



IDAHO - EASTERN OREGON SEED ASSOCIATION

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June 28, 2016

Idaho Department of Environmental Quality
Attn: Air Quality, Crop Residue Burning
1410 N. Hilton Street, Boise, Idaho 83706

RE: DRAFT 2 - Docket No. 58-0101-1601 - Rules for Air Quality

To whom it may concern:

On behalf of the Idaho Eastern-Oregon Seed Association (IEOSA) and its 105 seed company and affiliate business members, we express our sincere thanks and appreciation to the Department for continuing the Negotiated Rulemaking process to allow our comments to be provided regarding Draft 2 of the proposed rule changes for crop residue burning. As an organization whose membership contracts with seed producers who need fire as a tool to maintain a viable crop, it is paramount that we share our thoughts concerning the recent Draft.

The latest DRAFT reflects a proposal to leave PM 2.5 at 75% of the National Ambient Air Quality Standards and to propose Ozone at 90% of the National Ambient Air Quality Standards. Our Association supports both of these standards to be adopted in Idaho as presented and understands the science surrounding these numbers to reflect the facts that:

- 1) Crop Residue Burning has little if any impact on ozone levels.
- 2) 90% Ozone means more burn-days for Idaho producers stretched over a longer period of time.
- 3) PM 2.5 is currently under review by the Environmental Protection Agency with the possibility that more stringent standards may be adopted in the future.

The IEOSA also supports Rule Implementation Option #2 as one of three Options proposed during the June 23rd Negotiated Rulemaking meeting. Option #2 allows the industry to continue crop residue burning through the 2017 production year with the current 2008 federally adopted standards in place. Without this Option we are left with either a reduction in burn days, or a policy with no federal backing for the 2017 production year as proposed changes to Idaho's State Implementation Plan are under review by the EPA.

On behalf of Idaho's Seed Industry thank you very much for your attention to this letter and for allowing our comments to be submitted that we feel both protect public health as well as allow viable management practices for our seed producers.

Sincerely,

A handwritten signature in black ink, appearing to read 'RA', with a horizontal line extending to the right.

Roger Batt, Executive Director