



August 12, 2020

Brian Oakey
Deputy Director
Idaho State Department of Agriculture
2270 Old Penitentiary Road
Boise, ID 83712

Delivered Via Email

Dear Mr. Oakey,

The Idaho Sugarbeet Growers Association (ISGA) represents approximately 540 sugarbeet growers across Idaho. Our mission is to promote the interests of the sugarbeet industry to ensure the efficient, successful, safe and profitable production of sugarbeets.

ISGA appreciates Idaho State Department of Agriculture (ISDA) working on negotiated rulemaking on the Rules Governing Pesticide and Chemigation Use and Application, IDAPA 02.03.03. Pesticides are a vital tool for sugarbeet farmers, and it is important the rules regarding their applications be clear and concise for applicators, as well as farm workers and the public.

We support the decision by ISDA to eliminate low flying restrictions in the rule, and instead defer to FAA's long-held regulatory authority over aircraft. 14 CFR §91.119, 14 CFR §137.49 and 14 CFR §137.51 sufficiently address minimum safe altitudes and operations over congested areas that may be of concern to some individuals. Regulating flight paths, altitude, and general aviation methods should remain with the FAA. We also believe this approach will add greater protections to farm workers since the federal regulations are either equivalent or more stringent than restrictions previously found in IDAPA 02.03.03.310.

Thank you for the work ISDA is doing to improve IDAPA 02.03.03 through negotiated rulemaking.

Sincerely,

A handwritten signature in black ink that reads "Brad Griff". The signature is written in a cursive, flowing style.

Brad Griff
Executive Director
Idaho Sugarbeet Growers Association