

Oregon Board of Forestry
Oregon Department of Forestry
2600 State Street Salem, OR 97310

11/07/2018

Beyond Toxics submits these comments to the Board of Forestry pertaining to adopting the State Forest Management Plan (FMP). Beyond Toxics is a statewide environmental justice and environmental protection advocacy organization founded in 2000. We represent dozens of impacted rural communities and thousands of members who would like to see the Board initiate a policy shift away from the State's reliance on aerial herbicide applications as a forest management tool in state forests. We support changes to Forest Management Plan (FMP) to conserve and restore forest ecosystems and incorporate health-based standards to enhance overall protection of water quality, soil integrity and human health.

While there are a number of laudable goals in the FMP, the issue of updating forest chemical practices is largely ignored. We recommend modernizing Oregon's state forest management practices by adopting successful, commonsense and science-based models followed by the USFS and neighboring states with similar forest soils, trees species and climate. Please consider these comments to advance the concepts and attributes in Principle 2 (Providing and restoring properly functioning aquatic systems) and Principle 5 (Watershed Health).

The primary issue that need the Board's attention is protecting water resources. Compared to all other Pacific Northwest states, Oregon has the smallest forestry-specific buffers for aerial herbicide application. In fact, Oregon currently lacks protections for perennial tributaries to fish streams. [See Table 1 Forest Chemical Buffer Comparison]

Other Pacific Northwest states require larger spray buffers overall and mandated buffers for *all streams with flowing water*, not only fish habitat and drinking water streams. Furthermore, nearly forty years ago, the US Forest Service ended the use of helicopters to spray herbicides as a forest management tool in federal forests.

We urge the Board to consider adopting these modest additions to the State Forest Management Plan:

1. Phase out aerial herbicide sprays in state forests and set a goal of 2020 to end aerial spraying;
2. Increase pesticide buffers on all drinking water sources (springs, streams and lakes) to 300 ft.;
3. Establish pesticide buffers on perennial, non-fish, tributary streams which, at a minimum, adhere to the standards practiced in neighboring states.

We hope the Board will take action and adopt policies to protect public health, water and air from herbicide drift, run-off and ground water contamination. Those with authority over Oregon's public state forests have a responsibility to learn about and update Oregon's forestry chemical rules practices to meet the standards practiced by the federal government and other Pacific Northwest states.