

**IDAHO STATE DEPARTMENT OF AGRICULTURE ("ISDA")
PETITION TO INITIATE RULEMAKING**

All rulemaking petitions must substantially comply with IDAPA 04.11.01.820, which addresses petitions to initiate rulemaking as described by Section 67-5230, Idaho Code. The requirements have been laid out below. ISDA will consider all petitions and act to either initiate or deny rulemaking in accordance with I.C. § 67-5230(1) and IDAPA 04.11.01.821.

Please note that ISDA may only conduct rulemaking within the authority provided it by statute in order to govern the department's jurisdiction. *See* I.C. § 22-101(3). Prior to petitioning ISDA, please verify and understand the authority of ISDA as it relates to the petition's desired outcome. If a petition for rule change is outside of ISDA's legal authority, it will be denied.

Name of petitioner(s): Clarke Alder, MS, Weed Scientist, Amalgamated Sugar

Address of petitioner: 1951 South Saturn Way Suite 100, Boise, ID 83709

Phone number of petitioner: 208-989-7400

Email address of petitioner: calder@amalsugar.com

Petitioner's interest in matter:
I am a Research Agronomist and Weed Scientist working with 182,000 acres of sugarbeets in ID/OR.
Palmer amaranth is a substantial threat to weed control efforts in sugarbeet and other agronomic crops.
These pigweeds have been found in Idaho - can cause large yield losses.

Describe the nature of the rule or amendment to the rule and the petitioner's suggested rule or amendment: Please add Palmer amaranth (*Amaranthus palmeri*) to the state noxious weed list for EDRR and/or controlling and containing.

Name of the statute, order, rule or other controlling law:
Idaho State Noxious Weed Listing

Factual allegations upon which the petitioner relies to support the proposed rulemaking:
PA is native to the desert southwest and northern Mexico. It is a pigweed now adapted to agricultural systems.
PA has been known to be resistant to up to 11 modes of action, including groups 14, 9, and 2.
PA was discovered at a significant scale across southern ID and eastern OR in 2023 with 5 populations already in growers' fields. PA is an annual that can significantly decrease yields in many agronomic crops.

Citations of cases and/or statutory provisions that apply (optional):

