



July 20, 2020

Brian Oakey
Deputy Director
Idaho State Department of Agriculture

Re: Pesticides and Chemigation Negotiated Rulemaking Comments

Brian,

Thank you to you and your staff for your work on the Rules Governing Pesticide and Chemigation Use and Application. With over 40 participants in the rule you did an excellent job of giving everyone the ability to get their questions addressed.

The Idaho Dairymen's Association is supportive of the proposed rule as currently written.

It is our belief that the following points are critical and adequately addressed within the draft rule shared with stakeholders.

- The proposed ensure that the State of Idaho, through ISDA, is the primary enforcement authority to regulate pesticides and chemigation.
- The public health is equally protected under the proposed rule as under the current rule.

We do believe at the August 4th rulemaking the Department needs to address situations where a label does not clearly state wind velocity restrictions for application. If not all labels provide wind velocity instructions, a wind velocity should be prescribed within the rule for labels that are absent this information.

Thanks again for your work on this rule and the others we have participated in this year.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Naerebout", with a stylized flourish at the end.

Rick Naerebout
Chief Executive Officer
Idaho Dairymen's Association, Inc.