



## Idaho Noxious Weed Control Association

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July 24, 2024

Lloyd Knight  
Deputy Director  
Idaho State Department of Agriculture  
PO Box 7249  
Boise, Idaho 83707

Dear Mr. Knight,

The Idaho Noxious Weed Control Association (INWCA) represents members dedicated to the control of noxious weeds and invasive species in Idaho. Those members are private landowners or could be employed by a local, state, or federal entity, or by a tribe. The INWCA appreciates the opportunity to comment on the proposed rule revisions in IDAPA 02.03.03.

The INWCA supports the proposed revision of instituting additional methods for determining competency other than a written examination. Not everyone can perform to their true potential on a written examination, and some can comprehend better by actually participating in the task and learning from that participation. By expanding the determination of competency, it will likely assist in opening the door for more individuals to become interested and engaged in vegetation management across the state.

Additionally, the INWCA supports the change that allows the apprentice license to be applied to all categories except AA, NS and SF. This should assist in acquiring more individuals into the vegetation management field in a timely manner with the correct supervision during the apprentice period.

Overall, these revisions are a positive step. If you have any questions regarding our comments, please feel free to reach out to our office.

Sincerely,

A handwritten signature in black ink that reads 'Shawn Strong'.

Shawn Strong  
President