



**Idaho Weed Control Association**  
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September 20, 2019

Brian Oakey, Deputy Director  
Idaho State Department of Agriculture  
PO Box 7274  
Boise, Idaho 83707

Dear Mr. Oakey,

The Idaho Weed Control Association (IWCA) represents local landowners, county, state and federal agencies that are dedicated to the control of noxious weeds in Idaho. The organization works closely with the rules promulgated by the Idaho State Department of Agriculture in identifying and eradicating noxious weeds.

The IWCA supports the negotiated rulemaking process related to the rules governing Invasive Species (02.06.09), Noxious Weeds (02.06.22), and Noxious Weed Free Forage and Straw Certification program (02.06.31). It appears that substantive changes have not been proposed in the new rule, but rather a consolidation of these independent rules into a single rule has occurred.

The IWCA supports the implementation of the proposed new rule, 02.06.09 Rules Governing Invasive Species and Noxious Weeds.

Sincerely,

Terry Lee, President  
Idaho Weed Control Association