



## Idaho Noxious Weed Control Association

55 SW 5th Ave., Ste. 100 | Meridian, ID 83642 | PH: 208-888-0988 | FX: 208-888-4586  
June 28, 2023

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 a membership dedicated to the control of noxious weeds and invasive species in Idaho. Those members are made up of private property owners and individuals employed by a local, state, or federal entity, or by a tribe. The common denominator is that all members have an interest in vegetation management across Idaho and a vast majority hold an applicator's license in Idaho.

The INWCA supports the option of increasing credit hours to 16 credits while reducing the time limit for each credit hour from 60 minutes to 50 minutes. This would have the net effect of reducing a licensed applicator's time in classes from 900 minutes to 800 minutes over a two-year period. Additionally, this would create more opportunity for an applicator to attend another class with the addition of one credit hour. This benchmark more similarly situates Idaho to surrounding states. Therefore, the INWCA agrees with this change to the administrative rule.

Next, the INWCA has struggled with the strict sideboards set around the application deadline. Building flexibility into the application process with accountability and foresight should provide opportunities for stakeholders to hold recertification seminars for applicators with the proper accreditation. The INWCA urges the adoption of language that creates a baseline for recertification seminars to apply for credit. INWCA would suggest the baseline is thirty (30) days for an application to be submitted. However, INWCA urges flexibility in the process so that an application can be amended if needed before the conference is held. This should be reflected in rule since there have been occasions where the INWCA did apply for credit in a timely manner and had one late abstract come in a week after the deadline, but it was not considered for credit. INWCA suggested and recommends the following language:

*To request accreditation for a seminar not provided by the Department, an applicant must submit an application to the department not less than thirty (30) days prior to the*

*scheduled seminar. Applications received not less than thirty (30) days prior to the scheduled seminar shall receive preference for credit approval and said applications shall have the ability to amend their application prior to the scheduled seminar. Applications received after the thirty (30) days shall be reviewed at the discretion of the Department and may not receive credit.*

Finally, the INWCA would request that ISDA remain with the current framework where there is no mandatory category specific training. The INWCA has logistical concerns about how this would be implemented for current stakeholders and the burden on companies, organizations or entities that are providing recertification credits. Further, because there is such a vast number of categories, we have concerns that it would be difficult to find instructors that would continually and consistently provide credit for each category. Therefore, INWCA would request that we maintain the current system without category specific training.

The INWCA appreciates the opportunity to comment on the administrative rules.

Sincerely,

Shawn Strong  
President