

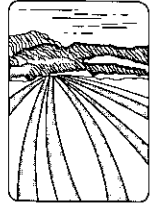


Oregon

Theodore R. Kulongoski, Governor

Department of Agriculture

635 Capitol Street NE
Salem, OR 97301-2532



February 22, 2008

Lane County Department of Public Works
3040 N. Delta Hwy.
Eugene, OR. 97408-1696
Attn: Vegetation Management Coordinator – Public Comment

Dear Lane County Department of Public Works Staff:

This letter is in response to a 60-day public comment period regarding whether or not Lane County Department of Public Works should use limited herbicides from the approved permitted products list as part of an integrated roadside vegetation management program, and if Lane County should be responsible for managing noxious and invasive plant species within Lane County rights-of-way.

The Oregon Department of Agriculture, Noxious Weed Control Program (ODA) mission is to: "Protect Oregon's Natural Resources and Agricultural Economy from the Invasion and Proliferation of Exotic Noxious Weeds". ODA believes it is essential to use site-specific best management practices for control of noxious weeds that includes the use of herbicides.

Exclusion, early detection and rapid response are by far the most cost-effective ways of dealing with invasive noxious weed species. Any agency with land management authority in the State of Oregon should participate in efforts to keep invasive plant species out of the state, find invasions before they establish permanent footholds. Early detection and rapid response (EDRR) efforts make sense from both a biological and economic perspective. An economic study that was completed in 2000 revealed a 33:1 benefit to cost for these types of programs.

ODA believes Lane County should maintain its authority to use, in a responsible manner, all tools necessary to control invasive noxious weeds. Any effort to eliminate herbicides or other tools leaves downstream, downwind or neighboring counties at a disadvantage and sets a precedent for efforts to improve noxious weed control in Oregon. Manual/mechanical controls alone will not effectively address the problems with noxious weed species along our public rights-of-way.

ODA appreciates the opportunity to comment on this important issue and if you have questions or if I can be of assistance, please contact me.

Sincerely,

Tim Butler, Manager
ODA Noxious Weed Control Program
503 986-4621
FAX: 503 986-4787
tbutler@oda.state.or.us



Vegetation Coordinator:

Question #1: I believe that the county should control noxious and invasive plants on it's maintained rights-of-way. Such regularly disturbed areas are a prime breeding ground for undesirable vegetation.

Question #2: As a long-standing member of the Siuslaw Watershed Council, I believe that herbicides should only be used when absolutely necessary. Considering the delicate and under funded nature of the County's finances at this time, I'm forced to conclude that now is one of those times. Mechanical controls are just too expensive.

Sincerely;

A handwritten signature in cursive script, appearing to read "David Mills". The signature is written in black ink and is positioned to the right of the word "Sincerely;".

David Mills
PO Box 681
Florence, OR 97439 @ (541)902-8475