



Idaho Grain Producers Association

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June 30, 2016

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

Re: Preliminary Draft Negotiated Rule (Draft No. 2)
Docket No. 58-0101-1601, Dated June 16, 2016

Dear Ms. Wilson,

As the president of the Idaho Grain Producers Association (IGPA), I appreciate the opportunity to submit a second set of comments 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 continues to support 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.

Ozone

IGPA is pleased to see the second draft of the proposed rule continue to change the requirement that ambient air quality levels not exceed 90 percent of the ozone NAAQS for burns to be approved. This makes a lot of sense, since emissions from crop residue burning do not effect ozone concentrations like they do PM2.5 concentrations.

Particulate Matter

IGPA appreciates the work DEQ has done on modeling. At the June 23 meeting, information was presented that showed lowering the PM2.5 standard to 65 percent (while raising the ozone standard to 90 percent) could reduce burning days in Boundary County by five days and in Moscow by ten days. IGPA cannot support a standard where so many burn days are lost for our Northern Idaho Growers. Even more worrisome is that the Environmental Protection Agency is currently reviewing their PM NAAQS, so there is a lack of certainty about where that federal standard will be over time. We appreciate the department's acknowledgement of the significant health benefits that have been realized at the 75 percent PM standard in the burn criteria up until this time, and support their decision to keep the PM standard at 75 percent of the NAAQS.

Implementation Options

IGPA's preferred implementation option is Option 2. Option 1 would result in significantly fewer burning days for the 2017 burn season, and Option 3 leaves farmers who burn with questionable legal status since the State Implementation Plan will not be in alignment with state law. IGPA thanks the Department for their thoughtful review of the options – DEQ has come up with a creative solution to the problem we are going to be facing in 2017.

In closing, IGPA appreciates the opportunity to work with DEQ and all stakeholders on this important issue. We support these changes that will result in more high-quality burn days for farmers while maintaining the public health outcomes of the program.

Sincerely,

A handwritten signature in black ink that reads "Terry Kulik". The signature is written in a cursive style and is centered within a light gray rectangular box.

Terry Kulik
President
Idaho Grain Producers Association