



Idaho Noxious Weed Control Association

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June 18, 2021

Lloyd Knight
Idaho State Department of Agriculture
PO Box 7249
Boise, Idaho 83707

Mr. Knight,

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 wide range of control methods. The INWCA appreciates the opportunity to comment on the current strawman that reflects the proposed changes to IDAPA 02.06.09 – *Rules Governing Invasive Species and Noxious Weeds*.

Following the May 21, 2021 negotiated rulemaking, the INWCA is still in support of the current proposal by the Idaho Association of Noxious Weed Control Superintendents (IANWCS) that would raise the fees for inspections relating to Noxious Weed Free Forage and Straw. These inspections can be completed by county weed superintendents. As a result, the cost of the inspection can vastly outweigh the receipts that are collected from the inspections and as a result affect the county weed superintendents' budget. The INWCA stands in support of the proposal as presented by the IANWCS. It is noteworthy to reflect that the proposed increases are for voluntary user fees, and are not part of an effort to increase fees for mandatory services.

Additionally, the INWCA does not oppose any of the changes that are presented in IDAPA 02.06.09 – *Rules Governing Invasive Species and Noxious Weeds* as it is currently drafted for the June 18, 2021 negotiated rulemaking meeting.

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

Sincerely,

A handwritten signature in black ink that reads 'Terry Lee'. The signature is written in a cursive style with a large, sweeping 'L'.

Terry Lee
President