

July 20, 2016

Paula Wilson  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, Idaho 83706  
Re: DEQ Docket No. 58-0101-1601

Dear Ms. Wilson:

As DEQ looks to outline the text of a rule to be adopted which modifies the long-standing successful agricultural burn program, we hope that you will keep several things in mind.

First, we heard from toxicologist Dr. Craig Dietrich that while ozone is not as insidious as PM 2.5, the effects of ozone are additive to the effects of PM 2.5. He also stated, "It's a good idea NOT to burn when ozone is at 70." He further remarked that the fact that Washington and Oregon do not consider ozone levels in their burn decisions is irresponsible. PM 2.5 is the pollutant of greater concern, because we get a buildup in our lungs of PM 2.5 for the rest of our lives; once it has deposited there, it's there forever. The plaques then increase the incidents of heart attacks and strokes.

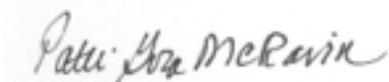
When levels of PM2.5 in the air reach 25 micrograms per cubic meter, the risk of a serious heart attack starts increasing, according to research from the Intermountain Heart Institute. For each increase of 10 micrograms per cubic meter in the amount of fine particulate matter, the researchers saw the risk of a serious heart attack rise by 15 percent. The Intermountain Medical Center Heart Institute research team reported the results of this study at the 2015 American Heart Association in Orlando.

Therefore, the DEQ has plenty of ground to stand on to sensibly balance to the proposed loosening of this important ozone health protection by a proportional tightening of the PM 2.5 levels in order to continue the same level of protections afforded by the existing agreement.

It is incorrect to say that health advocates "have enough" protections or that we can loosen ozone protections while keeping PM 2.5 at 75% and there will be no consequences to public health. There are plenty of citizens with cystic fibrosis, COPD, heart disease, pulmonary diseases and asthma that suffer direct costs such as lost work, increased medical costs and lost school days when air pollution levels climb. They count on this current level of protection to be able to go about their lives and work in this state too.

DEQ must either agree to continue the program as it is, or else if proposing a program that weakens the public health protections, must agree to tighten PM 2.5 levels in a manner that is fair and proportionate so that the critical health protections are not diminished. That is the only path forward that public health advocates can support.

Sincerely,

A handwritten signature in cursive script that reads "Patti Gora McRavin". The signature is written in black ink on a light-colored background.

Patti Gora McRavin