

Boise White Paper, L.L.C.
Wallula Mill
PO Box 500 (99363-0500)
31831 West Highway 12 Wallula, WA 99363



January 18, 2012

Mr. Ted Sturdevant
Director
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Re: Boise Inc. comments on Ecology's "Fish Consumption Rates Technical Support Document, A review of Data and Information about Fish Consumption in Washington", Publication No. 11-09-050

Dear Director Sturdevant:

Boise Inc. submits the following comments to the above-referenced publication and Ecology's request for public comment.

Boise Inc. operates a pulp and paper mill at Wallula, WA in Walla Walla County on the Columbia River. We operate under an NPDES permit to discharge to the Columbia River. We employ 429 skilled workers and have been a steady employer operating since 1959. Additionally, we are the largest taxpayer in Walla Walla County, representing an important funding source for important educational, law enforcement, and first responder needs.

Our continued livelihood depends on sustainability of our community, our work force and sustainable stewardship of the natural resources we utilize. Environmental excellence is the cornerstone of our operations and we are very proud of our record of excellence and ISO14001 Environmental Certification. We have not been immune to the recent economic downturns and have experienced some periods of reduced operations. Any new or unnecessary regulations can represent a severe hardship to continued business.

After reviewing Ecology's rationale for establishing a new fish consumption rate, and in consultation with research experts from the National Council of Air and Stream Improvement (NCASI), we are very concerned that the imposing of the highest fish consumption rate (FCR) as suggested would be overly protective and is not justified in terms of overall benefit to public health. The proposed range of default FCRs overstates the fish consumption rates and is representative for small subsets of the entire population and not the majority of the public. We are deeply concerned that a flawed technical basis for an increase in the FCR will result in inappropriate public policy decisions and regulatory outcomes.

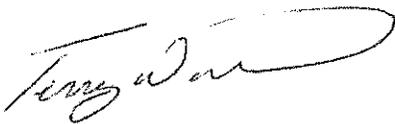
As part of the regulated community we are concerned that these rates are overly protective and could result in significant expenses in permitting and operating our NPDES waste water plant. The regulatory outcome is uncertain and compliance may not be technically or economically feasible. This uncertainty could significantly affect any future business investment at the Wallula Mill.

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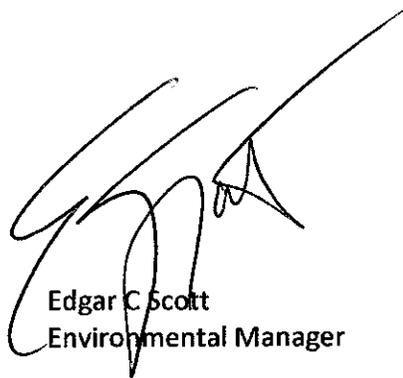
Further, imposition of extremely restrictive standards could overstate health concerns and result in apprehension on the part of sport and subsistence fish consumers and on the image of Washington's wildlife resources. Many studies indicate there are far more health benefits from a greater consumption of fish. We believe the appropriate balance between these two issues has not been fully evaluated in Ecology's analysis.

We are enclosing the comments from NCASI and respectfully request that Ecology answer the concerns related to the science and methodology as it considers whether to revise the sediment management and water quality standards. If small or specific populations are used for the development of a rule, then associated risk should not be applied equally to the entire state of Washington and the public at large. Standards development must take into account the protection of the general population and also consider the social and economic impacts as well as the technical and economic feasibility of implementing more restrictive standards. We hope that this is helpful and we look forward to learning more about this important subject.

Sincerely,



Terry Ward
Mill Manager



Edgar C. Scott
Environmental Manager