

May 25, 2016

Ms. Paula Wilson
Idaho DEQ
1410 N. Hilton
Boise, ID

Re: 58-0101-1601 Comment

Dear Ms. Wilson:

As a member of the Crop Residue Burning advisory board, I would like to submit the following comment regarding the changes to the statute that protects public health.

The importance of this rule to the health and welfare of Idaho's citizens and the tourist industry is critical. Given that prior to the 2008, existing Federal clean-air standards did not protect citizens from hospitalizations, sicknesses and even deaths in some cases, the existing law has a proven track-record of significantly reducing citizen complaints about the health effects of agricultural burning. Before this program came to fruition, in 2001 DEQ received over 1700 citizen complaints about the health effects of burning. The most recent citizen complaint data show that for 2015, a total of only 14 complaints were logged, and of those, only 5 were deemed to be associated with an impact from a burn approval.

Secondly, we have not heard of any documented incidents of deaths either by asthmatic asphyxiation, pneumonia, nor deaths by car collisions due to visibility issues of plumes on the road. Idaho does not have a system to track any illnesses attributed to elevated ozone or elevated PM 2.5 either by county or state so we cannot say for certain, but the general sense of things is that they have greatly improved since Idaho has managed burns by disallowing them when reaching 75% of any NAAQS. The negotiated rule in place currently seems to be doing the job to protect public health.

Contrast this to the years 2000 and 2001 before we had this agreement and statute in place. Historically, monitors on the Rathdrum prairie back in those

years reached levels over 100 micrograms per cubic meter on several occasions and while this level did not break the Clean Air Act limits, (such as September 13, 2000 when Rathdrum Prairie monitors registered 161 micrograms of PM 2.5/m³) this is when the coroner confirmed that agricultural burning killed Marsha Mason, a local woman who had dialed 911 and was found to have died while waiting for the ambulance.

Complicating the need to protect public health, ozone is a pollutant that is of growing concern. Ozone is not only an irritant, it also reduces lung function, inflames and damages cells that line your lungs, make your lungs more susceptible to infection, aggravates asthma and other chronic lung diseases such as emphysema and COPD, and most seriously, it can cause permanent lung damage. Repeated short-term ozone damage to children's developing lungs may lead to reduced lung function in adulthood.

At the same time, PM 2.5 appears to be of greater concern to public health, increasing heart disease, stroke, coronary artery disease, asthma, irregular heartbeat, chest pain, fatigue and premature death.

While DEQ has offered the public information on the individual effects of ozone and PM 2.5, there is not robust research available yet to show the effects on public health when people are exposed to both higher elevations of ozone and PM 2.5 at the same time.

We have learned that several areas of Idaho have higher background levels of ozone and this is a concern. DEQ air quality managers tell us that if they can't burn agricultural fields on days that have higher ozone and higher better dispersion, then the public will be harmed more by trying to burn on marginal days, and thus, they assert that the harm will be greater to the public by allowing burns under lower ozone levels. Although DEQ could choose not to conduct burns under marginal conditions, this is not a choice that is under consideration and it would still mean that burn days would be decreased which is the central problem for the grower community.

Given that the new limits on ozone are getting much closer to the Federal Clean Air Act limits of 70 ppb, we are concerned that the public will be exposed to agricultural burning during higher levels of ozone. The exposure to higher ozone does not appear to be a factor that can be controlled; however, the exposure to PM 2.5 levels (especially near-field exposures) can be controlled by burn decisions.

At the same time DEQ proposes to loosen our current health protections, wildfire season has gotten almost 20% longer over the last 35 years and poses another threat to public health which is not under the state's control. In the Western states, our fires are lasting longer and burning more acres than ever before. The added burden of PM 2.5 exposure from extended wildfire seasons, along with elevated background ozone levels, produce a serious concern for public health when we add the practice of agricultural burning to the mix, as all three factors are occurring simultaneously.

Exposure to higher levels of these pollutants causes a chain of inflammation that often escalates with each new exposure. What starts out as wheezing soon develops into a sinus infection. With more exposure to both PM and higher ozone levels, we can see the development of bronchitis and pneumonia, and possibly heart attacks and strokes. The seriousness of the illnesses can increase over time and multiple exposures, and can certainly lead to the possibility of premature death.

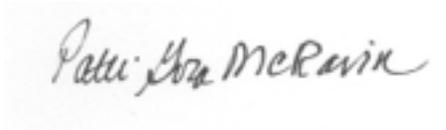
In order to safeguard the improvements we worked so hard to win, we are recommending that if DEQ is determined to relax the current health protections for ozone down from 75% of NAAQS to 90% of NAAQS, then a reasonable measure of protections should be afforded in terms of lessening exposure to PM 2.5 by reducing the parameter from 75% of NAAQS down to 60% of NAAQS, which means that no burns would be permitted if the 24 hour average of PM 2.5 is above 21.35 micrograms. This level should offer the public protection during higher ozone episodes as well as higher wildfire episodes that can extend for months at a time. Essentially, this means that if the ozone limits are relaxed 15 percentage points, then the PM 2.5 levels are tightened 15 percentage points.

We look forward to DEQ's analysis to see if the proposed 60% of NAAQS for PM 2.5 would have any significant impact on the amount of burn days available for growers to burn. I suspect it won't significantly limit those burn opportunities and therefore, would respectfully request the state implement a more protective level for this statute.

Regarding the proposed change to the language of 621.01 whereby the DEQ has proposed to strike the language of 75% of the level of "any national ambient air quality standards" and replace this with the words, "sulfur dioxide, nitrogen dioxide, carbon monoxide and lead NAAQS," I would object to that change in language, and suggest instead "any remaining national ambient air

quality standards” to preserve the original wording and intent negotiated in good faith.

Sincerely,

A handwritten signature in cursive script that reads "Patti Gora-McRavin". The signature is written in dark ink on a light-colored background.

Patti Gora-McRavin