



Idaho Farm Bureau Federation

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May 25, 2016

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

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

To whom it may concern:

On behalf of the 74,000 Idaho families that are members of the Idaho Farm Bureau Federation, I write to you to express our comments regarding the Department of Environmental Quality (DEQ)'s proposed rule change to the burning approval criteria for crop residue burning (CRB). Our members own property and operate businesses, farms and ranches in all 44 counties in the state. These regulations greatly affect many farm operations and must be carefully considered to ensure the continued use of this important management practice. Idaho Farm Bureau appreciates the DEQ including our members in this negotiated rule making process to find a workable and viable solution.

Ozone NAAQS

Idaho Farm Bureau requests that the burning approval criteria regarding ozone levels be adjusted to at least 90% of Ozone NAAQS

DEQ proposes changing the burn approval criteria for ozone levels to not exceed 90% of Ozone National Ambient Air Quality Standards (NAAQS) instead of the formerly used 75%. We greatly appreciate the adjustment of the ozone standard, and recognize the potential this change affords for more days in which a farm operator may be approved for burning. We do suggest however, that the DEQ consider adjusting the ozone standard to an even greater percentage of Ozone NAAQS as such isolated burning events have little effect on ozone levels according to the information shared by the agency. We request that changing the burn approval criteria for CRB to 90% of Ozone NAAQS be the minimum percentage change from current criteria rather than the maximum.

Particulate Matter NAAQS

Idaho Farm Bureau requests that the burning criteria regarding PM_{2.5} levels be adjusted to no less than 70% rather than the proposed 65% of PM_{2.5} NAAQS

DEQ proposes changing the burn approval criteria for particulate matter (PM_{2.5}) levels to not exceed 65% of PM_{2.5} NAAQS rather than the formerly used 75%. We are uneasy with such a drastic change and significant tightening of this air quality standard, particularly since – according to the comments of health care representatives – the current 75% of PM_{2.5} NAAQS has eliminated

reported health cases where individuals have been impacted by CRB. With arguably little to no impact on human health, we recommend that the trigger for PM_{2.5} levels be adjusted to no less than 70% of the PM_{2.5} NAAQS, and that DEQ revisit this criterion after any future change made by EPA to the PM_{2.5} NAAQS. Any argument that an equal relaxing of ozone level percentage should merit equivalent percent tightening of PM_{2.5} levels is irrational and arbitrary. Considering the uniqueness and the individuality of each these pollutants, an equal percentage change of one cannot be shown to have equivalent health effects to that of the other.

Furthermore, the proposed change to the PM_{2.5} level burning approval standard poses a considerable increase of number of no-burn days during the burning season. As tighter PM_{2.5} standards eliminate more burn-days, additional farm operators will be forced to burn on moderate burn-days, only to further complicate air quality standards for human health. As the old adage indicates, "*the solution to pollution is dilution.*" Setting ultra-precautionary ambient air quality standards that significantly reduce the number of approved burn-days will only concentrate the number of CRBs on approved burn-days. An appropriate, science-based standard would reasonably spread-out the number CRB events instead of consolidating them in a narrow window of time.

Rule Making Schedule

Idaho Farm Bureau requests that all feasible means be pursued to make appropriate regulation changes and obtain EPA approval as to minimize farm operation impact.

Idaho Farm Bureau requests that DEQ enforce the resulting temporary rule during the 2017 burn season, notwithstanding any lack or delay of EPA approval.

The Environmental Protection Agency (EPA)'s announced change of the Ozone NAAQS to 70 parts per billion, greatly threatens the use of CRB as viable resource for farm operators in Idaho. As outlined in the current rulemaking schedule, such rule changes to the air quality standards will affect the 2017 burning season, due to the temporary rule requiring EPA approval. Considering the negative impact that EPA's regulation change will have on many farming operations throughout the state, we request that all viable means be pursued to enact the necessary regulation changes and obtain EPA approval as soon as possible. Furthermore, we encourage DEQ to enforce the resulting temporary rule notwithstanding EPA approval, or lack/delay thereof.

Conclusion

The proposed rule change to the burning criteria for CRB has the potential to alter management practices used by farmers throughout the state. It is vital to many agricultural sectors that CRB remain a feasible and reliable management resource, while also protecting human health. We are confident that a workable solution can be achieved by all parties.

On behalf of the members of Idaho Farm Bureau, I thank you for your consideration of this important issue, and would urge you to contact Braden Jensen at 342-2688 if you have any questions regarding these comments.

Sincerely,



Bryan Searle, President
Idaho Farm Bureau Federation