

June 22, 2017

Brian J. Oakey, Deputy Director ISDA

Via Email: rulesinfo@ISDA.IDAHO.GOV

Re: WildLands Defense comments regarding Rules Governing Noxious Weeds (IDAPA 02.06.22) related to poisonous exotic yews

Dear Idaho Department of Agriculture,

WildLands Defense is providing the following comments on Docket # 02.06.22, Noxious Weed Rules, regarding exotic poisonous yews. We believe strong action by ISDA is essential to prevent continued deaths of big game animals, and poisoning of people, from ornamental yews. This rule making process is essential to protect wild animals from fatal yew ingestion, particularly in urban and other habitation interfaces with wintering big game. It is also necessary to protect children and pets from poisoning.

We strongly support making the sale of exotic yews illegal in Idaho. The exotic yews should be added to the Statewide Prohibited Noxious Weed List, and should be Controlled, especially removal of plants in habitation interface zones with wildlife habitat.

One comment in the Meeting Minutes noted there are only a couple of out of state suppliers of yews. Thus, compliance with potential Idaho regulations banning import of yews could be easily monitored.

In reviewing the Meeting Minutes, we are also concerned that some nursery businesses are unwilling to stop selling this dangerous plant, and appear to support only ineffective and minimal measures (such as readily removable/short-lived poison stickers on pots or tags on plants) that will NOT protect wildlife or people. For example, unsuspecting home buyers who purchase a home where yews were planted by previous owners will NOT be aware of the toxicity of the plants in their landscaping. Stickers will be long gone – as just one example of how ineffective this would be.

We stress that with inaction, or minimal action, big game poisoning incidents are likely to become more and more common as development continues to encroach on big game winter ranges. Plus winter ranges on public and other lands have often burned, and lacking in native shrub cover, and vulnerable to dominance by cheatgrass and other weeds that provide very poor winter habitat during periods of snow accumulation.

For every big game animal verified to have died of yew poisoning there are likely many more animals that have succumbed, but carcasses were not found and/or no analysis was conducted.

Moreover, climate change is predicted to result in more extreme weather events, and disrupted ecological processes (such as increased weed susceptibility), that further hinder recovery of big game winter ranges – making it more likely big game will seek food wherever they can find it, venturing close to human habitations.

Thank you for the opportunity to comment.

We have included links to some articles on verified big game mortality:

<https://idfg.idaho.gov/press/pronghorn-deaths-blamed-japanese-yew>

“Just two weeks ago, a group of eight elk died in the Boise foothills after feeding on Japanese yew plants. This week, a herd of 50 pronghorn antelope have been found dead in the town of Payette, victims of the same toxic shrub.

The pronghorn were reported to Fish and Game staff early Tuesday afternoon, January 17th; conservation officers located the 50 animals in one large scattered group later that day”.

<http://www.idahostatesman.com/outdoors/article131269209.html>

“Homeowner Jerry Smith and Idaho Fish and Game conservation officer Ben Cadwallader watched a mule deer eat from the poisonous yew bush in Smith’s back yard last Friday. They followed as the deer ran over a hill.

“And it was dead,” Smith said. “They die that fast. It was not 10 minutes and that deer was dead. ... It was a frustrating situation for us because we’ve worked hard at trying to help the animals stay alive for all the years we’ve been there.”

SEP

Sincerely,

Katie Fite

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