



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

October 1, 2010

Paula J. Wilson
Hearing Coordinator
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255

Re: DEQ Rulemaking: Water Quality Standards 58-0102-1001, Negotiated Rulemaking

Dear Ms. Wilson:

Clearwater Paper submits this letter as comments to the subject proposed rule. We have been involved in the development of the subject proposed rule and participated in subject rulemaking since it was initiated in April 2010 through the Idaho Association of Commerce and Industry (IACI). IACI attended all six (6) negotiated rulemaking meetings and provided extensive written and verbal comments throughout the negotiated rulemaking. We associate our comments with those they have made and submitted.

Our concerns are similar to those submitted by other IACI members and representatives from the forest products business sector in Idaho, as well as those submitted by other manufacturing entities. The proposed rule has the potential to greatly complicate the process and delay the timing for obtaining Clean Water Act permits, and therefore has the potential to negatively affect our industry as well as other businesses that require Clean Water Act permits to conduct operations and provide jobs within Idaho.

Our role and that of other forest products businesses in Idaho involved in this rulemaking has been to support a rule that meets the requirements of the Clean Water Act without unduly burdening Idaho industry during the Clean Water Act permit process. This is consistent, not only with our company values, but with the Idaho Legislative directive that IDEQ rules not go beyond federal requirements. While we appreciate IDEQ's efforts to conduct a meaningful negotiated rulemaking process and in their effort to address our and other forest products business concerns, we believe the rule needs further clarification and refinement before it moves forward.

Thank you for the opportunity to comment on the proposed rule. Clearwater Paper Corporation will continue to monitor the progress of this rule when it is submitted to the IDEQ Board and potentially to the Idaho Legislature for approval.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew P. Van Vleet".

Matthew P. Van Vleet
Director, Public Affairs