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> Dear M. Schumacher and M. Cosio,

> My name is Bill Mason, and I'm a resident in Lane County. I  
> understand that you are asking for input on the following questions:

1. Should Lane County Department of Public Works use limited herbicides from the "approved permitted products list" as part of an integrated roadside vegetation management program?
2. Should Lane County be responsible to manage noxious and invasive plant species within Lane County rights-of-way?

I have a background in contaminant fate and transport, toxicology, and assessing risks of environmental contaminants to human health and the environment. I was pleased when Lane County established a policy about 4 years ago of using herbicides *\*only\** as a last resort. I also appreciate the County's efforts to date to identify and implement a series of preventative and non-chemical weed control techniques.

I would like to submit comments to your two questions as follows:

Question 1: Please use herbicides for vegetation management *\*only\** as a last resort, after you have tried--multiple times--to use non-chemical or preventative techniques. Also, I ask that you simply control areas with an intractable weed population, rather than attempt to completely eradicate them using herbicides. Perfection (i.e., complete eradication of Himalayan blackberry) should not be the goal alongside of the 2,600+ miles of road in Lane County. This approach is neither cost effective or healthy for human health and the environment. Even supposedly "non-persistent" herbicides result in unintended exposures to non-target plant and animal species. This is widely supported not only in the medical literature, but also in reports of fish and bird kills to the Oregon Emergency Response System.

Question 2: Yes. Lane County has a responsibility to *\*manage\** noxious and invasive plant species within Lane County's rights-of-way. However, this does not mean that you have to necessarily apply herbicides to eliminate *\*all\** weeds at the expense of human health or the environment. Just keep them away from the roads, and target new weed populations in areas away from the road so that they do not become well established.

You did not ask the question about the cost effectiveness of various techniques of various weed management techniques, but nonetheless I'll provide the following comment along those lines:

Please only use herbicides as a *\*last resort\** when attempting to manage weeds along Lane County roads. I especially urge you to use non-chemical and preventative control techniques, even if it is initially seemingly more expensive. Until we can reliably incorporate non-monetary effects into our decisions (such as fish kills or subtle ecological effects due to herbicide use), we should be cautious when using hazardous substances to control weeds.

Thank you for the opportunity to comment on your herbicide-use plans.

Bill Mason