From: <u>Jeffrey Bryant</u>
To: <u>Andrea Thompson</u>

Cc: Chanel Tewalt; Lloyd Knight; Stevie Harris

Subject: Re: {External}Re: {External}Questions regarding IDAPA 02.06.05 Plant Disease and Quarantines

Date: Monday, March 7, 2022 2:08:05 PM

It appears to me that the Department is more comfortable with inspecting "bootleg" garlic from non-quarantine counties (possibly by inexperienced inspectors) than it is to allow garlic from the Pullman ARS NPGS, which is managed by personnel that are very familiar with allium diseases. The proposed wording may prompt growers to import garlic from out of state to non-quarantine counties so it can later be sold in quarantine counties. I would rather trust the Pullman ARS NPGS garlic.

Could wording in 250.04 be added to include Whitman County, Washington in addition to Malheur County, Oregon?

On Mon, Mar 7, 2022 at 12:30 PM Andrea Thompson < <u>Andrea.Thompson@isda.idaho.gov</u>> wrote:

Understood. This is valid point and worthy of taking time to discuss at the meeting.

Feel free to reach back if you have anything else. Looking forward to your participation.

Thank you,

Andrea Thompson

Section Manager-Field Services

Idaho State Department of Agriculture

208.332.8622 office

Andrea.Thompson@isda.idaho.gov

From: Jeffrey Bryant < bryajw@gmail.com > Sent: Monday, March 7, 2022 11:34 AM

To: Andrea Thompson < <u>Andrea.Thompson@ISDA.IDAHO.GOV</u>>

Cc: Chanel Tewalt < Chanel. Tewalt@ISDA.IDAHO.GOV >; Lloyd Knight

<<u>Lloyd.Knight@ISDA.IDAHO.GOV</u>>; Stevie Harris

<<u>Stevie.Harris@ISDA.IDAHO.GOV</u>>

Subject: {External} Re: {External} Questions regarding IDAPA 02.06.05 Plant Disease and

Quarantines

I plan to participate in the meeting. It seems to me that there should be a way to get

clean/inspected stock from the germ plasm site without having to go through the U of I. Idaho has a fine climate for growing hard neck garlic, but current rules prevent us from affordably trying additional varieties.

On Mon, Mar 7, 2022 at 10:55 AM Andrea Thompson < Andrea. Thompson@isda.idaho.gov > wrote:

Hello Jeff,

This is a good question and glad to hear from you. The quick answer to your question is, no, this is not an alternative laboratory option for obtaining aseptic material. The intent with this additional language is to offer Idaho growers located outside of the quarantine zone the option to obtain an exemption to sell vegetative material field inspected by the department into the designated counties. There have been multiple requests over the past few years from exemption-holding growers and others wanting to obtain an exemption based on field inspection outside of the designated counties to produce clean stock eligible for sale within the quarantine zone. This language should address that concern and offer an additional avenue beyond laboratory testing only for movement of clean stock into the quarantine zone.

As this is simply department proposed language, it is not final and is subject to change through the negotiated rulemaking process. Your participation at these meetings is requested. Should you be unavailable and would like to submit a formal response to be shared, please email that information to: rulesinfo@isda.idaho.gov.

Thank you,

Andrea Thompson

Section Manager-Field Services

Idaho State Department of Agriculture

208.332.8622 office

Andrea.Thompson@isda.idaho.gov

From: Jeffrey Bryant < bryajw@gmail.com > Sent: Monday, March 7, 2022 4:39 AM

To: Rulesinfo < <u>rulesinfo@ISDA.IDAHO.GOV</u>>

Subject: {External} Questions regarding IDAPA 02.06.05 Plant Disease and Quarantines

In Section 250.03 it is proposed that the words "or field inspected by the Department

during active growth" be added. The USDA Agricultural Research Service (ARS) National Plant Germplasm System (NPGS) for garlic is located in Pullman, Washington. Does the Department intend to perform field inspections of garlic at the Pullman ARS NPGS during active growth, so their garlic can be distributed to growers without being produced under aseptic conditions at the University of Idaho? If so, will individual growers or the Department be responsible for the cost of such inspection?