

Submitted: March 5, 2019

Dear Members of the Board of Forestry,

Thank you for your service to the citizens of Oregon, and your continued interest in coastal communities dealing with the issue of herbicide spraying in their watersheds' forest lands. On February 28th, representatives of the Spray Free Coast coalition met with State Forester Peter Daugherty and ODF staff members in Newport, including Lena Tucker (Private Forests Division Chief), Joe Touchstone (Business Analyst), and several local foresters. This meeting was in response to the letter we sent to the State Forester (of which you received a copy) requesting improvements to ODF's FERNS spray notifications, which were based on our experiences as users and the experiences of our community members. Our coalition was represented by members of Rockaway Beach Citizens for Watershed Protection, Lincoln County Community Rights, Coast Range Forest Watch (Coos County) and the Kalmiopsis Audubon Society (Curry County).

At this meeting Mr. Touchstone, who developed, manages and works on FERNS, told us that he has a long list of improvements to make to FERNS, and with ODF's annual budget for the system he is able to do about ten of those improvements per year.

We requested five improvements to the FERNS system that are important to our community members:

Changes that would make the system work better for users:

1. Create separate category for aerial chemical application that users can choose when creating subscription
2. Separate county-wide roadside spraying notifications (so users are not barraged with irrelevant notifications)
3. Decrease the size limit for NOAPs (at least limit to counties, or watersheds, so that monitoring sprays is more manageable)

Additions to FERNS that would enable users to better protect themselves/land/water:

4. IDENTIFY SPECIFIC CHEMICALS: Create a place on the NOAP where the operator can update it with the specific of chemicals that were applied (on the day of the spray)
 - a. Necessary for land owners (or municipalities) to be able to test their water for contamination (tests are expensive, so need to know which chemicals to test for), or for people to get proper medical treatment
5. "REAL-TIME" NOTIFICATIONS: Create a button on the NOAP that would send a 48-hour spray window notification to subscribers (especially for aerial sprays)

- a. Necessary to give community members time to prepare or leave the area for protection

We appreciated the State Forester's and ODF staff members' concern in making sure they understood exactly which improvements to FERNS would be most beneficial to our communities. Yet the response from both Mr. Daugherty and Mr. Touchstone was that while the changes we requested were possible, ODF would need a much greater budget to accomplish them. Mr. Daugherty told us that the solution would need to be legislation in support of these improvements, and asked us to contact our legislators. He also said that ODF would develop and send us a work plan and budget for the changes we requested.

We believe that the five improvements we are requesting are practical and straight-forward, and that there is no reason that they cannot be accomplished within ODF's normal annual budget. We are wary of supporting more funding for ODF on this matter, as we are unsure that the priorities for what they choose to work on are serving the citizens in our communities. We explained that improvement numbers 4 and 5 on our list were the most important to us and our communities, and while we understood legislation may be necessary for operators to carry out these additional steps, we are still requesting ODF make these additions to the FERNS website. While it should not be on our shoulders to protect our communities from the effects of aerial spraying, pending legislation these improvements would allow us to better communicate with our neighboring timber managers by providing the mechanisms for them to alert us more specifically about spray events. We believe that it is the duty of ODF to ensure that citizens can be fully informed of forestry operations that could effect their health, and are aware that it is the responsibility of the State Forester to request landowners and operators to provide this information.

Thank you for your concern, and please contact us with any questions.

Sincerely,

Teresa Bird
Co-director of Coast Range Forest Watch, and Assistant Conservation Director of the
Kalmiopsis Audubon Society
on behalf of

The Spray Free Coast Coalition
sprayfreecoast.org

