



Idaho Wildlife Federation

(208) 342-7055 – PO Box 6426 Boise, ID 83707 – www.idahowildlife.org

Brian J. Oakley, Deputy Director
Idaho State Department of Agriculture
PO Box 790
Boise, Idaho 83701

Re: Idaho Wildlife Federation comments on Rules Governing Noxious Weeds (IDAPA 02.06.22)

July 10, 2017

To Deputy Director Oakley,

We believe Option A to be the most appropriate measure to protect the wildlife resource of the state of Idaho. Listing Japanese and English Yew on the statewide containment list and managing them accordingly will stop the spread of new yew populations into the Wildland Urban Interface (WUI) where all yew related animal deaths occur while also providing flexibility of management prescriptions by local authorities.

Idaho code 22-2402(17) specifically defines “Noxious weeds” as “any plant having the potential to cause injury to public health, crops, livestock, land or other property...” Considering that Idaho wildlife is property of the state and human or cattle consumption of the yew plant is lethal, this definition is without a doubt appropriate.

We acknowledge County Weed Superintendents have limited resources. However, the yews are not aggressive or invasive. They are planted and contained on private properties making management and control relatively easy compared to “higher priority” weeds. The flexibility provided by Option A will allow for multiple and pragmatic solutions that will take into consideration time sensitivity needed to manage other more aggressive noxious weeds, identify high risk locations for removal, and other control methodologies.

Other ornamental plants used as backyard gardening are already on the same statewide containment list. So, there is already precedent for adding ornamental plants like Japanese and English Yew.

Thank you for considering our comments. We look forward to participation in the rulemaking process as it continues and assisting when needed.

Sincerely,

Brian Brooks
Executive Director