



Idaho Noxious Weed Control Association

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August 5, 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 02.06.09.

The INWCA is opposed to the listing of palmer amaranth. Palmer amaranth is documented as being resistant to many herbicides. This creates a question of how we would control the noxious weed short of mechanically or physically removing the noxious weed. County weed superintendents have limited resources and this would create more of a strain on those resources. Additionally, if it was listed and a county was mandated to complete enforcement of the noxious weed, it tends to grow mainly in irrigated agriculture which is also private property. This creates an uneasy tension if a noxious weed superintendent has to quarantine and destroy a portion of a private property owner's field.

The INWCA supports the listing of myrtle spurge. Due to the different opinions amongst our membership and even the board of directors regarding the listing, we would suggest a containment category listing. Unlike palmer amaranth this noxious weed does respond to mechanical and chemical treatments creating a vehicle for eradication or at the very least control.

Additionally, the INWCA Board of Directors supports incorporating suggested language in the EDRR classification that was suggested. Finally, the INWCA Board of Directors supports moving the Turkish Thistle to the control category from EDRR.

We appreciate the ability to comment on the changes to the noxious weed rule.

Sincerely,

Shawn Strong
President

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

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