

From: [Brian Oakey](#)
To: [Janis Perry](#)
Subject: FW: {External}Dairy Byproduct Rulemaking Proposed Language
Date: Wednesday, July 8, 2020 11:11:40 AM
Attachments: [020414 Byproduct Rule proposed.docx](#)
[Idaho Dairy Nutrient Management Standard proposed.docx](#)
[image001.png](#)

From: Rick Naerebout <rick.naerebout@gmail.com>
Sent: Monday, June 15, 2020 8:59 AM
To: Dr. Scott Leibsle <Scott.Leibsle@ISDA.IDAHO.GOV>
Cc: 'Marv Patten' <marvrpatten@gmail.com>; 'Russ Hendricks' <rhendricks@idahofb.org>; 'Bob Naerebout' <bnaerebout@gmail.com>; Brian Oakey <Brian.Oakey@ISDA.IDAHO.GOV>; 'David Claiborne' <david@sawtoothlaw.com>
Subject: {External}Dairy Byproduct Rulemaking Proposed Language

Dr. Leibsle,

Milk Producers of Idaho, the Idaho Farm Bureau and the Idaho Dairymen's Association are collectively putting forward the attached amended documents as our suggested changes for the Dairy Byproduct Rule and the Dairy Nutrient Management Standard.

We feel the exercise the Department undertook to try and determine variability in soil sampling and lab analysis more the provides the basis for the suggested changes. In particular, having a threshold value greater than 40ppm before a producer is required to use indexing is appropriate, given the Department demonstrated variances of over 100% when evaluating both lab and sampler. Setting threshold regulations too stringently, with knowledge of the potential variability, would put an unfair burden on dairy producers.

Please reach out if you have any questions prior to tomorrow's rulemaking.

Thanks,



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