



Idaho Noxious Weed Control Association

55 SW 5th Ave., Ste. 100 | Meridian, ID 83642 | PH: 208-888-0988 | FX: 208-888-4586

July 20, 2020

Brian Oakey, Deputy Director
Idaho State Department of Agriculture
PO Box 7249
Boise, Idaho 83707

Mr. Oakey,

The Idaho Noxious Weed Control Association (INWCA) represents local landowners, county, state and federal agencies dedicated to the control of noxious weeds in Idaho. INWCA works closely with the rules promulgated by the Idaho State Department of Agriculture (ISDA) in identifying and eradicating noxious weeds using a range of methods, one of those being chemical applications in an appropriate manner. The INWCA supports the regulations that applicators are properly licensed and meet all the requisite requirements before being able to hold an applicator's license.

ISDA has recently proposed several amendments to the Rules Governing Pesticide and Chemigation Use and Application, IDAPA 02.03.03. Included in those proposed rule amendments are the elimination of the wind speed velocity rule and the addition of a new professional applicator category titled the Apprentice Applicator.

The INWCA requests that the wind speed rule remain in place to provide uniformity and a basic threshold for applicators to follow. This rule has historically restricted applicators from applying chemicals when wind speeds have exceeded 10 miles per hour. This rule has provided a standard for private applicators and professional applicators to know when to apply pesticides. The alternative that we would be pursuing is that each individual would need to read each chemical label to determine what the appropriate wind speed would be for the selected chemical. This can potentially cause confusion, inconsistency and would likely require more hands on enforcement.

The INWCA supports the new Apprentice Applicator professional category. This category will give individuals the opportunity to learn on the job skills while being under the supervision of a professional applicator. Prior to being able to apply chemicals as an Apprentice Applicator, the individual will need to complete the core competency exam to have a basic understanding of the procedures and guidelines in applying chemicals.

Thank you for the opportunity to submit comments on these proposed rule changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Lee", is written over a light blue horizontal line.

Terry Lee, President
Idaho Noxious Weed Control Association

INWCA/Corres2020/Oakey_PesticideComments