

MPI's response to our rulemaking request.

From: marvrpatten@gmail.com [mailto:marvrpatten@gmail.com]

Sent: Monday, July 23, 2018 10:54 AM

To: Dr. Scott Liebsle

Subject: {External}Negotiated Rulemaking-Dairy Byproduct

Dr. Liebsle,

Due to the dramatic economic downturn with milk prices and very little light at the end of the tunnel, Idaho has and will continual see dairymen go out of business at an accelerated pace. Many are trying to brace for the future, seeking loans, conducting long range planning, and selling off portions of their business to stay afloat. Removing the phosphorus threshold sunset clause will provide some certainty and comfort for those dairymen that do not have adverse nutrient management issues. The phosphorus indexing standard will increase costs for many dairymen. More information and time is needed to establish appropriate testing parameters and tolerances for soil and manure. As this information develops, a defensible degree of accuracy "tolerance" can be negotiated into the rule. This is key to move forward with updating the 1999 NRCS 590 standard. At this time, MPI requests removal of the sunset clause and allow dairymen the permanent option of what standard to utilize. In addition, MPI will continue to work with all parties to develop fair/objective/defensible soil testing standards and modifications to the 1999 590 standard.

Thank you,

Marv

Sent from [Mail](#) for Windows 10