



Idaho Noxious Weed Control Association

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August 13, 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 agency rules that maintain that applicators are properly licensed and meet all the requisite requirements before being able to apply chemicals.

ISDA proposed several amendments to the original draft of the Rules Governing Pesticide and Chemigation Use and Application, IDAPA 02.03.03. Included in those proposed rule amendments is the addition of a wind speed velocity rule.

INWCA supports this amendment to the proposed rules. The amendment provides more flexibility for applicators. Rather than have a flat prohibition in applying chemicals in winds speeds greater than 10 miles per hour, the rule allows the application of chemical or fertilizers by injection or impregnated granules according to label directions that could occur in wind speeds greater than 10 miles per hour. Further, the rule provides a clear standard for applicators to follow when they are 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#2