



Conservation Voters FOR IDAHO

PO Box 2802
Boise, Idaho 83701

June 27, 2016

Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

Re: DEQ Docket No. 58-0101-1601

Dear Ms. Wilson,

I have been on the Crop Residue Burning Advisory Committee since it's creation by the Department of Environment Quality (DEQ). I have also served as Chair of this committee several times over the years and was recently asked to do so for the current year. The Crop Residue Burning Program in Idaho is a good program based in sound science, balancing the needs of farmers and the protection of public health. Over the years the advisory committee has tackled many challenging issues and has been able to move forward with consensus. This approach has made this program workable, flexible and an opportunity to vet the issues in a fair open process.

The Burn approval criteria that currently exists in Idaho code is generally protective of the health of those potentially impacted by smoke from crop residue burning. This is because the current criteria takes into account the impacts of ozone in combination with 75% of NAAQS for other pollutants. We have been supportive of raising the ozone trigger for ozone if the standards for PM2.5 are more restrictive at 60% of NAAQS. We are not supportive of relaxing restrictions on ozone without a tightening of protections on PM2.5.

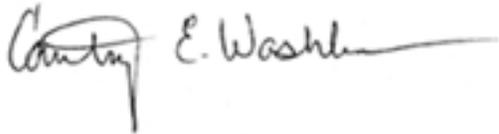
In the last rulemaking meeting information was presented regarding the impact of increasing the trigger on ozone and tightening of PM2.5. The change in ozone will result in significantly more burn days allowing farmers more flexibility in the program while stronger PM2.5 protections will lead to a potential loss of a few days in very limited locations.

We urge DEQ to move forward with burn criteria at 90% for ozone and 60% for PM 2.5 while leaving all other pollutants that fall under NAAQS at 75%. Alternatively we would support DEQ leaving the burn criteria as it appears in the current rule.

In terms of the implementation options, we have concerns regarding option 2 and 3 and believe the best option is 1 in order for the US Environmental Protection Agency to conduct a rigorous process for the approval of the State Implementation Plan.

I take pride in what this program has accomplished and I believe our recommendation is a balanced approach that is considerate of all interests. While we ultimately would not like to see any reduction in the health protections we are open to the potential compromise expressed above.

Sincerely,

A handwritten signature in black ink that reads "Courtney E. Washburn". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Courtney E. Washburn