

From: melinda_lowe
To: [Rulesinfo: angelarossmann@yahoo.com](mailto:angelarossmann@yahoo.com)
Subject: Support to Ban the Yews
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Melinda Lowe
2313 Lemhi
Boise ID 83705
Lowe.melinda@outlook.com

Brian J. Oakey, Deputy Director
Dept. of Agriculture
P.O. Box 790 Boise, ID 83701-0790

RE: Negotiated Rule Making 02.06.22—Noxious Weed Rules, Docket # 02-0522-17xx

Dear Mr. Oakley,

Being a homeowner with Japanese Yews on my property, I did not take the proposal to add the plants to the noxious weed list lightly. I considered the proposal with all of its intended and unintended consequences before making a decision. With great deliberation, I have decided to remove my mature Japanese yews from my property and support Ms. Rossmann's petition to amend Department Rule 02.06.22 to add Yews (Japanese, Chinese and English) to the list of Noxious Weeds.

These are some of the questions that I considered prior to making my decision:

Why does the yew warrant being banned when there are other species native plant species that are highly toxic to wildlife?

Unlike the Yew, toxic native plants (Poison Hemlock, Elderberry, Dogbane Chokecherry, Milkvetch etc.) do not have edible parts available as a food source during the winter months when wildlife is most likely to browse on anything edible. Furthermore, wildlife have had generations to habituate to poisonous native plants and likely avoid them.

How real is the threat to wildlife?

It is well documented that dozens of animals have died in Idaho due to yew poisoning. The Idaho Statesman reported that over 100 animals died of Yew poisoning during the winter of 2016/2017. The number is likely much higher due to unreported deaths. According to an article Veterinarian Medicine, written by R.B. Cope titled, "Toxicology Brief: The Dangers of Yew Ingestion", The author states, "The amount of plant

material required to obtain a lethal dose is quite small. So a dog could consume a potentially lethal dose while playing with Taxus species branches or sticks.” If the Yew is so toxic that an animal can die without even ingesting the plant, it is time to consider banning it.

Other concerns:

A secondary impact from these poisonings is the potential of other animals (wild and domestic) to consume the poisoned carcasses. It is my understanding the carcass of poisoned animals remain highly toxic. This trickle-down effect could result in the deaths of many scavenger species from small mammals to bear.

The animals that have been poisoned are an important resource to the Idaho Fish and Game Department and to others like me who value wild animals. The State Department of Agriculture should be mindful of other State agencies’ missions and work to support them. Furthermore, Yews clearly meet the definition of “Noxious Weed”, as defined in IDAPA 22-2402. Yews have the “potential to cause injury to public health, crops, livestock, land or other property”.

Bearing in mind all of these issues mentioned above, I fully support banning the Yew by amending Department Rule 02.06.22.

Thank you for your consideration.



Melinda Lowe