



300 Fibre Way
P.O. Box 639
Longview, WA 98632
360.425.1550
kapstonepaper.com

VIA EMAIL: 303d@ecy.wa.gov

May 14, 2015

Mr. Patrick Lizon
Water Quality Program
Washington Department of Ecology

Subject: Comments on proposed freshwater 303(d) list.

Dr. Mr. Lizon,

KapStone Kraft Paper Corporation (KapStone) appreciates the opportunity to provide comments on the proposed 303(d) list. KapStone's comments on the Washington Department of Ecology's (Ecology) proposed 303(d) freshwater list are presented below.

KapStone supports the industry comments submitted by the Northwest Pulp and Paper Association (NWPPA) on the proposed listings for temperature, dissolved oxygen, those based on fish tissue data as well as those about the Water Quality Program Policy 1-11. KapStone also supports the Weyerhaeuser Company's comments about the Columbia River Listings: ID #3784, ID #3788, ID #72805 and ID# 78120 and the Longview Ditches Listing ID# 7783.

For the proposed temperature listings on the Columbia River mentioned above, KapStone urges Ecology to change them from Category 5 to Category 1, 2 or 3 given that the proposed listings are based on an incorrect water quality criterion of 17.5 °C as a 7-day mean of daily maximum temperatures; when the applicable temperature criterion for the Columbia River from its mouth upstream to Priest Rapids Dam (river mile 397.1) is 20.0 °C as a 1 day maximum. See WAC 173-201A-602(1), Table 602, Columbia River notes 1-2. Moreover, the correct temperature criteria include both a numeric temperature criterion and an allowance of 0.3 °C for human-caused temperature increases when the numeric criteria are exceeded. As stated by both NWPPA and Weyerhaeuser's comments, the proposed temperature listings for the sections of the Columbia River require determinations of ambient river temperature attributable to natural conditions and due to human activities. Therefore, Ecology lacks information to support a regulatory determination on possible impairment of the Columbia River temperature standard.

Sincerely,

A handwritten signature in black ink that reads 'P.W. Ortiz'.

Patrick W. Ortiz
Director, Engineering, Environmental and Safety