

July 14, 2016

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

Dear Ms. Wilson:

Please add this comment to the docket.

Upon reviewing Mike McGown's proposal to implement a solution as he outlined:

- 1) IDEQ would make a yes/no burn decision based upon the existing rule of 75% of any NAAQS. Same as is currently done.

- 2) If the 75% of the NAAQS criteria was met for all pollutants except Ozone, IDEQ would then reconsider the burn decision with the criteria of meeting 90% for Ozone and 60% of the PM2.5 std.

This proposal is the best idea to move forward. It allows for both increased options for burn days for growers when ozone levels are higher while protecting public health according to the information received from the health and toxicologist presentations we received. The plan is applied in the same manner to all parts of the state and should be fairly simple to execute. It is fair, balanced, and preserves the good will and mutual respect developed over the past eight years. I believe all parties at the table could agree to this and move forward united in their support in the legislative and SIP approval pieces needed to implement it.

If DEQ proceeds along the path they have previously proposed, quite a different outcome will ensue. Public health advocates will watch as their only core health protections are chipped away. What then is to prevent DEQ from simply saying that they will eliminate all of the health protections we negotiated in good faith? The precedent it sets is awful. It will be a warning to other groups that DEQ doesn't intend to keep its word. Public health advocates would have to oppose this type of rule and this could seriously delay passage of the SIP and as a consequence, growers might have one or more years where they have greater uncertainty or greater burn restrictions as a result. No one wants to see this.

I urge DEQ to present a final option on Wednesday July 20 that adopts this proposal. It is the only path forward that all parties may be able to support.

Sincerely,

Patti Gora-McRavin