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From: Rick Naerebout <rick.naerebout@gmail.com>
Date: May 14, 2018 at 11:22:41 AM MDT
To: "Dr. Scott Leibsle" <Scott.Leibsle@ISDA.IDAHO.GOV>
Cc: Bob Naerebout <bnaerebout@gmail.com>
Subject: Phosphorus Negotiated Rulemaking

Dr. Leibsle,

IDA would like to request that as the Nutrient Management Standard rules within the Dairy Environmental Control Act are being discussed/negotiated this summer we include in that discussion a consideration for variances that may occur within the results provided dairymen by soil and manure testing labs. The department has been employing a common sense approach regarding this issue and IDA feels it would be prudent to capture that approach within the language of the rule so there is a clear understanding of magnitude of lab variances will be acceptable going forward.

Please let me know if you need additional information to include this request in the July rulemaking meeting. We understand that this subject cannot be part of the first rulemaking given that proper notice will not have occurred.

Thanks,



Rick Naerebout
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