



**Idaho Grain Producers Association**

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June 29, 2018

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

Re: Docket No. 58-0101-1803, DEQ Negotiated Rulemaking –  
Rules for the Control of Air Pollution in Idaho/crop residue burn fee payment schedule

Dear Ms. Wilson,

As the President of the Idaho Grain Producers Association (IGPA), I appreciate the opportunity to submit comments on the proposed changes to Idaho's burn fee payment schedule. 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. We greatly appreciate the efforts of the Department of Environmental Quality (DEQ), at the recommendation of the Crop Residue Burning Advisory Committee, to make the fee payment schedule for crop residue burning work more efficiently for farmers.

In the past, growers estimate the acres they will burn in a coming year and pay up front. The proposed change will allow DEQ to bill farmers at the end of the year for actual acres burned. It's worth noting that this rulemaking will not change the fee structure, only change the timing when farmers pay – and will allow them to pay for actual acres burned, not estimated acres they might burn in a season.

Feedback we've received from farmers has indicated that invoicing growers at the end of the calendar year (in mid-December) and requiring pay within 30 days, which would allow farmers to pay in the current calendar year or following calendar year, will work well. This proposed change also protects the Department from potential non-payers because if payment is delinquent, they will not process a burn permit for the next year, ensuring DEQ will receive fees owed to them.

The proposed changes to the crop residue burn fee payment schedule will not only save DEQ time and resources, it will also be a more efficient process for farmers. IGPA supports the proposed changes and appreciates the opportunity to work with DEQ on this important program.

Sincerely,

Dwight Little  
President  
Idaho Grain Producers Association