



Idaho Grain Producers Association

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October 11, 2016

Director John Tippetts
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

Re: Air Quality: Docket No. 58-0101-1601 – Proposed Rule
Air Quality: Docket No. 58-0101-1604 – Proposed Rule

Dear Director Tippetts,

As the president of the Idaho Grain Producers Association (IGPA), I appreciate the opportunity to comment on the proposed changes to Idaho's burn approval criteria. With over 600 wheat and barley farm families as members, IGPA is the key policy advocacy organization working on behalf of Idaho's grain industry with local, state, and federal leaders.

IGPA supports the use of burning as a Best Management Practice in managing heavy crop residue. Burning allows grain farmers to effectively and efficiently eradicate and prevent pests and diseases while maintaining yields, protecting water quality, decreasing chemical use, decreasing diesel use, and decreasing soil erosion on productive farm acres.

The U.S. Environmental Protection Agency (EPA) recently reduced the National Ambient Air Quality Standard (NAAQS) for ozone. Idaho's current statute allows for burning at 75 percent of the NAAQS – these two facts combined would have resulted in a significant reduction of allowable burn days.

IGPA is very pleased to see the proposed rule change the requirement that ambient air quality levels not exceed 90 percent of the ozone NAAQS for burns to be approved. Agency staff suggested that this change will result in anywhere from 20 – 80 additional high quality burn days per year, the actual number varying throughout the state (on the lower end of the range in North Idaho, on the higher end in South Idaho). This higher standard for ozone will allow DEQ to approve crop residue burning on days that present ideal conditions while still protecting public health – IGPA strongly supports this proposed rule.

The current timeline proposed by DEQ puts a statute change, a rule change, and an update to our State Implementation Plan in place by 2018. That leaves the 2017 burning season with significantly fewer allowable burn days (estimated at half to two-third fewer days for burning). IGPA supports the solution in Docket No. 58-0101-1604 that would allow the Crop Residue Burning Program to continue operating under the 2008 ozone NAAQS until EPA approves the new 90 percent ozone level in a revised State Implementation Plan.

In closing, IGPA would like to thank DEQ for hosting a series of thoughtful and engaging negotiated rulemaking meetings. We strongly support the proposed rules that were a result of that process.

Sincerely,

A handwritten signature in cursive script that reads "Terry Kulik". The signature is written in black ink on a light gray rectangular background.

Terry Kulik
President
Idaho Grain Producers Association