

## SUPPLEMENTAL MATERIAL

### Health Advisory Committee Comments on: Annual Report Lane County Roadside Integrated Vegetation Management Program (2005)

The HAC commends the Board of Commissioners for their commitment to public health and the principles of harm reduction through the adoption of Lane Code 15.500, the "Last Resort Herbicide Policy". The HAC also wants to express its appreciation to Sonny Chickering and the Public Works Department staff for their cooperation in the development and progress towards implementation of the Last Resort Policy.

The HAC strongly supports Lane Code 15.500 as written where the clear spirit and intent of the ordinance is to use herbicides as a last resort. The HAC is supportive of the efforts to develop clear action thresholds for each of the non-pesticide control methods, applied in the hierarchy of interventions, which if required may lead to a last resort situation.

The HAC is committed to addressing public health concerns, including prevention and reduction of risk. HAC has the following specific comments on the *Annual Report*:

1. HAC is concerned about the proposed miles that may be sprayed after two years without the use of herbicides. Discussions with PW staff have not indicated any critical areas that would require herbicide treatment. PW staff has also stated they were not aware of any reports of roadway safety or visibility issues that have not been successfully managed over the past two years with non-herbicidal treatment. The proposed upper limit of miles to be treated with herbicides is highly excessive based on the past two years.
2. In connection with point 1, HAC has concerns regarding the impact of the spray truck as compared to manual application for the limited areas requiring herbicidal treatment under the *Last Resort Policy*. We have not yet been presented with information justifying broad-based application. Spot applications can be targeted to any areas where treatment is needed and non-pesticide treatments were not successful.
3. The HAC is concerned that Appendix B of the *Annual Report* fails to list any of the inert ingredients and their potential for adverse human, animal and environmental sequelae. This information is available through multiple sources and has been reviewed by HAC.
4. HAC would like to encourage exploration of alternative control products from the EPA exempt list as one or more of these may be less harmful and equally effective for target pest species, keeping with the spirit and intent of the *Last Resort Policy*.

5. HAC is concerned about increasing data (2001, 2002, and 2003) regarding the carcinogenicity of one or more of the products listed in the *Annual Report*. This data may have implications for worker safety as well as residents living adjacent to treated areas.

HAC looks forward to the development of the control prescriptions as a prelude to receiving a request and opportunity to review and comment on a future permitted products list as per Lane Code 15.500. HAC looks forward to the full implementation of the Last Resort Policy as written..

Respectfully submitted,

Dr. James Lakehomer, Chair  
Health Advisory Committee