics water quality standards as we noted in our October 2012 comments – within the flexibility provided by U.S. EPA guidance.
2. Fish consumption surveys used for setting statewide water quality standards should be science based. Any survey should include statewide general populations and include accurate, seasonal, timely and peer reviewed data from life-long resident native species landed within the state – with data that have good quality assurance and quality control.
3. NWPPA agrees with the scientific reviews of the six fish consumption surveys noted in Comment 4 – for this particular use of developing Idaho-specific, statewide, human health water quality standards.

4. NWPPA supports both the policy and technical review comments submitted by:
  - a. Clearwater Paper including Exponent,
  - b. J.R. Simplot including Arcadis, and the
  - c. Idaho Association of Commerce and Industry.
5. NWPPA wishes to highlight our support of Appendix A of the Arcadis comments titled, *Key Components of a Fish Consumption Rate Survey for the State of Idaho*. NWPPA believes that a fish consumption rate from an appropriate and scientifically conducted fish consumption survey is one of *many* factors that should be considered for developing appropriate and protective human health toxic water quality standards. Any future Idaho fish consumption survey should include all the important science-based factors listed in Appendix A.
6. Finally, NWPPA urges that any possible future Idaho fish consumption survey – used to set a statewide water quality standard – should absolutely include and account for the general population of the State of Idaho. NWPPA believes this shortcoming of the six surveys highlights the need for additional survey work.

Thank you for the opportunity to comment on Idaho's Negotiated Rulemaking process and also to participate in your public workshops. We look forward to participating in the State of Idaho processes. I can be contacted at 503-844-9540 or [Kathryn@nwpulpaper.org](mailto:Kathryn@nwpulpaper.org) and Chris McCabe can be contacted at 360-951-1306 or [Chris@nwpulpaper.org](mailto:Chris@nwpulpaper.org).

Sincerely,

Kathryn VanNatta  
Director of Governmental and Regulatory Affairs  
Northwest Pulp and Paper Association