AGENDA COVER MEMO

Bow of Health

DATE: April 26, 2006

TO: Lane County Board of Commissioners sitting as the Board of Health

DEPT.: Public Works

PRESENTED BY: Orin Schumacher, Vegetation Management Coordinator

AGENDA ITEM TITLE: IN THE MATTER OF ADOPTING, BY RESOLUTION A

PERMITTED PRODUCTS LIST FOR USE OF HERBICIDES BY THE

DEPARTMENT OF PUBLIC WORKS FOR ROADSIDE

VEGETATION MANAGEMENT, IN ACCORDANCE WITH THE LAST RESORT POLICY, ORDINANCE 12-03, LANE CODE 15.510

SEC 3(A).

I. MOTION

Move Adoption of Board Order

II. ISSUE OR PROBLEM

Lane Code 15.510 Sec. 3(A) requires that the Board of Health adopt by resolution a Permitted Products list for use of herbicides by the Department of Public Works for roadside vegetation management in compliance with the Last Resort Policy, Ordinance 12-03.

III. DISCUSSION

A. Background

Lane Code 15.500 thru 15.530 and the Last Resort Policy, Ordinance 12-03, define specific requirements and regulations pertaining to the use of herbicides for vegetation management activities along roadsides. Prior to utilizing herbicides for roadside management, the Board of Health must adopt by resolution a Permitted Products list.

The Permitted Products list was presented to the Vegetation Management Advisory Committee on January 11th and to the Health Advisory Committee on February 14th. Additional discussion of the proposed list occurred on March 8th with the Vegetation Management Advisory Committee (VMAC) and on March 14th, with the Public Health Advisory Committee (PHAC). Numerous interested parties were contacted by phone and e-mail on January 17th in an effort to solicit comment and review, and the Permitted Products List was

posted on the Lane County website on January 17th, and can still be viewed at http://www.lanecounty.org/RoadMaint/PermtdProd.htm. A summary of all comments and correspondence received as a result of this outreach effort are included herein as attachment #1.

B. Analysis

The Lane County, Department of Public Works has been operating under a self-imposed moratorium on the use of herbicides along County road rights-of-way until adoption of a Permitted Products List by the Board of Health. Five herbicides are proposed by the Department of Public Works for roadside vegetation management, and the Permitted Products list includes a two-page summary of each product and all of the qualifications necessary to satisfy the requirements of Lane Code 15.510, Sec 4(a) thru (e) and Sec 5(a) thru (e)

Lane Code 15.510, sec 4(a) thru (e) requires that Permitted herbicide products must meet specific requirements, including characteristics and properties of each products such as, active ingredients, known inerts, and other additives. The requirements are listed on the first page for each of the five listed herbicides, along with their listed qualifications and considerations listed in Lane Code 15.510 Sec 5(a) thru (e).

To provide guidance to staff and transparency of the decision making process for the public, Attachment 2 of this memo contains Roadside Vegetation Management Prescriptions and Action Thresholds. The prescriptions and action thresholds provide a sequential list of treatment options for distinct vegetation management features, or conflicts, as well as for specific noxious weed species. Although the sequential arrangement of treatment options will significantly restrict herbicide use, the prescriptions do allow for the use of herbicides included in the Permitted Products List under certain circumstances, and for specific noxious weed species.

C. Alternatives/Options

After consideration of the merits of the proposal, the Board may elect to:

- 1. Adopt by resolution the Permitted Products List for use of herbicides by the Department of Public Works for roadside vegetation management.
- 2. Deny the Permitted Products List proposed by Lane County, Department of Public Works for roadside vegetation management, and direct staff otherwise.
- 3. Delay action on adoption of the Permitted Products List for roadside management, pending additional information from staff, or input from the public.

D. Recommendation

Option 1. Adopt by resolution the Permitted Products List for use of herbicides by the Department of Public Works for roadside vegetation management.

E. Timing

Adopting the Permitted Products List during the spring of 2006 will aid in the effectiveness of our vegetation management activities, reduce the spread of noxious weeds, and allow expansion of our staff training program, begin cost analysis, and noxious weed and vegetation control efforts.

IV. IMPLEMENTATION/FOLLOW-UP

Once approved, the Permitted Products List, "Rights-of-Way" Management Prescription Plan, and other features of Roadside Vegetation Management and Last Resort Policy will be implemented, monitored and tracked by the Vegetation Management Coordinator.

V. ATTACHMENTS

Attachment #1: Comments and correspondence received as a result of public outreach effort.

Attachment #2: "Right-of-Way" Management Prescription Plan & Action Thresholds 2006.

IN THE BOARD OF COMMISSIONERS OF LANE COUNTY STATE OF OREGON SITTING AS THE BOARD OF HEALTH

•	.,	. 0112001	ON THE BOARD OF HEALTH
RESOLUTION NO.	AND () ORDER)))))))))))))	IN THE MATTER OF ADOPTING, BY RESOLUTION A PERMITTED PRODUCTS LIST FOR USE OF HERBICIDES BY THE DEPARTMENT OF PUBLIC WORKS FOR ROADSIDE VEGETATION MANAGEMENT, IN ACCORDANCE WITH THE LAST RESORT POLICY, ORDINANCE 12-03, LANE CODE 15.510 SEC 3(A).
WHERE Resolution a Per for roadside veg	mitted Pr	oducts List t	10, Sec 3(a) requires that the Board of Health adopt by or the use of herbicides by the Department of Public Works and
February 14"', 2	2006 and	subsequen ^a	ermitted Products List was presented to the Vegetation January 11 th , 2006, and the Health Advisory Committee on by discussed by the VMAC on March 8th, 2006 and the Jub-committee on March 28, 2006: and
WHERE Lane County we e-mail contacts v	bsite http	://www.lane	mitted Products List has been made available through the ounty.org/RoadMaint/PermtdProd.htm and by phone, and ed parties; and
summaries of the	e five pro	ducts propos	e proposed for the Permitted Products List, and includes ed with regard to each of the criteria detailed in Lane Code thru (e) attached herein; and
and Action Thres	sholds 20	06, provides	t entitled "Rights-of-Way" Management Prescription Plan a sequential list of treatment options for distinct vegetation well as for specific noxious weed species; and
Way" Managem herbicide use, be	ent Pres ut still all	cription Pla ow use of h	rangement of treatment options in the proposed "Right-of- and Action Thresholds 2006 will significantly restrict erbicides on the Proposed Permitted Products List under ORE BE IT HEREBY
RESOLV accordance with	/ED & Of n the Las	RDERED, that Resort Po	at the attached Permitted Products List is approved, in icy, Ordinance 12-03, and Lane Code 15.510 Sec 3(A).
DATED this		day of	2006.

Bill Dwyer, Chair Lane County Board of Commissioners sitting as the Board of Health

1/2-06 mall

APPROVED AS THE FOLLY

Lane County, Department of Public Works. Product Considerations for Permitted Products List, Per 15.510 sec (4) a-e / Incorp. sec. (5) a-e							
		Сену йл	Magazin (S)				
Product Name	AQUAMASTER	Active In	gredients		GLYPHOSATI	E 53.8%	
Known Inerts	Water 46.2%			dditives	Can be m	ixed or combined	
4(a)i : Substances classified		ole carcinogen	by the US EP			ation: E "Evidence of genicity for humans	
4(a)ii : Substances classified	as a known, likely, or prob	able carcinoge	n by IARC			ably Not Carcinogenic Humans"	
4(a)iii : Substances listed by program as know, likely, or p			National Toxic	cology	probable hi	65: known, likely or uman carcinogens.	
4(b) : Product contains no re	productive toxicants (CA Pr	op 65 list).				5 listed reproductive exicants.	
4(c): Product contains no ing disruptors.	gredients listed by Ilinois EP	'A as known oi	probable end	ocrine		ingredients listed as docrine Disruptors.	
4(d) : Product is not acutely t (Toxicity Class I or II).	oxic to humans: product is r	not labeled as	DANGER or P	OISON	_	s IV: EPA signal word Caution"	
4(e): Product contains no ne and/or listed as nuerotoxic by			re cholinester	ase inhibitors		ous system toxicants sterase inhibitors	
	(1) 有限的可能的数据	ni isi linka	alkou edidi	of salidity of	WAREN EN		
5(a) : Active ingredient has se	oil half-life of 30 days or les	s (exception f	or minerals)		Soil Half-lif	e: Approx. 40 days	
5(b) : Active ingredient has e	xtremely low or very low mo	bility in soils			Ext	remely low	
5(c): Product is not found in RED's, IRED's, and TRED's ; semi-aquatic plants, or wildlif	to exceed a level of conce	ims Registration rn for fish, Aqu	on Eligibility De latic insects, a	ecisions (quatic and		found in EPA decision IRED's or TRED's	
5(d) : Active ingredients have	not been detected in salmo	on waters at a	level harmful t	o aquatic life		soluble in water, low mulation factor	
5(e): Product is not labeled a	as toxic to fish, birds, bees,	wildlife, or don	nestic animals		EPA Classifica	tion: "Practically Non- Toxic	
Aquamaster is a post-emerge perennial weeds, woody brus favorable rating granted. The when used according to label	th and trees. EPA acute To ere are no restrictions on th	xicity rating of	"E" or "Eviden	ice of Non-car	cinogenicity for H	lumans" the most	
						7/101/12/2018	
Weed / Non-Preferred verspecies, persistent vegetation	n, non-herbicide resistant s	pecies.	/\	13			
Public Safety: Road visibil road condition, road shoulder			/\			0	
Woody Plant Material: Formechanical resiliance.	oliar, cut stump, encroachme	ent, hazard,	/		G	190	
4. Road Structure: Drainage	, road stability, erosion, inte	egrity.	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	(1)	С	0	
5. CIP : maintanence, pre-emo	ergent, restoration.		/\	Planned Use	e Area Colored /	O Shaded	
zzvater/zml?fáletkitejálatesítesítesteljt.	กระเดิมส์โกซิสหรองกฎารสะมัญกั	inc illini zinji		SIGARÓWIEM	s Faints (e) stoint	narcas estados	

Annual, Perennial Species	Annual, Perennial Species	Woody Brus	n and Trees		
Bluegrass, Annual	Beachgrass, European	Alder			
Buttercup	Bentgrass	As	h		
Crabgrass	Bermudagrass	Biro	ch		
Falsedandelion	Bindweed, Field	Blackt	perry		
Knotweed	Bluegrass, Kentucky	Broom; French, S	Scotch, Spanish		
Morningglory	Brackenfern	Eldert	perry		
Mustard (Complex)	Canarygrass, Reed	Elt	n		
Puncturevine	Fescue, Tall	Gor	se		
Purslane, common	Knapweed	Hawthorn			
Ragweed, common	Loosestrife, purple	Locust, Black			
Russian Thistle	Poison Hemlock	Poison Oak			
Ryegrass	Ryegrass, Perennial	Rose, Multiflora			
Sowthistle, Annual	Thistle, Canada	Salmonberry			
Speedwell, Purslane	Velvetgrass	Thimble	eberry		
Spurge, Annual	Wheatgrass, Western	Vine N	laple		
Starthistle, Yellow		Wille	DW .		
		Professional Commence			
Mar	nufacturer Information & Contac	t Information			
Manufacturer	Monsanto	EPA Reg. No.	524-343		
Product Information Contact	1-800-332-3111	Emergency Contact	1-314-694-400		
N/A		N/A			
		N/A			
N/A		NI/	Δ		

Product Consider	Lane Count					(5)
Product Conside	rations for Permitted	Products	List, Per 1:).510 Sec (4) a-e / incor	p. sec. (5) a-e
Product Name	HABITAT	Active In	gredients	loope	anulamina Calt a	f Improve 20.7%
Known Inerts	Total Inerts 71.3			dditives	' 	f Imazapyr 28.7% mixed or combined
THOWIT METCS	Total merts 71.3	76	Other A		Can be i	nixed or combined
4(a)i : Substances classified	as known , likely , or probab	ole carcinogen				ation: "Not Likely to be genic to Humans"
4(a)ii : Substances classified	as a known, likely, or prob	able carcinoge	en by IARC			oably Not Carcinogenic o Humans"
4(a)iii : Substances listed by program as know, likely, or p			National Toxic	ology		o 65: known, likely or numan carcinogens.
4(b) : Product contains no rep	productive toxicants (CA Pro	op 65 list).			•	65 listed reproductive toxicants.
4(c) : Product contains no ing disruptors.	redients listed by Ilinois EP	A as known o	r probable end	ocrine		ingredients listed as ndocrine Disruptors.
4(d): Product is not acutely to (Toxicity Class I or II).	oxic to humans: product is r	not labeled as	DANGER or P	OISON		s IV: EPA Signal word "Caution"
4(e): Product contains no ne and/or listed as nuerotoxic by			are cholinestera	ase inhibitors	4	vous system toxicants esterase inhibitors
	"是一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个	$h(p) \leq (2d_p)_p$	Emile Meta	nderkytty ei		
5(a) : Active ingredient has so	oil half-life of 30 days or les	s (exception t	for minerals)		Soil Half-Life	: 60-120 days. Average 90 days
5(b) : Active ingredient has e	dremely low or very low mo	bility in soils				mobility, Microbial edation in soils
5(c): Product is not found in RED's, IRED's, and TRED's) semi-aquatic plants, or wildlife	to exceed a level of conce					found in EPA decision , IRED's or TRED's
5(d) : Active ingredients have	not been detected in salmo	on waters at a	level harmful t	o aquatic life		beled herbicide. No formation detected.
5(e) : Product is not labeled a					EPA Classific	ation: "Practically Non- Toxic
Habitat herbicide will control of some residual control of unde vegetation. Habitat may be a Volume herbicide"	sirable species that germin	ate above the	waterline. Ha	bitat herbicide	e also controls flo	pating and emergent
				347660		Marine Williams
Weed / Non-Preferred veg species, persistent vegetation	-					0
2. Public Safety : Road visibil road condition, road shoulder		oublic health,				0
Woody Plant Material: Formechanical resiliance.	liar, cut stump, encroachme	ent, hazard,				
4. Road Structure: Drainage	, road stability, erosion, inte	egrity.		(E)	С	0
5. CIP: maintanence, pre-em	ergent, restoration.		\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\			0
Zonici Deselubliche Zonic Astronomia notolesi	pie obdileb a Zanene komena.	(e)ê siljivî e 770)	e Calerade de la como	fere income income and a second	e area is shaded is 250e(0) (iii	

Annual, Perennial Species	Grass, Sedge, Rush Species	Woody Brush and Trees			
Poison Hemlock	Reed Canary Grass	Wille	OW .		
Purple Loosestrife	Crabgrass	As	h		
Burdock	Annual Bluegrass	Bigleaf	Maple		
Bindweeds	Brome spp.	Black L			
Common Chickweed	Fescue	Che	rry		
Fleabane	Foxtail	Dogw	rood		
Miners lettuce	Kentucky Bluegrass	Hawti	norn		
Oxeye daisy	Orchardgrass	Honeyl	ocust		
Puncturevine	Morningglory	Oak			
Russian Thistle		Poplar			
Bull Thistle		Red Alder			
Knotweeds		Poison Oak / IVY			
Spurge, annual		Multiflora	a Rose		
Yellow /starthisIte					
Milkweed					
Nightshade					
The state of the s	The last state of the second second second				
Ma	nufacturer Information & Contac	t Information			
Manufacturer	BASF Corporation	EPA Reg. No.	241-426		
Product Information Contact	www.vmanswers.com	Emergency Contact	1-800-832-HEL		
N/A		N/A	A		
N/A		N/A			
N/A		N/A			

Droduct Constd	Lane Coun					
Product Consid	erations for Permitted				4) a-e / Incorp	. sec. (5) a-e
						Han and Sala villand was Educated a constant seed
Product Name	GARLON 3A	4	gredients		TRICLOPYR	14.4%
Known Inerts	Ethanol, Triethylamine, E			dditives		xed or combined
4(a)i : Substances classified	as known , likely , or probal					lon: "Not Likely to be nic to Humans"
4(a)ii : Substances classified	d as a known, likely, or prob	able carcinoge	en by IARC	_		"Probably Not nic to Humans".
4(a)iii : Substances listed by program as know, likely, or p	the state of California (Proporobable human carcinogens	65 list) or the	National Toxic	cology	•	55: known, likely or man carcinogens.
4(b) : Product contains no re	eproductive toxicants (CA Pr	op 65 list).			•	i listed reproductive xicants.
4(c) : Product contains no in disruptors.	gredients listed by Ilinois EF	'A as known oi	r probable end	ocrine		ngredients listed as ocrine Disruptors.
4(d): Product is not acutely (Toxicity Class I or II).	toxic to humans: product is a	not labeled as	DANGER or P	OISON	-	IV: EPA signal word aution"
4(e) : Product contains no ne and/or listed as nuerotoxic b	ervous system toxicants (ing y the Toxics Release Invent	redients that a	re cholinester	ase inhibitors		ous system toxicants terase inhibitors
	Single of the state of the stat		(17/3) - (176)		artige.	
5(a) : Active ingredient has s	soil half-life of 30 days or les	s (exception f	or minerals)			0-120 days, Average 5 days.
5(b) : Active ingredient has e	extremely low or very low mo	bility in soils			Moder	ate mobility
5(c) : Product is not found in RED's, IRED's, and TRED's semi-aquatic plants, or wildli) to exceed a level of conce	rms Registration rn for fish, Aqu	on Eligibility De latic insects, a	ecisions (quatic and		ound in EPA decision RED's or TRED's
5(d) : Active ingredients have	e not been detected in salmo	on waters at a	level harmful t	o aquatic life		vater: miscible. No rmation detected
5(e): Product is not labeled		wildlife, or don	BISONESSISTISMENTAL PROPERTY.			ghtly toxic to aqautic on acute basis
Garlon 3A herbicide is recon an acre depending on plant management objectives.	nmended for the control of w	oody plants, b	roadleaf weed	s and vines.	Use rates vary from	n 2 qt. an acre to 8 qt. e conditions and
ali (Girialdo	MUSES ANTERIOR GESSE		/3///2 1 11: 399	/ <u>/</u> 201163		Z(0))(6
Weed / Non-Preferred ve species, persistent vegetation	•			В		0
Public Safety: Road visib road condition, road shoulde	г.			В		0
Woody Plant Material: Formechanical resiliance.	oliar, cut stump, encroachme	ent, hazard,				
4. Road Structure: Drainage	e, road stability, erosion, inte	egrity.		В	С	0
5. CIP: maintanence, pre-em	ergent, restoration.			B		0
Zone Descriptions * Zone A Read edge to forest	goe of digh. Zone B abbaga	nie lich Zan	a (collage) sin	THE PARTY OF THE P	e area is shaded/ le Zone O = Other	

roduct Considerations for Per	mitted Products List, Per 15.510	sec (4) a-e / Incorp. s	ec. (5) a-e		
Annual, Perennial Species	Grass, Sedge, Rush Species	Woody Brus	h and Trees		
Bindweeds		Alder			
Burdock		As	h		
Canada Thistle		Biro	ch		
Chicory		Blacki	berry		
Dandelion		Che	rry		
Plantain		Chinq	uapin		
Purple Loosestrife		Choke (Cherry		
Tansy Ragwort		Cotton	wood		
Vetch		Hawt	horn		
		Dougla	as Fir		
		Elderberry			
		Loc	ust		
		Kuo	lzu		
		Мар			
		Poisor			
4-4-3-3-4-3-3-4-3-4-3-3-3-3-3-3-3-3-3-3		Scotch			
	and the property of the second second				
Ma	nufacturer Information & Contac	t Information			
Manufacturer	DOW Agrosciences	EPA Reg. No.	62719-37		
Product Information Contact	1-800-258-1470	Emergency Contact	1-800-992-5994		
000060-00-4		Ethyenediamine (Te	traacetic acid) 2.3%		
000064-17-5		Etha			
000121-44-8		Triethylamine 3%			

Lane County, Department of Public Works. Product Considerations for Permitted Products List, Per 15.510 sec (4) a-e / Incorp. sec. (5) a-e								
Product Conside	rations for Permitte		List, Per 15	.510 Sec (4) a -e / inco	rp. sec. (5) a-e		
Product Name	MILESTONE		ngredients		AMINOPYRA	LID 40 6%		
Known Inerts	Total Inerts 59		Other A	dditives	-	mixed or combined		
	elen en general de la	1.00						
4(a)i : Substances classified a	s known , likely , or prob	able carcinoger	n by the US EPA	\	Carcino	cation: "Not Likely to be genic to Humans"		
4(a)ii : Substances classified	as a known, likely, or pro	bable carcinog	en by IARC			bably Not Carcinogenic o Humans"		
4(a)iii : Substances listed by t program as know, likely, or pr			National Toxico	ology		p 65: known, likely or human carcinogens.		
4(b) : Product contains no rep	roductive toxicants (CA F	Prop 65 list).			No Cal Prop	65 listed reproductive toxicants.		
4(c): Product contains no ing disruptors.	redients listed by Ilinois E	EPA as known o	or probable endo	ocrine		o ingredients listed as indocrine Disruptors.		
4(d) : Product is not acutely to (Toxicity Class I or II).	xic to humans: product is	s not labeled as	DANGER or Po	DISON	Toxicity Cla	ss IV: EPA signal word "Caution"		
4(e) : Product contains no ner and/or listed as nuerotoxic by			are cholinestera	se inhibitors		rvous system toxicants nesterase inhibitors		
	September 160		on the state of the state of	Afrikalikasi ku				
5(a) : Active ingredient has so	il half-life of 30 days or le	ess (exception	for minerals)		Soil Half-Li	fe: Approx 34.5 Days.		
5(b) : Active ingredient has ex	tremely low or very low n	nobility in soils			Some pote	ential (Koc 10.8 L/Kg)		
5(c): Product is not found in U RED's, IRED's, and TRED's) semi-aquatic plants, or wildlife	to exceed a level of cond	rams Registrati ern for fish, Aq	on Eligibility Dec uatic insects, aq	cisions (juatic and	Product is not found in EPA decision for RED's, IRED's or TRED's			
5(d) : Active ingredients have	not been detected in salr	non waters at a	ı level harmful to	aquatic life	No info	ermation detected		
5(e) : Product is not labeled a	s toxic to fish, birds, bees	s, wildlife, or do	mestic animals.	-	EPA Classific	cation: "Practically non- toxic		
Milestone herbicide is a new li species and other problem we from 4 to 7 fluid ounces per ac	eds. Milestone contains	2 pounds of ac	tive ingredient p	er gallon. La	beled weeds ca	an be controlled at rates		
ક્ષામાં કરાયા છે. 					5,07401,685) 3			
Weed / Non-Preferred veg species, persistent vegetation	non-herbicide resistant	species.			9 3			
Public Safety: Road visibili road condition, road shoulder.	<u> </u>				90	0		
Woody Plant Material: Fol mechanical resiliance.	ıar, cut stump, encroachı	ment, hazard,	A	В	C	0		
4. Road Structure: Drainage,	road stability, erosion, in	tegrity.				0		
5. CIP : maintanence, pre-eme	rgent, restoration.			planned use	area is shade	O d/ colored		
k Zelna A. P. Rega a radore a 6. jingesika	jerojolistigaani (sadojo)	injetacijteli, rešij	(* (**):2:6)2: 6)4:	(6) 17/03/17/07	e.72076(e)/201	igi aligas		

Product Considerations for Per	mitted Products List, Per 15.510				
		violitia harristici ici			
Annual, Perennial Species	Grass, Sedge, Rush Species	Woody Brusi	n and Trees		
Common, Burdock					
Chicory					
Daisy, Oxeye					
Dock, Curly					
Fireweed		- "			
Hawkweed, Orange					
Knapweed, Diffuse					
Knapweed, Russian					
Knapweed, Spotted					
Knapweed, Meadow					
Ragwort, Tansy					
Starthistle, Yellow					
Thistle, Bull			.,.		
Thistle, Canada					
Thistle, Musk					
Bindweed, Nightshade					
	Angle Sharing arty . The differences in				
Ma	nufacturer Information & Contac	ct Information			
Manufacturer	Dow Agrosciences	EPA Reg. No.	62719-519		
Product Information Contact	www.dowagro.com	Emergency Contact	1-800-992-5994		
N/A		N/A			
N/A		N//	Α		
N/A		N/	Ā		

Lane County, Department of Public Works.										
Product Considerations for Permitted Products List, Per 15.510 sec (4) a-e / incorp. sec. (5) a-e										
			Sulfometu	ron Methyl 56 25%	/ Metsulfuron Methyl					
Product Name	OUST EXTRA	Active Ingredients	Guilometa	15%	7 Metsundron Metrly					
Known Inerts	Total Inerts 28.75%	Other Ad	ditives	Can be m	ixed or combined					
Z MY FOLKS		prophalis (pagelians)								
4(a)i : Substances classi	ified as known , likely , or proba	ble carcinogen by the US EP	'A		tion: "Not Likely to be enic to Humans"					
			_	Class 4: "Proba	ably Not Carcinogenic					
· · · · · · · · · · · · · · · · · · ·	sified as a known, likely, or prob			_	Humans" 65: known, likely or					
•	d by the state of California (Proportion or probable human carcinogen	•	cology		ıman carcinogens.					
4(b) : Product contains n	no reproductive toxicants (CA P	rop 65 list).		_	5 listed reproductive exicants.					
		<u> </u>		Contains no l	ngredients listed as					
4(c): Product contains n disruptors.	o ingredients listed by Ilinois Ef	PA as known or probable end	locrine		docrine Disruptors.					
4(d) : Product is not acut (Toxicity Class I or II).	tely toxic to humans: product is	not labeled as DANGER or F	POISON		IV: EPA Signal word Caution"					
	no nervous system toxicants (inc cic by the Toxics Release Inven		ase inhibitors		ous system toxicants sterase inhibitors					
5(a) : Active ingredient h	as soil half-life of 30 days or les	ss (exception for minerals)		Soil Half-Life	e: Approx 45 Days.					
5(b) : Active ingredient h	as extremely low or very low m	obility in soils		Mode	rate mobility					
RED's, IRED's, and TRE	nd in US EPA of pesticide progra D's) to exceed a level of conce			Product is not found in EPA decision for RED's, IRED's or TRED's						
semi-aquatic plants, or w	vildlife.				·					
5(d): Active ingredients	have not been detected in salm	on waters at a level harmful	to aquatic life	Dispersable in Water. No found information on Salmon waters						
5(e) : Product is not labe	eled as toxic to fish, birds, bees,	wildlife, or domestic animals			tion: "Practically Non- juatic species". Toxic					
	· · · · · · · · · · · · · · · · · · ·				atic species.					
		Korintalares(Alitori	iellone z							
Oust Extra Herbicide cor	ntrols many annual and perenni ds are controlled by both pre-er	al grasses and broadleaf wee	eds, It may als	so be used to contr	rol hardwoods and					
weeds on un-improved to	urf and roadsides, where turf is	well established as a ground	cover. Applic	cations may tempo	prarily suppress grass					
growth and inhibit seed I			nekk rigge sammen en er er er er							
713,6514,615 	d Use of Elej bji ides	7/Abiate	740ne I	Zaine	Zone					
	d vegetation: Noxious weeds, tation, non-herbicide resistants		В	С	0					
2. Public Safety: Road vinealth, road condition, ro	visibility, guardrails, road signs, oad shoulder.	public	В	С	0					
3. Woody Plant Materia hazard, mechanical resil		0								
	nage, road stability, erosion, int	earity	B B	C	. 0					
		∨yırıy.	В		0					
5. CIP: maintanence, pre Zone Descriptions		p	Q	rea is shaded/ co	•					
			Zone Descriptions.							

	graffa fra 20. spillion				
nnual, Perennial Species	Annual, Perennial Species	Woody Brusi			
Annual Bluegrass	Hairy Vetch	Blackberry			
Chicory	Hop Clover	Gor	se		
Clover	Houndstongue	Honeys	uckle		
Common Chickweed	Oxeye daisy	Multiflora	Rose		
Common Groundsel	Poison Hemlock	Snowt	perry		
Common Purslane	Prostrate knotweed	As	h		
Common Ragweed	Reed Canarygrass	Che	rry		
Common Speedwell	Tansy Ragwort	Dogw	ood		
Common Tansy	Teasel	Elm	ns		
Common Vetch	Thistle	Hawthorn			
Common Yarrow	Wild Mustard	Persimmon			
Crabgrass		Red Maple			
Dandelion			Vaccinium		
Fescue					
Fireweed					
Field Pennycress					
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Ma	nufacturer Information & Contac	et Information			
Manufacturer	DuPont	EPA Reg. No.	352-622		
roduct Information Contact	1-800-44-7515	Emergency Contact	1-800-441-36		
74000.04.0					
74223-64-6		Metsulfuron N	Methyl 15%		
N/A		N/A			

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Attachment #1: Comments and correspondence as a result of public outreach effort.

1. Dave Cramsey, Interested Public;

Just so you know, I do support the proper use of herbicides. My experience is that herbicides when properly used do not pose risks to the public or environment. All of the quality, peer-reviewed research that I have seen supports this. I would be interested to talk with you regarding the on the ground application of the Last Resort Policy. At what point can the County actually propose the use of herbicides for a noxious weed? for example, Scotch Broom or knotweed.

2. Tom LoCascio, Interested Public;

Hello Orin.

I have been meaning to ask if the language written in the Counties proposed Last Resort herbicide policy addresses the concept of using herbicides as a first resort when a new pioneer known highly invasive species is found in a small population growing along a county roadside.

I'm sure you'll agree that many invasive species get introduced or a toe-hold along our transportation corridors or other publicly owned open spaces. Quick removal of these aggressive reproducers (known not to respond to other control methods) by utilizing herbicides could prevent them from escaping elsewhere into our landscape. The cost saving to the environment and the roadside budget would far exceed the relatively small amount of herbicide that would be used to eradicate these founder populations.

3. Hazel Dowling, Interested Public:

She has asked us to move her East end NSA sign to make her NSA smaller, in the hopes that if she cuts down all the blackberries on her side of the fence that we could cut and spray them on our side. I explained where we're at with the spraying right now; she wants us to go ahead an move her sign in the hopes that these types of requests, from citizens willing to control problems on their side of the fence, will merit our help and cooperation on the R/W in the future.

4. Ross Penhallegon, VMAC member, OSU Extension Service;

Orin – I have thoroughly review the materials that have been developed for Right of Way Management, a list of suggested herbicides, and accompanying MSDS sheets.

I am very impressed with the amount of time and effort that has gone into this project and reports.

The materials are very thorough.

The accompanying information, MSDA sheets also provided needed information to review and evaluation.

The MSDS sheets showed that these materials are as safe as can be found, have lower amount of potential harmful materials for both human and non humans. There maybe better products but the current list is very appropriate.

The Right of Way, Management Prescription Plan and Thresholds – very thorough. It might be good to enclose that "in the future as new biological controls are developed, that they be reviewed and implemented as time, money and energy allow."

I appreciate the alternative A and B methodology, after one method is involved than a second method can be implemented. Especially with the Oregon Dept of Ag- Noxious Weed list A, these need to be kept under as best control as possible. In cases such as knapweed or knotweed, this may not be feasible, but as new weeds emerge, they can be controlled BEFORE they become major issues.

RoW M P Plan – point to consider. A1zone usually needs to be vegetation clean or very low, slow growing materials. My preference is no vegetation.

Zone a2, probably needs to have a low growing, low maintenance vegetation such as like annual blue grass, Companion grass or Elka rye. Since zone a1 is usually gravel, but by zone a2, this is finer materials and can erode. Issues—if there is no vegetation then erosion to the road bed is possible; with low vegetation, no or little erosion but the need for more intense care. Catch 22.

Appendix C is an excellent tool, the ODA noxious weed list and the importance of removal or control. Of course such a list is very fluid depending on the site, yearly weather, introduction off new species, and control methods.

Bull thistle – usually can be controlled very easily with mechanical control.

Excellent work.

Ross



PUBLIC WORKS

"Rights-of-Way" Management Prescription Plan & Associated Action Thresholds

1. Purpose.

The purpose of management prescriptions and action thresholds is to provide guidelines for County personnel who are involved in vegetation management activities. Development of our management prescriptions and action thresholds provides a framework of management techniques to best confront vegetation issues, and provide an integrated approach in the methods we employ for vegetation management within Lane County "Rights-of-Way."

2. Summary of Plan.

Our Management Prescription Plan is based on the development of action thresholds and management prescriptions that focus on site-specific vegetation issues. Successful implementation is dependent upon allocation of sufficient funding and resources to accomplish vegetation management activities. This plan facilitates the methodology of preferred alternatives to meet the desired outcomes of the Last Resort Policy guidelines. The management techniques utilized may include manual, mechanical, cultural, and chemical approaches to manage distinct vegetation issues. The process of preferred alternatives will direct the short-term and long-term strategies in vegetation management activities. These strategies will guide a step-by-step process to manage, monitor, and modify techniques based upon the success or failure of an approach. Associated costs and environmental impacts of a technique, along with alternative methods, will be considered when maintaining road structure integrity, public safety, and environmental stewardship to high quality standards.

3. Goals.

The goal of integrated vegetation management is to establish low maintenance vegetation conditions that promote public safety, reduce maintenance costs, sustain road system integrity, and promote environmental stewardship. Through planning, monitoring, and review of our management activities we can use resources in a cost-effective manner that is both effective to the management need, and the need to protect human and environmental health.

4. Objectives.

- Safety for the traveling public and county staff.
- Maintenance of the infrastructure and road system integrity.
- Cost-effective use of public resources.
- Reduce or eliminate long-term environmental impacts.
- Satisfy the needs and concerns of adjacent landowners and the traveling public.

5. Action Thresholds.

Action thresholds are a specific description of conflicts of vegetation and "Right-of-Way" management standards that, if exceeded, trigger a need to intervene. Vegetation in whole, or part, may not be managed unless it exceeds a County-defined tolerance level. A list of current management standards exists in the Lane County Integrated Management (IVM) Program Standards and Guidelines Document, and proposed action thresholds are listed in the Management Prescription Plan incorporated as part of this document.

6. Economic Considerations.

Economic considerations factor into choice of treatment. Cost effectiveness may be used as a measure of the success or failure for vegetation management activities in terms of economics and related environmental considerations. Direct costs include equipment expense, labor hours, and materials, while indirect costs incorporate the loss of service quality by lowering standards, environmental degradation, water quality concerns, human health, and aesthetics. Indirect costs will be measured qualitatively, while direct costs will be quantitatively measured.

7. Timing.

Timing is an important factor for all vegetation control and maintenance methods. The timing of vegetation management activities will consider plant life cycles, environmental conditions, seasonality, and weather, as these variables can affect the desired outcome of a proposed management activity.

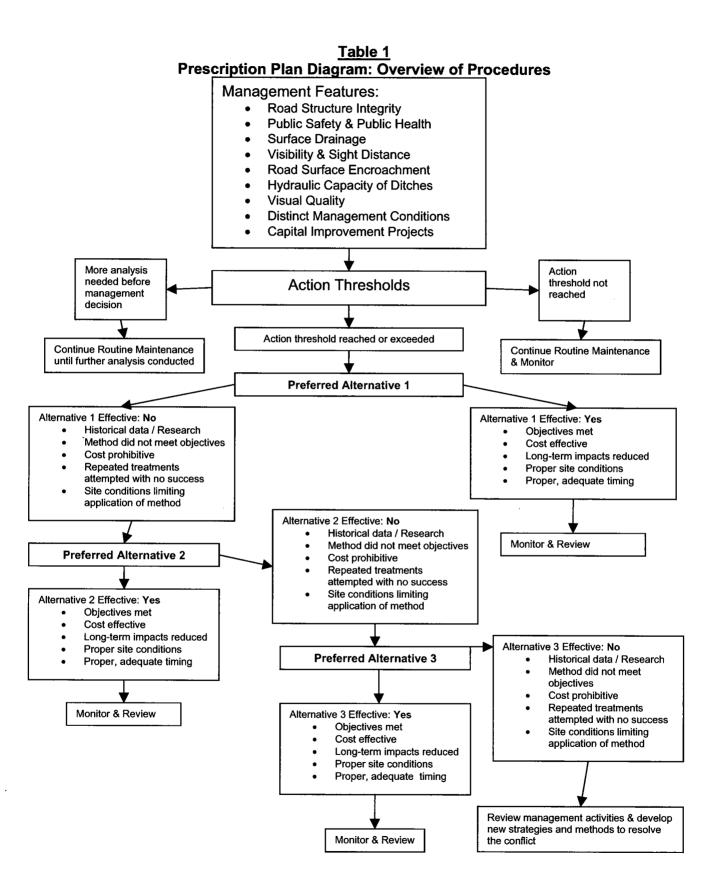
8. Site Specific Treatment Plans.

Prescriptions may not be made for whole "Rights-of-Way," but instead developed for specific sections of any one "Right-of-Way" and the associated constraints. It is important to base treatment choices on inventory and analysis of existing site characteristics and vegetation conditions. Management prescriptions for different areas of vegetation management may include:

- Desired outcome of the Right-of-Way area to be treated.
- Site specific habitat conditions, including: water features, adjacent property issues, plant populations, plant species present, exposure, microclimate, and sensitive habitat areas.
- Short-term and long-term environmental impacts.
- Persistence of vegetation issue.
- Desired level of road maintenance and road classification.
- Administrative and economic factors.

9. Management Prescription Plan.

This is a step-by-step approach that incorporates both Lane County's Last Resort Policy and the Integrated Vegetation Management Policy. The Prescription Plan is an integrated approach to manage site-specific vegetation issues while maintaining County infrastructure. The Management Prescription Plan, detailed in Table 1, guides the vegetation management process from start to eventual completion, from planning through monitoring, and technique review.



10. Method of Preferred Alternatives.

The concept of preferred alternatives is a step-by-step process that dictates which management tool(s) will be utilized, and in what order, regarding Integrated Vegetation Management activities. The first alternative will be employed as the initial approach unless it has either been shown to be ineffective through external research and documentation, on the ground efforts, or is found to be cost prohibitive. If the first alternative is shown to not meet desired objectives, then the second alternative is to be utilized. If that, too, is shown to be ineffective, the third and final alternative is employed. If all current alternatives do not meet management objectives, new approaches and ideas will be approached to find a viable solution to the management concern. The criteria for an alternative to be successful include the alternative's ability to fulfill management objectives, comparable costs to other approaches, reduced impacts on the environment and public health, and overall reduction in future maintenance activities.

Through the techniques of Integrated Vegetation Management, one Alternative standing alone may not resolve a management issue, and it may require portions of other listed alternatives be used in order to successfully reach a desired objective. Integrating alternatives provides broader and more adaptive management techniques to be employed in resolving vegetation management concerns. Examples of this process are listed below.

Example 1: Woody vegetation obstructing sight distance.

Preferred Alternative 1: Mechanically or manually remove woody vegetation to restore a safe sight distance. Stump grind to prevent further re-growth and repeated maintenance.

Preferred Alternative 1: Incorporating portion of Preferred Alternative 2. Mechanically or manually remove woody vegetation to restore a safe sight distance. Stump grinder cannot access stump; stump paint with herbicide to prevent further re-growth and repeated maintenance.

<u>Example 2: Excessive sod and/or vegetation build-up that interferes with routine shoulder maintenance.</u>

Preferred Alternative 1: Scalp road edge or shoulder to remove excess sod and/or vegetation

Preferred Alternative 1: Incorporating portion of Preferred Alternative 2. Scalp road edge or shoulder to remove excess sod and/or vegetation. After scalping re-seed disturbed area with preferred species and/or mulch area to prevent unwanted vegetation establishment.

11. Monitor and Review.

Lane County Department of Public Works, on a continuing basis, will monitor and review new technologies and methods involved in vegetation management activities. The review process may adapt the tools and techniques Lane County employs to confront vegetation management concerns including cultural, mechanical, manual, technical, and chemical approaches.

12. Management Features & Associated Action Thresholds.

I. Road Structure Integrity.

a. Description

Road structure integrity refers to the protection and preservation of base materials, shoulder design, and road surface structure.

b. Action Thresholds: (Situation exists or has high potential to develop)

- i. Cracks or heaving within road surface or base material, created by rooting or vegetative growth.
- ii. Erosion of road shoulder.
- iii. Excessive stoloniferous or other root development within road shoulder or road surface.
- iv. Alteration of road shoulder design for lateral drainage or structural integrity.
- v. Excessive sod and/or vegetation build-up that interferes with routine shoulder maintenance.

II. Public Safety / Health.

a. Description

Public safety refers to managing vegetation to the highest level for safety of the traveling public. Public health refers to managing vegetation that has inherent human health risks related to toxicity, chemical levels, and irritants associated with plant materials.

b. Action Thresholds: (Situation exists or has high potential to develop)

- i. Vegetation exists that is known to pose human toxicity or irritant risks.
- ii. Vegetation obstructs traffic signals or control devices producing public safety risk.
- iii. Roadside vegetation has reached heights or densities that produce fire risk.

III. Surface Drainage.

a. Description

Surface drainage refers to un-obstructed drainage of surface water from the road surface to adjacent drainage features.

b. Action Thresholds: (Situation exists or has high potential to develop)

- i. Repeated pooling or water stagnation on road surface after rain events, creating safety concerns.
- ii. Ice formation occurring from improper surface drainage.
- iii. Direct or potential decline in road surface materials from improper surface drainage.

IV. Visibility & Sight Distance.

a. Description

Visibility and sight distance refer to promoting roadside vegetation conditions that increase visibility of road features and associated safety fixtures for the traveling public.

- b. Action Thresholds: (Situation exists or has high potential to develop)
 - i. Vegetation reduces proper sight distance for driver and public safety.
 - ii. Intersections and inside corners are obscured by vegetation.
 - iii. Vegetation has grown to a height or density that obscures a safe sight distance.
 - iv. Vision clearance triangle is obscured by vegetation.

V. Road Surface Encroachment

a. Description

Road surface encroachment refers to any vegetation that extends onto, or roots, within the road surface producing either a public safety risk and/or infrastructure risk.

- b. Action Thresholds: (Situation exists or has high potential to develop)
 - i. Vegetation rooted or growing onto road surface.
 - ii. Vegetation extends from road edge into road surface.
 - iii. Weather event or excessive plant growth has caused vegetation to lean or fall onto road surface.
 - iv. Fog line is obstructed or obscured by encroaching vegetation.

VI. Distinct Management Conditions.

a. Description

Distinct management conditions are those areas where typical management activities are regulated, obstructed, or otherwise constrained.

- b. Action Thresholds: (Situation exists or has high potential to develop)
 - i. Vegetation obscures or degrades proper function of guardrails.
 - ii. Vegetation obstructs vision or function of signs, fixtures, or delineator posts.
 - iii. Non-preferred vegetation alters the proper function of waterways, special habitat areas, designated open space, and other special management areas.
 - iv. Emergency situations that cannot be predicted or planned for in advance.

VII. Capital Improvement Projects.

a. Description

Capital Improvement Projects are those activities that either replace, or create new site characteristics for a transportation or infrastructure need.

- b. Action Thresholds: (Situation exists or has high potential to develop)
 - i. Vegetation obstructs capital improvement proposed plan.
 - ii. Exposed soil or substrate requires vegetative enhancement.
 - iii. Erosion either exists or has potential to develop if no action is taken.

VIII. Hydraulic Capacity of Ditches.

a. Description

Hydraulic capacity of ditches refers to the movement of water, un-obstructed, through the designed drainage system.

- b. Action Thresholds: (Situation exists or has high potential to develop)
 - i. Vegetation impedes or obstructs proper water flow within the drainage ditch.
 - ii. Culverts become plugged or blocked by vegetation.
 - iii. Vegetation and sediment build-up reduces ditch function and design.
 - iv. Water becomes impounded or trapped by vegetation, reducing integrity of base materials and road surface.

IX. Visual Quality.

a. Description

Visual quality refers to the quality and appearance of roadside vegetation. Healthy, native vegetation encouraged, while diseased, dying, and non-native vegetation discouraged.

- b. Action Thresholds: (Situation exists or has high potential to develop)
 - i. Vegetation areas that are diseased and/or in poor health.
 - ii. Vegetation that has died or been altered, producing large open areas or exposed soil.
 - iii. Non-native vegetation that produces large areas of monoculture growth.
 - iv. Pruning or brushing techniques that reduce visual quality of vegetation.

13. Preferred Alternatives.

The concept of preferred alternatives works to establish a starting point for management followed by alternative approaches based on the success or failure of a management tool. The application of preferred alternatives (see Table 2) is guided by both internal and external documentation and research, along with on-the-ground management observations. Success and/or failure of an alternative is based upon numerous factors including, but not limited to, efficacy, cost of method employed, environmental impacts, and site characteristics.

<u>Table 2</u>
Preferred Alternatives for Distinct Vegetation types, excluding Noxious & Invasive Weeds*

Management Feature		Grasses		ı	Broadleaf			Woody	
Road Structure Integrity	Mechanical Manual	Cultural Technical	Herbicide	Mechanical Manual	Herbicide	Cultural Technical	Mechanical Manual	Herbicide	Cultural Technical
Surface Drainage	Mechanical Manual	Cultural Technical	Herbicide	Mechanical Manual	Cultural Technical	Herbicide	Mechanical Manual	Herbicide	Cultural Technical
				Augustus (1				in and an	
Road Surface Encroachment	Mechanical Manual	Herbicide	Cultural Technical	Mechanical Manual	Cultural Technical	Herbicide	Mechanical Manual	Cultural Technical	Herbicide
	6 (** E. 165) 1 - E. 16 (** E. 165)	gotherni Parajotan	26,000		National Control	(O)(A) all Yelongik all	Addisentation	Thursday (S	
Hydraulic Capacity of Ditches	Mechanical Manual	Cultural Technical	Herbicide	Mechanical Manual	Cultural Technical	Herbicide	Mechanical Manual	Cultural Technical	Herbicide
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Capital Improvement Projects	Mechanical Manual	Herbicide	Cultural Technical	Mechanical Manual	Herbicide	Cultural Technical	Mechanical Manual	Cultural Technical	Herbicide

Alt 1 - Alternative 1

Alt 2 – Alternative 2

Alt 3 – Alternative 3

^{*} Noxious & Invasive weeds maintain separate and distinct control prescriptions (Appendix D)

14. List of Appendices.

Appendix A: Definitions.

Appendix B: Management Zone Profile.

Appendix C: Lane County Noxious and Invasive Weed List.

Appendix D: Noxious and Invasive Weed Control Prescriptions.