

**From:** Russ Hendricks [<mailto:rhendricks@idahofb.org>]

**Sent:** Wednesday, August 17, 2016 4:43 PM

**To:** Dr. Scott Leibsle

**Subject:** RE: Revised Dairy Waste Strawman

Dr. Leibsle:

On behalf of the members of the Idaho Farm Bureau, thank you for the opportunity to comment on the latest draft of the dairy byproducts rule.

We support the changes that have been made to the rule with one exception. Our members are concerned that the proposed section "Pasturing of Dairy Animals", section 030.03, is more strict than current rules require.

Specifically, the rules currently state that if a dairy is pasturing cattle and the soil sampling shows the nutrients are less than 75% of the threshold, then the sampling only needs to take place every five years, while if it is over 75% the sampling should take place every three years.

The proposed rule states: "Soil tests shall be conducted every three (3) years on all lands utilized as pasture." This does not give the flexibility of going to every five years for those pastures that are well below the threshold.

The purpose of pasturing dairy cattle is to avoid feeding other rations while there is good forage in the pasture. As forage is harvested, part of the nutrients are utilized for milk production and maintenance of the dairy animal, while the rest is returned to the soil in the form of manure. There is no possibility of depositing more nutrients on a pasture than is available in the forage that is being harvested, unless you supplement with land application. Therefore, by definition, if you are not land applying any additional nutrients, you will be decreasing the nutrients within the soil in the pasture. However, once you do add additional nutrients through land application, you will have to do an annual soil sample.

Our members request that the current soil sampling requirements be retained, including the ability to sample only every five years if the nutrients are below 75% of the threshold.

Thank you for your consideration of these comments.

Sincerely,

Russ Hendricks  
Idaho Farm Bureau