

**IDAHO STATE DEPARTMENT OF AGRICULTURE ("ISDA")  
PETITION TO INITIATE RULEMAKING**

All rulemaking petitions must substantially comply with IDAPA 04.11.01.820, which addresses petitions to initiate rulemaking as described by Section 67-5230, Idaho Code. The requirements have been laid out below. ISDA will consider all petitions and act to either initiate or deny rulemaking in accordance with I.C. § 67-5230(1) and IDAPA 04.11.01.821.

Please note that ISDA may only conduct rulemaking within the authority provided it by statute in order to govern the department's jurisdiction. *See* I.C. § 22-101(3). Prior to petitioning ISDA, please verify and understand the authority of ISDA as it relates to the petition's desired outcome. If a petition for rule change is outside of ISDA's legal authority, it will be denied.

Name of petitioner(s): Idaho Dairymen's Association

Address of petitioner: 195 River Vista Place, Suite 308. Twin Falls, Idaho 83301

Phone number of petitioner: 208-308-3382

Email address of petitioner: bnaerebout@gmail.com

Petitioner's interest in matter:

The Rule and Statute govern the dairy industries Nutrient Management Plans and Idaho Dairymen's Association represents Idaho Dairy Producers

Describe the nature of the rule or amendment to the rule and the petitioner's suggested rule or amendment: Changing from Phosphorus Thresholds to Phosphorus Indexing as a regulatory standard

Name of the statute, order, rule or other controlling law:

Title 37 - Chapter 6

Factual allegations upon which the petitioner relies to support the proposed rulemaking:

Adopt a more accurate and reliable Phosphorus standard

Citations of cases and/or statutory provisions that apply (optional):

This standard is being used by multiple states.