



IDAHO HAY AND FORAGE ASSOCIATION, INC.

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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 Hay and Forage Association (IHFA) represents hay and forage producers and allied industry members throughout the state of Idaho. A number of IHFA members participate in the Noxious Weed Free Forage and Straw Certification program. This unique program allows producers to competitively market their forage and straw crops by completing a certification program through the Idaho State Department of Agriculture.

The IHFA supports the negotiated rulemaking process related to the rules governing the 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 this rule with Noxious Weed Rules and Rules Governing Invasive Species into a single rule. Further, the update of North American Invasive Species Management Associations (NAISMA) documents due to incorporation by reference in the new rule will help provide clarity for producers and government officials. The addition of the term straw to the rule will also provide an updated version of the rule.

The IHFA would support the implementation of the proposed new rule, 02.06.09 Rules Governing Invasive Species and Noxious Weeds, which includes the Weed Free Forage and Straw Certification Rules.

Sincerely,

A handwritten signature in black ink that reads "Will Ricks". The signature is written in a cursive, slightly slanted style.

Will Ricks, President
Idaho Hay and Forage Association