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Idaho Conservation League

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7/20/16

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

Submitted via email: paula.wilson@deq.idaho.gov

RE: Idaho Conservation League comments on Crop Residue Burning rulemaking negotiations

Dear Ms. Wilson,

Thank you for the opportunity to provide input on the Crop Residue Burning (CRB) Rule. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean air, clean water, and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting and restoring air quality throughout Idaho.

The current status of the rulemaking appears to be somewhat stalled. Various ideas have been proposed, however a compromise has not been reached. We believe compromise is the best path forward and will be most effective at achieving long-term success. That is why we support the most recent proposed solution of a tiered approach to approving burn days. We believe this is a good compromise between all parties by facilitating the use of crop burning as a management tool for growers while remaining protective of human health.

Additionally, the ICL continues to support a fair and equitable compromise between the loosening of ozone standards and tightening of PM_{2.5} standards. The current thresholds being discussed are 90% for ozone and 60% for PM_{2.5}. We are flexible on the exact percentages, but feel any loosening of ozone thresholds must be matched equally by a tightening of PM_{2.5} thresholds (e.g. if PM_{2.5} thresholds are only tightened by 5% then ozone thresholds should only be loosened by 5%, resulting in thresholds of 70% for PM_{2.5} and 80% for ozone

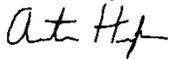
Dr. Craig Dietrich's verbal comments at the rulemaking session on July 20th, 2016 provided a clear, thorough, and scientific justification as to why the balancing of ozone

and PM_{2.5} was critical for the protection of human health. To briefly summarize, high ambient concentrations of ozone put sensitive populations at an increased risk for respiratory issues. High ozone combined with high PM_{2.5} concentrations creates a compounding effect, exacerbating the stresses inflicted upon these populations. This is why it is so pivotal that the loosening of ozone be balanced with tightening of PM_{2.5}. This balancing is necessary to ensure the protection of our most sensitive populations – including children, the elderly, or those with medical conditions.

Dr. Dietrich did stress hesitation regarding the effects of growers losing burn days and therefore burning more aggressively. However, as DEQ explained in the rulemaking session, there are multiple safeguards incorporated into the rule to ensure multiple burns do not overlap and create a large cumulative impact. We feel that if DEQ continues to manage this program through consideration of multiple factors – including nearby contributing sources, weather conditions, wind direction, etc. – then these safeguards will provide assurance that multiple burns do not overwhelm a particular region of the State.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,



Austin Hopkins
Conservation Assistant