## **Noxious Weed Department**

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

Dear Mr. Knight,

Below are my comments for the negotiated rulemaking for Invasive species and noxious weeds.

I am opposed to listing Palmer amaranth on the noxious weed list. While it is known to be an invasive and aggressive weed, I see it's resistance to almost every class of herbicide as a huge problem. Should a County need to do an enforcement, how would we do it? I can't see being able to hire enough people to go into fields and pull it all up. I also think there may be some reluctance from Counties under Idaho Code 22-2405(4), to mechanically control it which could destroy crops, or under Idaho Code 22-2406(b), quarantine a field Palmer amaranth has infested or under Idaho Code 22-2406(d) stop the movement of infested items like combines.

I am neutral on adding Myrtle spurge to the noxious weed list. I am not aware of any of it in Latah County. If a County is concerned about Myrtle spurge, they can always add it to the County's noxious weed list.

I support removing Turkish thistle from the EDRR weed list category and moving it to the Control or Contain category. It is obvious that Turkish thistle can not be eradicated, so it only makes sense to move it to a different category.

I also support the posed language addition to the EDRR weed list.

Thank you for the opportunity to comment on the proposed changes to the noxious weed rules and to participate in the rulemaking process.

Best Regards,

Alan Martinson

Latah County Weed Superintendent.