STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

C.L. "BUTCH" OTTER
Governor
CELIA R. GOULD
Director

Memorandum

Date: May 8, 2012

To: Idaho Crop Improvement Association
Idaho-Eastern Oregon Seed Association
Idaho Seed Analysts Association
Jacklin Seed Company
Nezperce Prairie Grass Growers Association
Primeland Cooperative
Seeds, Inc.

From: Michael E. Cooper, Bureau Chief
Division of Plant Industries

Subject: **Quarantine Rules:** **02.06.14 – Rules Governing Annual Bluegrass (*Poa annua*)**
02.06.35 – Rules Concerning Rough Bluegrass (*Poa trivialis*)

I would like to thank everyone for their responses concerning these two rules. The rules will remain in place. However, from the correspondence received and discussions with the Idaho Crop Improvement Association, two changes need to be made to reflect or legalize current industry practices.

1) The use of a certificate of analysis as substitute for the quarantine tags is not allowed in the current rules, so both rules need to be changed to reflect this current industry practice.

2) Nursery inspections for compliance with the rules may only be conducted by the Idaho State Department of Agriculture. Both rules need to be changed to provide for inspections by the Idaho Crop Improvement Association.

Pursuant the newly passed Senate Bill 1366, we may be scheduling a negotiated rule making session in July to accommodate public input to these proposed changes.

Please feel free to contact me if you should have any questions.

2270 Old Penitentiary Road • P.O. Box 790 • Boise, ID 83701-0790 (83712 for physical address)
(208) 332-8500 • www.agri.idaho.gov

CHS
116 NW Depot Rd.
P.O. Box 49
Madras, Oregon 97741

RECEIVED
MAY - 7 2012
PLANT INDUSTRIES

Date: May 4, 2012

To: Michael E. Cooper, Bureau Chief
Division of Plant Industries, Idaho

From: Leslie Gilmore, Seed Production Mgr., CHS

CC: Scott Blake, Idaho Crop Improvement Assn.
Sheri Goldsmith, CHS

Subject: Quarantine Rules

We understand the Idaho Dept of Ag is reviewing and assessing whether to continue the Quarantine program regulating the seed stock used in grass seed production. CHS is a grass seed company with production throughout the PNW, including Idaho. We contract production with growers, purchase the seed crop from growers, condition seed for sale and market grass seed. Most of our production is Kentucky bluegrass.

Crop purity is critically important in grass seed marketing. Contamination with Poa annua and/or Poa trivialis will greatly devalue a seed lot or, in some cases, it can make the crop unmarketable. Any program that helps limit the spread of these two contaminants is essential. The Quarantine program has been effective in this regard.

We understand that tags have not been issued for some time, but tagging is not important from our perspective. The requirement of a Quarantine test on seed stock seems to be an adequate method to enforce the rules, without being unnecessarily burdensome.

It is important to continue with this program. We fully support the continuation of the current program and the maintenance of the current rules.

Sincerely,

Les Gilmore

Phone: 541-475-2222 • Fax: 541-475-6603 • www.chsmadras.com

Mike Cooper

From: ghlowry[redacted]
Sent: Monday, April 23, 2012 8:50 AM
To: Mike Cooper
Subject: Re: Quarantine Rules 02.06.14 & 02.06.35

Sure, I will sign it and send it over to you today.

Greg

-----Original Message-----
From: Mike Cooper <Mike.Cooper@agri.idaho.gov>
To: ghlowry[redacted]>
Sent: Mon, Apr 23, 2012 8:33 am
Subject: RE: Quarantine Rules 02.06.14 & 02.06.35

Greg,

Could I get this report on ICIA letter head with a signature?

Mike C.

From: [redacted]
Sent: Monday, April 23, 2012 8:31 AM
To: Mike Cooper
Subject: Re: Quarantine Rules 02.06.14 & 02.06.35

Mike,

Here is some information from Scott Blake in our N. Idaho office. If you need anything else let me know.

Greg

-----Original Message-----
From: Mike Cooper <Mike.Cooper@agri.idaho.gov>
To: ghlowry [redacted]>
Cc: Dick Lawson <Dick.Lawson@agri.idaho.gov>
Sent: Thu, Apr 19, 2012 2:06 pm
Subject: Re: Quarantine Rules 02.06.14 & 02.06.35

Thank you

Michael E. Cooper
Sent via iPhone

On Apr 19, 2012, at 4:05 PM, [redacted] wrote:

> Mike,
>
> Scott is out until Monday and I am going to be out tomorrow. I am sure between the two of us we can come up with something that will give us a general idea of the activity concerning these two rules. We will try to have something next week.
>
> Greg
>
> -----Original Message-----
> From: Mike Cooper <Mike.Cooper@agri.idaho.gov>

To: [redacted]
Sent: Thu, Apr 19, 2012 1:55 pm
Subject: Fwd: Quarantine Rules 02.06.14 & 02.06.35

Greg,

Is there a report you or Scott could put together summarizing ICIA activity with regard to these two rules over the past few years?

Michael E. Cooper
Sent via iPhone

Begin forwarded message:

> **From:** Chris Oestmann [redacted]
> **Date:** April 19, 2012 2:18:13 PM EDT
> **To:** 'Mike Cooper' <mike.cooper@agri.idaho.gov>
> **Cc:** terry peters [redacted], roger bat[redacted]
> **Subject: RE: Quarantine Rules 02.06.14 & 02.06.35**
>
> Mike,
>
> We should keep the current form, and leave the tagging and testing in place. Idaho's claim to fame is quality turfgrass and this is important to protect our production. I was surprised to hear your comment that " ICIA was not aware of any new activity within the last few years concerning the use of quarantines by the Idaho seed industry"
> I contacted Greg Lowry and he said that Scott Blake has been monitoring the program and testing has been on-going for years, the tagging is in place and should always be available on request. ICIA has been applying the law and meeting industries needs. I understand the need to review all programs and see that they still apply from a cost basis, but this is an important program that should continue to be in place for the Idaho seed industry.
>
> Regards,
> Chris
>
> ---
>
> **From:** Mike Cooper [mailto:Mike.Cooper@agri.idaho.gov]
> **Sent:** Wednesday, April 18, 2012 2:08 PM
> **To:** Chris Oestmann
> **Subject:** RE: Quarantine Rules 02.06.14 & 02.06.35
>
> Would that be in their current form? We have not done any testing or tagging in years.
>
> ---
>
> **From:** Chris Oestmann [redacted]
> **Sent:** Wednesday, April 18, 2012 2:57 PM
> **To:** Mike Cooper
> **Cc:** roger batt; terry peters
> **Subject:** Quarantine Rules 02.06.14 & 02.06.35
> **Importance:** High
>
> Mike,
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> After reviewing your memorandum regarding Quarantine Rules: 02.06.14 – Rules Governing Annual Bluegrass (Poa annua) and 02.06.35 – rules Concerning Rough Bluegrass (Poa trivialis) , Seeds Inc. would be in support of continuing these rules. Both of these rules were created to prevent the introduction in major Kentucky bluegrass, fesue species, ryegrass species and bentgrass species seed production in Idaho and they continue to be critical for quality seed production for the seed industry.
>
> Please keep us updated to the responses of your memorandum.

Regards,

Chris Oestmann
Quality Control Mgr.
Seeds Inc
[redacted]

April 23, 2012

Idaho State Department of Agriculture
P. O. Box 790
Boise, Idaho 83701-0790

RE: ISDA Poa annua and Poa trivialis quarantine

To Whom It May Concern:

History: Before the 1990's the grass seed industry producing turf seed (Kentucky bluegrass, ryegrass, fescues) were faced with seed being planted for multiplication with the undesirable grass species Poa annua and/or Poa trivialis. **Some** Idaho certified turf seed producers were very diligent to produce seed stock free of these undesirable grasses and were marketing that fact, but did not have a rule to direct other Idaho seed producers to plant seed that had been tested and found free of the undesirable grasses. Sometime in the mid 1990's the ISDA was approached to draft such rules. Grass producers and ICIA working with Dick Lawson as the Bureau Chief at the ISDA Seed Laboratory drafted the two quarantine rules. About 1998 the ISDA enacted the Annual Bluegrass and Rough Bluegrass Quarantine Rules.

Prior to 1998 certified seed producers were using a 25 or 50 gram crop and weed test to market seed lots. For a few years after the quarantine rule went into effect ISDA supplied the Post Falls ICIA office with Quarantine Release Tags (tags) to be printed and attached after the Annual or Rough Bluegrass Analysis Certificate was issued. ICIA provided Dick Lawson a report showing the number of tags printed, tag serial numbers, lot number and number of pounds tagged. ICIA would then issue the tags to the seed company. There were costs involved for all parties. Also, ICIA was staffed by me, so at times turnaround time getting quarantine tags out was not as quick as the seed company needed once a seed sale was imminent. Since a qualified seed laboratory had already issued an Analysis Certificate (we need to remember the certificate could be issued months before the actual seed sale) an idea of using just the quarantine test was proposed to me and Dick. Other states had started to use just the analysis certificate in place of quarantine tags. We agreed, rather informally, we would use the quarantine analysis with the idea this would help expedite and alleviate the extra costs associated with the printed tag. After a few years the use of attaching the quarantine tags was phased out. When seed stock is planted, ICIA still requests the 25 or 50 gram analysis.

Central Office

429 SW 5th Avenue, Suite 105
Meridian, ID 83642
P: 208 884.8225
F: 208 884.4201
www.idahocrop.com

District Offices

2283 Wright Avenue, Suite C
Twin Falls, ID 83303-4803
P: 208 733.2468
F: 208 733.4803

1680 Foote Drive
Idaho Falls, ID 83402-1826
P: 208 522.9198
F: 208 529.4358

5920 Government Way, Suite 10
Dalton Gardens, ID 83815.9200
P: 208 762.5300
F: 208 762.5335

Member, Association of Official Seed Certifying Agencies cooperating with University of Idaho College of Agricultural and Life Sciences

Producing pure seed under rigid rules and regulation including field inspection, supervision of harvesting, conditioning, tagging and sealing

Summary: The Annual Bluegrass and Rough Bluegrass Quarantine Rules are still in use with the certificate of analysis in lieu of the tag for seed applied to ICIA for seed certification. Idaho has twice the acres of common turf seed being grown where the quarantine rules are not regulated. Certified turf seed producers are quick to point out the integral role the quarantine rules play in their ability to market their seed as free of Annual or Rough Bluegrass.

Opinion: I believe the two quarantine rules should stay in place. To eliminate one or both of the rules would hurt our turf seed industry. The actual tag should be an option to use. If needed the language in the rules could define the option of using a tag or analysis certificate.

Sincerely,

Gregory H. Lowry
Executive Vice President

Mike Cooper

From: ghlowry[redacted]
Sent: Monday, April 23, 2012 8:31 AM
To: Mike Cooper
Subject: Re: Quarantine Rules 02.06.14 & 02.06.35
Attachments: iSDA_Poa_annua_and_Poa_trivialis_quarantine.docx

Mike,

Here is some information from Scott Blake in our N. Idaho office. If you need anything else let me know.

Greg

-----Original Message-----
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To: ghlowry[redacted]
Cc: Dick Lawson <Dick.Lawson@agri.idaho.gov>
Sent: Thu, Apr 19, 2012 2:06 pm
Subject: Re: Quarantine Rules 02.06.14 & 02.06.35

Thank you

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Sent via iPhone

On Apr 19, 2012, at 4:05 PM,[redacted]

> Mike,
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> Greg
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> -----Original Message-----
> From: Mike Cooper <Mike.Cooper@agri.idaho.gov>
> To: Greg Lowry [redacted]
> Sent: Thu, Apr 19, 2012 1:53 pm
> Subject: Fwd: Quarantine Rules 02.06.14 & 02.06.35
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> Greg,
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> Is there a report you or Scott could put together summarizing ICIA activity with regard to these two rules over the past few years?
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> > **From:** Chris Oestmann [redacted]
> > **Date:** April 19, 2012 2:18:13 PM EDT
> > **To:** 'Mike Cooper' <mike.cooper@agri.idaho.gov>
> > **Cc:** terry peters [redacted], roger batt [redacted]
> > **Subject: RE: Quarantine Rules 02.06.14 & 02.06.35**

Mike,

We should keep the current form, and leave the tagging and testing in place. Idaho's claim to fame is quality turfgrass and this is important to protect our production. I was surprised to hear your comment that " ICIA was not aware of any new activity within the last few years concerning the use of quarantines by the Idaho seed industry"
I contacted Greg Lowry and he said that Scott Blake has been monitoring the program and testing has been on-going for years, the tagging is in place and should always be available on request. ICIA has been applying the law and meeting industries needs. I understand the need to review all programs and see that they still apply from a cost basis, but this is an important program that should continue to be in place for the Idaho seed industry.

Regards,
Chris

From: Mike Cooper [mailto:Mike.Cooper@agri.idaho.gov]
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Subject: RE: Quarantine Rules 02.06.14 & 02.06.35

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From: Chris Oestmann[redacted]
Sent: Wednesday, April 18, 2012 2:57 PM
To: Mike Cooper
Cc: roger batt; terry peters
Subject: Quarantine Rules 02.06.14 & 02.06.35
Importance: High

Mike,

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Please keep us updated to the responses of your memorandum.

Regards,

Chris Oestmann
Quality Control Mgr.
Seeds Inc
[redacted]

ISDA Poa annua and Poa trivialis quarantine

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Mike Cooper

From: ghlowry[redacted]
Sent: Thursday, April 19, 2012 2:05 PM
To: Mike Cooper
Cc: blake.icia@gmail.com
Subject: Re: Quarantine Rules 02.06.14 & 02.06.35

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Quality Control Mgr.
Seeds Inc
chris@seedsinconline.com

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Sent: Thursday, April 19, 2012 1:54 PM
To: Mike Cooper
Cc: terry peters; roger batt
Subject: RE: Quarantine Rules 02.06.14 & 02.06.35

Thanks, Mike. Sounds good.

Chris

From: Mike Cooper [mailto:Mike.Cooper@agri.idaho.gov]
Sent: Thursday, April 19, 2012 12:50 PM
To: Chris Oestmann; Roger Batt
Subject: Fwd: Quarantine Rules 02.06.14 & 02.06.35

FYI

We will qet with Greg and Scott and get some up to date information.

Michael E. Cooper
Sent via iPhone

Begin forwarded message:

> **From:** Dick Lawson <Dick.Lawson@agri.idaho.gov>
> **Date:** April 19, 2012 3:46:50 PM EDT
> **To:** Mike Cooper <Mike.Cooper@agri.idaho.gov>
> **Subject: RE: Quarantine Rules 02.06.14 & 02.06.35**
>
> I did and he said that there wasn't any new changes or he had not heard of any real activity for some time on these rules.
> I guess that Scott simply had been handling it and it simply was being done without any comments back to Greg.
>
> Dick.
>
> ---
>
> **From:** Mike Cooper
> **Sent:** Thursday, April 19, 2012 12:49 PM
> **To:** Dick Lawson
> **Subject:** Fwd: Quarantine Rules 02.06.14 & 02.06.35
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> > **Date:** April 19, 2012 2:18:13 PM EDT
> > **To:** 'Mike Cooper' <mike.cooper@agri.idaho.gov>

Cc: terry peters <t[illegible]@seedsinconline.com>, roger batt <rog[illegible]mgidaho.com>
Subject: RE: Quarantine Rules 02.06.14 & 02.06.35

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Chris Oestmann
Quality Control Mgr.
Seeds Inc
chris@seedsinconline.com

STATE OF IDAHO

DEPARTMENT OF AGRICULTURE

C.L. "BUTCH" OTTER
Governor
CELIA R. GOULD
Director

Memorandum

Date: April 13, 2012

To: Idaho Crop Improvement Association
Idaho Eastern Oregon Seed Association
Idaho Seed Analysts Association
Jacklin Seed Company
Nezperce Prairie Grass Growers Association
Primeland Cooperative
Seeds, Inc.

From: Michael E. Cooper, Bureau Chief
Division of Plant Industries

Subject: **Quarantine Rules:** **02.06.14 – Rules Governing Annual Bluegrass (*Poa annua*)**
02.06.35 – Rules Concerning Rough Bluegrass (*Poa trivialis*)

We are reviewing the continued need for and possible repeal of these rules and there is an annual cost associated with keeping these rules published. Please review the information below and the attached rules and send me any comments or concerns you may have regarding the need or lack thereof for these rules. We would appreciate your reply at your earliest possible convenience.

The Rules Governing Annual Bluegrass (*Poa annua*) was created to prevent the introduction of annual bluegrass into major Kentucky bluegrass, fescue (*Festuca*) species, ryegrass (*Lolium*) species and bentgrass (*Agrostis*) species seed production in Idaho. The rule 02.06.14 was formally adopted on March 30, 2001, and has been in effect for 11 years.

The Rules Concerning Rough Bluegrass (*Poa trivialis*) was created to prevent the planting of rough bluegrass for seed production in the 18 Idaho counties with major Kentucky bluegrass, fescue (*Festuca*) species, ryegrass (*Lolium*) species, and bentgrass (*Agrostis*) species seed production. The rule 02.06.35 was formally adopted on March 20, 1997, and has been in effect for 15 years.

Quarantine tags have not been issued for several years. A 25 gram seed examination on the larger grass seeds and a 10 gram seed examination on the Agrostis species for the presence of *P. annua* and *P. trivialis* is in the testing requirements for sod quality seed and has became the routine practice for seed stock prior to planting in Idaho. The Idaho Crop Improvement Association (ICIA) conducted much of the work with these quarantine rules from their Post Falls office in maintaining seed lot records. ICIA and the Idaho State Department of Agriculture (ISDA) are not aware of any new activity within the last few years concerning the use of these quarantines by the Idaho seed industry.

Enclosures: Rules Governing Annual Bluegrass (*Poa annua*)
Rules Concerning Rough Bluegrass (*Poa trivialis*)

Gregory H. Lawry, Executive Vice President
Idaho Crop Improvement Association
429 SW Fifth Avenue, Suite 105
Meridian, ID 83642

Terry Perryman, President
Idaho – Eastern Oregon Seed Association
55 SW 5th Avenue, Suite 100
Meridian, ID 83642

Duane Jacklin, President
Jacklin Seed Company
5300 West Riverbend Avenue
Post Falls, ID 83854

Doug Schroeder, Manager
Seeds, Inc.
123 State Line Road
Tekoa, WA 99033

Benjamin Kelly, Executive Director
Nezperce Prairie Grass Growers Association
55 SW 5th Avenue, Suite 100
Meridian, ID 83642

Scott Blake
Idaho Crop Improvement Association
5920 Government Way, Suite 10
Dalton Gardens, ID 83815

Lynn Robinson, RST
Idaho Seed Analysts Association
Dairyland Seed Company
504 W. Idaho Avenue
Homedale, ID 83628-3343

Ken Blakeman, General Manager
Primeland Cooperatives
1200 Snake River Avenue
P.O. Box 467
Lewiston, ID 83501

Nathan Riggers, President
Nezperce Prairie Grass Growers Association
1983 Henderson Road
Nezperce, ID 83543