

# The Idaho Association of WEED CONTROL SUPERINTENDENTS

**Chair:**  
**Daniel Bertram**  
Lemhi County  
200 Fulton St. Ste 201  
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(208)-756-2815 x282

**Vice- Chair:**  
**Bryce Fowler**  
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151 W 1<sup>st</sup> North  
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(208) 624-7442

**Secretary – Treasure:**  
**Bonnie Davis**  
Washington County  
PO Box 865  
Weiser ID 83672  
(208)-414-1950

June 24, 2013

Matt Voile  
Idaho State Department of Agriculture  
2270 Old Penitentiary Road  
P.O. Box 790, Boise, Id. 83701

Dear Matt,

This letter is in regards to the ISDA Rulemaking Process 02.06.09 Rules Governing Invasive Species, 02.06.22 Noxious Weed Rules and 02.06.23 Noxious Weed Free Gravel and Rock Product Rules, with a specific emphasis on the impact that will be had on the Weed Superintendents represented by the Idaho Association of Weed Control Superintendents.

Thank you for giving us the opportunity to comment on this rule making process, I have sent a request to all members within our association and there have been no concerns expressed in regards to the rules Governing Invasive Species 02.06.22 and the Noxious Weed Rules 02.06.23 There has been discussion regarding the Noxious Weed Free Gravel and Rock Product Rules.

The topic of certified gravel has been discussed within our association on numerous occasions over the past two years. The primary driving force has been the requirement that agencies both State and Federal have placed on contractors requiring that gravel and rock products be certified as weed free. Currently there is not a specific guideline on how to certify such material and therefore our association requested the Idaho State Department of Agriculture consider reviewing the need for certified weed free gravel, (this request was sent on February 26<sup>th</sup>, 2013 to Director Gould). While there are no specific concerns as to the language written with the Noxious Weed Free Gravel and Rock Product Rules our association remains dedicated to ensuring that any additional certification process is done so in good faith. With the intent of preventing noxious and invasive weed dispersal, while taking into account the producer's ability to produce such a product in a fair and unbiased manner.

We look forward to working with you through this process and please don't hesitate to contact either myself or any member of our association should you have any questions.

Sincerely

A handwritten signature in black ink, appearing to read 'Dan Bertram', is written over a horizontal line.

Daniel Bertram  
IAWCS – Chairman  
Lemhi County Weed Superintendent

## Angel O'Brien

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**From:** Sean Costello  
**Sent:** Wednesday, June 19, 2013 1:41 PM  
**To:** Angel O'Brien  
**Subject:** FW: Opportunity to comment on draft rules

Please print this for the file? Thanks!

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**From:** Lloyd Knight  
**Sent:** Wednesday, June 19, 2013 1:18 PM  
**To:** Matt K. Voile; Environmental Care Association of Idaho (ECA); Food Producers of Idaho (FPI); Idaho Alfalfa and Clover Seed Growers Association; Idaho Aquaculture Association (IAA); Idaho Association of Weed Control Superintendents; Idaho Cattle Association (ICA); Idaho Crop Improvement Association, Inc. (ICIA); Idaho Farm Bureau; Idaho Grain Producers Association (IGPA); Idaho Nursery and Landscape Association (INLA); Idaho Potato Commission; Idaho Water Users Association, Inc. (IWUA); Idaho Weed Awareness Campaign; Idaho Weed Control Association; Idaho Weed Coordinating Committee; Idaho-Eastern Oregon Onion Committee; Idaho-Eastern Oregon Seed Association (IEOSA); Office of Energy ; Sean Costello; Southwest Idaho Weed Control Association; University of Idaho Extension; University of Idaho Gov. Affairs; University of Idaho Scientist; Rich Garber ([rgarber@uidaho.edu](mailto:rgarber@uidaho.edu)); Hutchinson, Pam; Dandurand, Louise-Marie; Marschman, Brian L - APHIS  
**Cc:** Brian Oakey; Thomas E. Woolf; Matt Kreizenbeck; Nicholas Zurfluh; Stephen L. Cox; Gaillyn Jorgensen  
**Subject:** RE: Opportunity to comment on draft rules

A reminder that minutes, preliminary draft rules, and other rulemaking materials for the Noxious Weed, Noxious Weed Free Gravel, and Invasive Species rules are posted at the link below. Also, we have rulemaking meetings scheduled for Wednesday and Thursday of next week. You can review the rulemaking notices for each rule to see the schedule day and time.

[http://www.agri.idaho.gov/Categories/LawsRules/sub\\_rules/Rulemaking.php](http://www.agri.idaho.gov/Categories/LawsRules/sub_rules/Rulemaking.php)

Thanks, and let us know if you have any questions.

Lloyd B. Knight, Administrator  
Division of Plant Industries  
Idaho State Department of Agriculture  
Office: (208) 332-8664

## Angel O'Brien

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**From:** Sean Costello  
**Sent:** Wednesday, June 12, 2013 1:36 PM  
**To:** Angel O'Brien  
**Subject:** FW: Rule Making - Modification of 02.06.22 to Add Water Hyacinth to the Statewide EDRR Noxious Weed List

Please print for the record. Thanks!

Sean Costello  
Deputy Attorney General  
Idaho State Department of Agriculture  
(208) 332-8504

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**From:** Matt K. Voile  
**Sent:** Wednesday, June 12, 2013 1:35 PM  
**To:** Sean Costello  
**Subject:** FW: Rule Making - Modification of 02.06.22 to Add Water Hyacinth to the Statewide EDRR Noxious Weed List

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**From:** Parrish,David [<mailto:david.parrish@idfg.idaho.gov>]  
**Sent:** Wednesday, June 12, 2013 1:34 PM  
**To:** Matt K. Voile  
**Cc:** Lloyd Knight; Dillon,Jeff  
**Subject:** Rule Making - Modification of 02.06.22 to Add Water Hyacinth to the Statewide EDRR Noxious Weed List

Matt,

Because water hyacinth can out-compete native riparian vegetation that is important for many species of both game and nongame fish and wildlife, we have an interest in your rule-making to remove water hyacinth from the "Statewide Monitor List" in IDAPA 02.06.22.100.04 and move it to the "Statewide EDRR Noxious Weed List" in IDAPA 02.06.22.100.01. The recent discovery of water hyacinth in the mid-Snake River emphasizes the importance of elevating this potential invasive species to prevent further colonization in Idaho waters.

Let me know what we can do to assist in this change in your rule making process.

Thanks,

David Parrish  
Idaho Dept. of Fish and Game  
Sport Fishing Program Coordinator

## Angel O'Brien

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**From:** Sean Costello  
**Sent:** Friday, June 07, 2013 8:16 AM  
**To:** Angel O'Brien  
**Subject:** FW: Opportunity to comment on draft rules

Please print this for each of the three rule files listed below. Thanks!

Sean Costello  
Deputy Attorney General  
Idaho State Department of Agriculture  
(208) 332-8504

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**From:** Lloyd Knight  
**Sent:** Wednesday, June 05, 2013 4:58 PM  
**To:** Matt K. Voile; Environmental Care Association of Idaho (ECA); Food Producers of Idaho (FPI); Idaho Alfalfa and Clover Seed Growers Association; Idaho Aquaculture Association (IAA); Idaho Association of Weed Control Superintendents; Idaho Cattle Association (ICA); Idaho Crop Improvement Association, Inc. (ICIA); Idaho Farm Bureau; Idaho Grain Producers Association (IGPA); Idaho Nursery and Landscape Association (INLA); Idaho Potato Commission; Idaho Water Users Association, Inc. (IWUA); Idaho Weed Awareness Campaign; Idaho Weed Control Association; Idaho Weed Coordinating Committee; Idaho-Eastern Oregon Onion Committee; Idaho-Eastern Oregon Seed Association (IEOSA); Office of Energy ; Sean Costello; Southwest Idaho Weed Control Association; University of Idaho Extension; University of Idaho Gov. Affairs; University of Idaho Scientist; Rich Garber ([rgarber@uidaho.edu](mailto:rgarber@uidaho.edu)); Patrick Kole  
**Cc:** Brian Oakey; Thomas E. Woolf; Matt Kreizenbeck; Nicholas Zurfluh; Stephen L. Cox; Gaillyn Jorgensen; Sean Costello  
**Subject:** RE: Opportunity to comment on draft rules

Just a reminder that these rulemaking notices published today in the Administrative Bulletin. You will want to review the notices (<http://adminrules.idaho.gov/bulletin/2013/06.pdf>) to see the meetings scheduled for next week, followed by 2<sup>nd</sup> meetings for each of the three rules later in June.

Thanks and let Matt or myself know if you have any questions.

Lloyd B. Knight, Administrator  
Division of Plant Industries  
Idaho State Department of Agriculture  
Office: (208) 332-8664

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**From:** Matt K. Voile  
**Sent:** Friday, May 24, 2013 2:45 PM  
**To:** Environmental Care Association of Idaho (ECA); Food Producers of Idaho (FPI); Idaho Alfalfa and Clover Seed Growers Association; Idaho Aquaculture Association (IAA); Idaho Association of Weed Control Superintendents; Idaho Cattle Association (ICA); Idaho Crop Improvement Association, Inc. (ICIA); Idaho Farm Bureau; Idaho Grain Producers Association (IGPA); Idaho Nursery and Landscape Association (INLA); Idaho Potato Commission; Idaho Water Users Association, Inc. (IWUA); Idaho Weed Awareness Campaign; Idaho Weed Control Association; Idaho Weed Coordinating Committee; Idaho-Eastern Oregon Onion Committee; Idaho-Eastern Oregon Seed Association (IEOSA); Office of Energy ; Sean Costello; Southwest Idaho Weed Control Association; University of Idaho Extension; University of Idaho Gov. Affairs; University of Idaho Scientist  
**Cc:** Lloyd Knight; Brian Oakey; Thomas E. Woolf; Matt Kreizenbeck; Nicholas Zurfluh; Stephen L. Cox; Gaillyn Jorgensen  
**Subject:** Opportunity to comment on draft rules

Dear Colleagues and Interested Parties

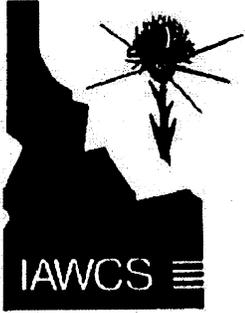
You are receiving this email containing three (3) Notices of Intent to Promulgate Rules and the initial draft of the three corresponding rules for your review and comment. Attached please find Notices and draft rules for;

- Noxious Weed Rules (IDAPA 02.06.22)
  - Certified Noxious Weed Free Gravel and Rock Products Rules (New-IDAPA 02.06.23)
  - Rules Governing Invasive Species (IDAPA 02.06.09)
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If you are interested in commenting on the draft rule(s), or would like to attend one of the scheduled meetings please review the corresponding notice for directions on comment submission, dates, times, and locations of scheduled meetings.

Thank you for your participation. We look forward to seeing you at an upcoming meeting.

Matt Voile  
Section Manager  
Noxious Weed/Invasive Species Program  
Idaho State Department of Agriculture  
2270 Old Penitentiary Rd  
Boise, Id 83712  
208-332-8667  
[matt.voile@agri.idaho.gov](mailto:matt.voile@agri.idaho.gov)



# The Idaho Association of WEED CONTROL SUPERINTENDENTS

**Chair:**  
**Daniel Bertram**  
Lemhi County  
200 Fulton St. Ste 201  
Salmon ID 83843  
(208)-756-2815 x282

**Vice- Chair:**  
**Bryce Fowler**  
Fremont County  
151 W 1<sup>st</sup> North  
St. Anthony ID 83445  
(208) 624-7442

**Secretary – Treasure:**  
**Bonnie Davis**  
Washington County  
PO Box 865  
Weiser ID 83672  
(208)-414-1950

May 24, 2013

Matt Voile  
Idaho State Department of Agriculture  
2270 Old Penitentiary Road  
P.O. Box 790, Boise, Id. 83701

Re: Recommendations for the noxious weed list

Matt,

Thank you for giving the Idaho Association of Weed Control Superintendents the opportunity to provide recommendations on species addition or removal from the noxious weed list currently housed under 02.03.22 Noxious Weed Rules.

A request was sent to each of the six regions within our associations asking for input regarding this topic. Each region provided comments with regards to species that have a potential impact within their geographic areas of responsibility. However, when each species was considered from a statewide level, the general consensus was to recommend that no changes be made to the list, with the exception of two criterions already under consideration.

1. The two species currently proposed and listed under the temporary listing, *Solanum sisymbriifolium* and *Eichronia crassipes*, of which our association is in favor of officially listing.
2. We also encourage consideration of the Governor's plan for addressing impacts regarding Sage grouse to include invasive annual grasses. While we do not feel it appropriate to list these species under the current criteria we do feel another classification may be in order.

Our association is meeting on July 20<sup>th</sup> and this topic regarding the noxious weed list has been placed on the agenda. At this time we will evaluate the need for addition or the removal of species from the noxious weed list to be taken into consideration during the 2015<sup>th</sup> Legislative cycle.

Once again, I would like to thank you for giving us the opportunity to comment and provide input. If our association may help in anyway don't hesitate as we look forward to working with you in the future. In addition, if you have any comments or recommendations on potential species that we should address during our July meeting please let us now.

Sincerely

Daniel Bertram  
IAWCS – Chairman  
Lemhi County Weed Superintendent  
200 Fulton St. Suite 201  
Salmon, Id. 83467  
(208)756-2815 ext 282