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**Subject:** Dairy Byproduct Rulemaking  
**Date:** Tuesday, June 23, 2020 10:56:54 AM  
**Attachments:** [2019 Soil Experiment Data and Analysis.docx](#)  
[2011 U of I soil phos paper.pdf](#)  
[Manure Variability from Solid Stacked Manure.docx](#)  
[lagoonCharact.pdf](#)  
[image003.png](#)

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Stakeholders –

As promised, I am forwarding you the summary of the experiment ISDA conducted in 2019 to evaluate the variability of soil phosphorus testing. I have also included the Univ. of Idaho publication submitted by ICL to justify their desire to set the trigger point at 40 ppm. Lastly, two documents were submitted by ARS that discuss the reliability of on-farm manure testing to determine nutrient concentration. Please let me know if you have any questions. As a reminder, the comment period for this rulemaking closes one week from today. Please submit comments and any additional scientific data to either me or Brian Oakey no later than next Tuesday (June 30). Thanks everyone. I thought the virtual rulemaking meeting went very well....thanks for your patience and understanding. We may be doing a lot more of those type of meetings for the foreseeable future, so I'm glad it seemed like everyone was able to actively participate with only minimal technical difficulties.



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