



September 25, 2013

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

Clearwater Paper Corporation
601 West Riverside, Suite 1100
Spokane, WA 99201

**RE: Docket No. 58-0102-1201 - Negotiated Rulemaking
Idaho's Fish Consumption Rate and Water Quality Criteria
Comments on Survey Design – September 11, 2013 Meeting**

Dear Ms. Wilson:

Clearwater Paper is pleased to offer this comment letter on the subject rulemaking. We appreciate the Idaho Department of Environmental Quality's (IDEQ) work on these very important matters and look forward to participating as this rulemaking proceeds.

General Design & Scope of Survey – Based on materials presented by BSU staff at the subject meeting, details on the underlying statistical and quantitative goals of the survey are still unclear. Perhaps these statistical design details are available and not yet part of the public record but it's vital that the survey sample size, discrete objectives and execution details dovetail with the development of a robust distribution of fish consumption in Idaho. IDEQ could consider posting a technical basis document on the website as part of the rule making process. It would also be useful to include a simple example of what the results of the survey will look like and how they will be presented.

Survey Security/Integrity – Associated with survey execution, it's important that the survey be applied uniformly across Idaho's population and that multiple responses from the same person are eliminated – unless purposely collected to provide a measure of intra-individual variability. Perhaps we missed the discussion on this part of the survey, but additional details on implementation approaches and safeguards would be appreciated either via posting or in a future meeting.

Survey Delivery Method – During the subject meeting, there appeared to be uncertainty around whether the survey would be delivered only by phone, mail, online or some combination of all three. If possible, we suggest DEQ make a choice on a single delivery method so that available resources can then be channeled and the survey optimized for a specific delivery method. Trying to develop a survey instrument for several approaches would seem to dilute resources and increase the challenge of getting the best possible results.

Single Event Survey – As we understand the plan for the survey, a household would only be interviewed one time unless they indicated they ate fish the previous week. A responder would be asked to recall fish consumed for the last 24 hours and then characterize general consumption as "once a week or more", "once a month", "once a year" etc. Unfortunately the "once a week or more" answer

proves a range from 1 to 21 meals. Incremental surveying of the same household, while certainly challenging, would be a better way to lower the variability of the resulting data including those that they did not eat fish the previous week. We urge IDEQ and BSU to optimize the survey instrument to obtain as much granularity of the data as is feasible given the limited resources.

Recontact Issues – As noted above, we urge DEQ to consider a more formal form of re-contacting previous respondents and not limit such re-contacting to only people reporting that they ate fish in the last week. This modification would improve the efficacy of the data and reduce the uncertainty of the results. This would seem to require a streamlining of a follow-up survey instrument based on the respondents first set of responses.

Gender Balance – We are not aware of any gender bias when it comes to consuming fish. To track and adjust potential responders based on gender seems like an unnecessary complication to introduce into the survey execution.

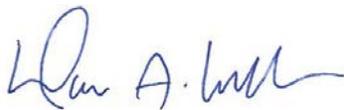
Portion Sizes – As BSU noted in the meeting, correctly recording and documenting portion sizes is a critical aspect of the planned survey. We very much support using the best available and creative visual comparisons to get the best available data (one iPhone, two iPhone, etc.) and to provide this information for every respondent and every meal consumed by each respondent.

Interviewer Training/Issues – If a phone survey is to be used, the conditional responses of the interviewer (what to ask next after a specific response) are critical in getting the most accurate survey data. BSU representatives alluded to these training and guidance work product but it's unclear if it has yet been developed.

On behalf of Clearwater Paper, we appreciate the opportunity to provide comments on these important matters and look forward to participating with IDEQ as this rulemaking goes forward.

Please contact me at 509-344-5956 or marv.lewallen@clearwaterpaper.com with questions.

Sincerely yours,

A handwritten signature in blue ink that reads "Marv A. Lewallen". The signature is fluid and cursive, with the first name "Marv" being the most prominent.

Marv Lewallen
Vice President – Environmental, Energy & Sustainability

C: Don Essig