

# Nezperce Prairie Grass Growers Association

*Pride of the Prairie - We Make Your World Green*

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June 29, 2016

Director John Tippets  
DEQ State Office  
1410 N. Hilton  
Boise, ID 83706

Re: Air Quality - Docket No. 58-0101-1601 - Negotiated Rule Making

Director Tippets:

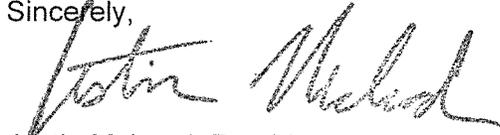
The Nezperce Prairie Grass Growers Association (NPGGA), representing blue grass seed producers in five northern Idaho counties, appreciates the opportunity to comment on Docket No. 58-0101-1601 and the Department's initiation of the negotiated rules process. Our growers have continued to follow, comment, participate, and engage in the crop residue program administered by DEQ since its inception. We have a vested interest in seeing the program continue into the future, and over the past decade, we have valued the willingness of stakeholders to work together to find equitable resolutions.

In discussing the latest draft provided by the Department of Environmental Quality (DEQ), NPGGA supports the proposed Rule Implementation Option #2 as an acceptable path forward. Though Option #3 would help to streamline the implementation process of a revised standard, there is the risk that a significant agreement between the stakeholders could be disrupted on the grounds of simple procedural details. We appreciate the response to the concerns that the implementation process would significantly hinder production in the upcoming growing season. NPGGA stands behind a negotiated rule process that allows any agreement that is supported by all the stakeholders and the Idaho Legislature be fostered by DEQ and through EPA without interruption to the 2017 crop residue burn season.

NPGGA agrees that it is vital to continue to support a strong Crop Residue Burn Program that addresses the concerns of the environmental advocacy community and allows farmers to participate in basic and approved agricultural practices to raise their crops. NPGGA also agrees that the proposed state standard of 90% of EPA's revised ozone standard of 70 parts per billion is equitable. We appreciate recent discussion concerning EPA's PM<sub>2.5</sub> standard and the role particulate matter plays in health concerns of sensitive populations and NPGGA supports the state standard of 75% of the national PM<sub>2.5</sub> standard as delineated by DEQ. Though the national standard for ozone is being tightened, Idaho has consistently fallen well below the ceiling of the standard due to a successful agreement between the environmental community and stakeholders and a program that has taken on the responsibility of weighing both health concerns and the necessities of agriculture.

The grass growing community has taken comfort and great pride in knowing that there have not been adverse health effects while the state agreement has been in place. Our farmers have always taken ownership of keeping our communities healthy and the Nezperce Prairie Grass Growers Association thanks you for your consideration of our requests.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin McLeod". The signature is written in a cursive, flowing style.

Justin McLeod, President