

Appendix D. Comment and Response to Comment

11/13/18 6:55 AM PT

Jerry Synder

I am a cooperater and stake holder with WSU Dr. Brenton Sharratt concerning pm10 issues. Live in Adams County Washington near Ritzville and Washtucna. We need to continue education and discussion and provide incentives concerning wind erosion in our area. No-Till is not a complete answer especially in the lower rain fall areas under 11 inches of rain per year. 10 inches in my case. The economics of no-till are not always as consistent as summer fallow rotation. Therefore, continued stubble cover especially on all soil types is important. With a State where 60 plus percent of our arable land is under 12 inches of rainfall this is imperative.

I would be willing to discuss more and help provide viable solutions

Ecology Response:

Mr. Snyder, Thank you for your comment on Ecology's High Wind Fugitive Dust Mitigation Plan (Mitigation Plan). We are glad to hear you are working with Washington State University (WSU). Participation of producers like you are key to their research efforts. We agree that additional stubble on farmland in the Columbia Plateau is desirable and worth promoting.

Air quality monitors at Kennewick measure particulate matter ten microns or less (PM10), in excess of federal air quality standards during high wind events. Since the wind often picks up dust from the Horse Heaven Hills agricultural area during these events, the Mitigation Plan focuses on this area, which includes Benton and east Klickitat counties. Because of this, we granted Benton Conservation District cost-share incentive funds for eligible producers with expiring Conservation Reserve Program contracts. In addition, the High Wind Workgroup that will be formed as described in the Mitigation Plan will also focus on this area.

Since the late '80s and early '90s, Ecology has worked with WSU and Conservation Districts (CDs) in eastern Washington, as well as the Washington Association of Wheat Growers. United States Department of Agriculture's (USDA's) voluntary, incentive-based conservation measure programs continue to be the most effective way to reduce soil erosion. It's common knowledge that Columbia Plateau soils are very fine and efforts to prevent erosion remain a high priority for USDA.

Great strides have been made in adoption of no till practices in the lower rainfall areas. WSU remains on the forefront of research for these areas. While not appropriate for all Columbia Plateau lands, many producers in low rainfall areas have been able to transition to no-till successfully; most had help. The change to a no-till operation can be expensive. The equipment costs, in addition to the increased chemical costs, are considerable. CDs, through skilled and persistent efforts, have found grants and partners to purchase equipment that can be shared among producers. No-till farmers have also rented their equipment to other producers. As always, the decision on what activities and conservation measures are applied rests with the producer. And of course, USDA Natural Resource Conservation Service (NRCS) has other programs to provide incentives to implement conservation measures and increase stubble cover.

Those that continue to use conventional tillage methods could consider going to mulch-till. Mulch-till provides many of the benefits of no-till.

Education and incentives through CDs and USDA offices continue in all areas of the Columbia Plateau, including research at WSU. Since you work with WSU, you are already undoubtedly aware of new methods and efforts. To discuss education efforts and incentives in your area, contact your Conservation District office. [Adams CD](#) monthly meetings are the third Thursday of the month (except for July) at 7:30 pm at the District office located at 118 E Main Ave in Ritzville.

Another way to be involved is through your [NRCS Local Work Group](#) (LWG). As you are no doubt aware, Adams County is part of the Washington Association of Conservation Districts, West Palouse LWG area. If you aren't already attending the [annual LWG meetings](#), you may contact current chair, Mike Carstensen at 509 639-2365 or the District Conservationist at 509-725-4181, ext. 3 to get on the list.

Ecology staff historically attend the South Central LWG meeting, since this area includes Benton and east Klickitat counties. Ecology also goes to the West Palouse LWG meeting whenever possible.

Ecology's Air Quality Program at Eastern Regional Office (ERO) covers Adams County. This group has a good working relationship with the farmers in that area through our agricultural burn program. You may contact David Knight at 509-329-3469 or Kary Peterson at 509-329-3523 at ERO.

As many acres in eastern Washington transition to no-till or other permanent vegetation, such as vineyards, there will likely be fewer passes with equipment and less disturbance to the area's soils, but this is by no means a reason to be less vigilant. Thank you for your interest and work with WSU. Please contact Laurie Hulse-Moyer at laurie.hulse-moyer@ecy.wa.gov or 360-407-6783, if you have questions.

This response sent to commenter through Ecology's SmartComment software

Sent by email to: Cara Hulce, Adams CD; Mike Carstensen, West Palouse LWG; Ann Swannack, District Conservationist; Corey Bensen, South Central Local Workgroup; David Knight, ERO, Air Quality Regional Manager; Sanjay Barik, CRO Air Quality Regional Manager; Dr. Bill Schillinger, Washington State University; Dave Huggins Acting for Dr. Brenton Sharratt, USDA-ARS