

**From:** [Adam Schroeder](#)  
**To:** [Rulesinfo](#)  
**Cc:** [Dave Wenk](#) ; [Bonnie Davis](#); [Kali Sherrill](#); [Alan Martinson](#); [Paxti Larrocea-Phillips \(patxi@amgidaho.com\)](#)  
**Subject:** {External}IANCWS Rulemaking Comment - IDAPA 02.06.09, NWFFS Fees  
**Date:** Tuesday, May 18, 2021 12:23:25 PM  
**Attachments:** [image003.png](#)  
[IDAPA 02.06.09 IANWCS NWFFS FEE COMMENT 05182021.pdf](#)

---

Hello,

On behalf of the Idaho Association of Noxious Weed Control Superintendents (IANWCS), I would like to present the attached comment for consideration in the negotiated rulemaking process for IDAPA 02.06.09 strawman proposal.

We are proposing to increase the fees associated with Noxious Weed Free Forage and Straw inspections. Drafts of this comment have been distributed to forage and straw stakeholders through the Associated Management Group. IANWCS has not received feedback related to the distribution of the comment.

Please also note that IANWCS is open to editing the language on p. 28 (320. Voluntary Noxious Weed Free Forage and Straw Certification Program, 16. Certification Fees) of the IDAPA 02.06.09 strawman (with the increase included) to create clarity, as the current passage can be difficult for some to interpret accurately.

IANWCS would also like the record to reflect that the proposed increases are for voluntary user fees, and are not part of an effort to increase fees for mandatory services.

Respectfully,

Adam Schroeder  
Vice Chair  
IANWCS



**Adam Schroeder**  
**Director**  
**Ada County Weed, Pest and Mosquito Abatement**  
975 E. Pine Ave.  
Meridian, Idaho 83642  
(208) 573-7861 Cell  
(208) 577-4646 Office