



## Idaho Noxious Weed Control Association

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Lloyd Knight  
Rules Review Coordinator  
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 prevention and 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 proposed changes to IDAPA 02.06.09 – *Rules Governing Invasive Species and Noxious Weeds*.

INWCA is in support of the listing of Cogon grass (*Imperata cylindrica*) on the Statewide Noxious Weed List in the Early Detection Rapid Response category. This plant concerns vegetation managers because of its ability to spread rapidly and suffocate other native species in the landscape. Additionally, the species is extremely flammable due to the oils in the grass blades and creates an increased fire risk. Cogon grass finds itself in the top ten list of worst weeds in the world and is now being found in Idaho. Due to its small infestation at this time and the traits associated with the species, it is fitting to place it in the EDRR category.

Additionally, the INWCA does not oppose any of the additional changes that are presented in IDAPA 02.06.09. The INWCA supports comments proposed by Alan Martinson that further define the Early Detection Rapid Response category. The INWCA would propose clarifying the language to the following statement: "*Noxious weeds listed in the EDRR list are known to exist in finite or small populations in the state.*"

Finally, during the first rulemaking session there was stakeholder comments made regarding the listing of the Japanese Yew. The INWCA stands in opposition to the listing of the Japanese Yew on the noxious weed list. Just because it is poisonous does not mean that it should be listed as noxious or invasive. The Japanese Yew does not have the tendency to spread quickly and is commonly used in landscaping. Thank you for the opportunity to submit comments on the proposed rule changes.

Sincerely,

Shawn Strong  
President

INWCA/2021ISDANegotiatedRulemaking/INWCA\_02.06.09InvasiveNoxious\_Comments