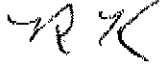


7Mayo2014

To:Forest Practice Board

Subject:Petition For Rule Making RCW 34.05

From:Rob Kavanaugh



RE;RCW76.09 Forest Practice Act and the Oso Mud Slide 22Mar.2014

We have completed our initial investigation into the potential and actual causes of the Oso Mud Slide using reports, interviews, news stories, and public records. Your staff provided substantial and constructive information. Thanks

Please write rules that will accomplish improved public safety, better local and state coordination with respect to writing forest practice permitting and notification to people living near catastrophic mudslide areas to include geological mapping. This would, additionally include close coordination with the Watershed Analysis Unit.

A review of the limited available forest practice permits for Oso/HazelMtn Mud slide area shows many previous public concerns and at least one appeal to prevent logging in this catastrophic hazardous slide area. The DNR failed to retain records of forest permit and associated records going back ten years. Thus not in full compliance with state law.

conversations with DNR Geology staff indicate the DNR was well aware of the potential danger from the Oso Mud Slide yet they failed to adequately alert the residents of Steelhead Lane?

The "Banda" report provides extensive investigation into the danger of this area along with an excellent reference of other scientific investigations of the river basin. DNR subsequently reports dozens and dozens of similar potentially dangerous landslide areas along the river basin.

A review of the Snohomish Co. records will prove useful in your rule making efforts designed to save lives and prevent future similar disasters in Wa.

Please send me a copy of your "lessons learned" report.

cc. Gov. Inslee
Mrs Youngblood



5/13/14

Washington State Forest Practice Board

PO BOX 47012

Olympia, WA 98504

To Whom It May Concern:

I am writing this letter in complaint of forest practices in the Pacific Cascades Region. I became interested in forest practices because of being an avid outdoorsman since I was 5. I noticed a change in the habitats for our wildlife and became concerned by the warning signs being posted by private timber companies and the Department of Natural Resources. While I am not a scientist, I am a college graduate of Washington State University and a 27 year Electrician of IBEW Local 48. Under closer investigation, my suspicions were confirmed by studies completed by the University of Alberta and the USGS. These studies were both done in Pacific Cascades Region and concluded that there were chemicals in fish and a major loss of habitat for the wildlife in the area. All of this information led me to research the forest practices for the state. In the last 10 years there have been 1116 permits approved for aerial chemical sprays in the Pacific Cascades Region. They had all been approved with little to no oversight. My concerns are as listed:

1. No permit fees for private timber companies
2. Permits are good for three years
3. Permits do not list any of the specifics on chemicals used
4. The private timber companies do not follow a habit conservation plan like the DNR.
5. After the permit is approved, the permit is then turned over to the Department of Agriculture and not the DNR.
6. Chemicals that are mixed in a cocktail do not have a listing
7. WAC 222-16-070 this table never triggers a SEPA and always deemed a type 3 permit up to 7000 acres
8. No check for wetlands on permits, except for on private timber lands
9. With no permit fees the private timber companies are wasting tax payers dollars by filing for these permits
10. Endangered species are only listed on the DNR permits. Private timber companies fail to list this information
11. There is no consideration from the Department of Ecology, Department of Agriculture, or the Department of Fish and Wildlife.

I have thoroughly looked over the process over the last year and a half and I am coming to the board to voice these concerns. Since 2006, I have addressed my concerns to my states Lawmakers and my voice has fallen on deaf ears. In conclusion, all the research and studies have shown that these chemicals have an impact on the health of humans, fish and wildlife. It is time to act and review these practices.

1. I am asking for the rules for aerial spraying to be reviewed and changed.
2. I would like to see Atrazine, Velpar DF, Glyphosate and Round Up Extra removed permanently, since they are harmful to humans, fish and wildlife.

In closing, I request a timely response from the Board addressing these concerns. I hope to work with the Board for resolution on these issues.

Sincerely,

Bruce Barnes

Pacific Cascades Region

ASK THE QUESTION?

Rampant use of pesticides on private timber lands in Southwest Washington is contaminating vital forests and waterways, as well as posing a serious health risk to fish, wildlife and human beings. Funding for independent research and a vigorous reform of forest practices are desperately needed to combat this increasing pesticide toxicity.

Chemical sprays are typically dumped on forests by helicopter and often include a cocktail of more than twenty different pesticides and adjuvants. One of the most common chemicals used by timber companies is a herbicide known as atrazine which was banned by the European Union in 2004 because of persistent groundwater contamination. According to the National Toxicology Program, atrazine is "immunotoxic," disrupting the function of the immune system by as much as 70%.

Recently, in the small community of Triangle Lake, Oregon, 41 out of 41 residents tested positive for atrazine contamination as well as another prevalent toxic chemical called 2,4-D. Not coincidentally, residents of Triangle Lake live adjacent to Weyerhaeuser property that had been sprayed heavily with pesticides following a clear cut. Like many communities around the Pacific Northwest, the people of Triangle Lake are now pressing for a moratorium on pesticide sprays.

Despite health concerns, detailed information on pesticide use in specific areas is not readily available and often requires persistent public records requests. According to the Washington Department of Natural Resources, there are now more than 190 distinct pesticide products registered with the state as well as 282 different adjuvants, substances added to a pesticide product to improve its performance.

Although adjuvants can be even more toxic than the active pesticide ingredients, they are not typically subject to the Federal Insecticide, Fungicide and Rodenticide Act requirements for registration. Because of this loophole, little to no toxicity data is available for most adjuvants, and the dearth of information is even more profound when trying to understand the effects of pesticide/adjuvant cocktails.

These issues are of particular importance to Southwest Washington, a logging region rife with aerial pesticide sprays. Last month up to 300 citizens gathered in Longview to share

their concerns with Department of Fish and Wildlife (WDFW) officials that pesticides may be one of the underlying factors causing an epidemic of hoof disease currently ravaging the elk population surrounding Mount St. Helens.

“We noticed when Weyerhaeuser and the landowners came around and started spraying these god awful amounts of pesticides that things started changing,” said one resident of Castle Rock.

A recently published study conducted by researchers from the University of Alberta has given some scientific credence to the public’s perception. According to the researchers, herbicides can dramatically alter the quantity and quality of forage available to elk and deer, reducing their favorite woody plant species by up to 50-70%. Overall, the researchers’ assessment is that “the elk herd at Mount St. Helens is currently in poor nutritional condition compared to other herds in Washington.”

Despite investigating elk hoof disease for five years, and without identifying its cause, WDFW officials admitted at the meeting in Longview that they have not been considering pesticides/herbicides as a potential factor. According to the WDFW website, they are relying upon the National Council for Air and Stream Improvement (NCASI) to help inform their understanding of this issue. Interestingly, NCASI membership is composed of forest products companies and owners/managers of industrial woodlands.

Citizens and wildlife of Southwest Washington are in need of truly independent research in order to understand the impact pesticides are having on the ecosystem. They are also in need of forest practices reform to ensure that toxic chemicals can’t slip under the radar. Government officials had better start showing leadership on these issues, and quickly. People and animals are suffering. The land is sick. Too much is at stake to remain quiet on this issue. I know I won’t.

Written By: Jonathan Gosh

Look Up:

Velpar DF

Atrazine

Cedar Valley OR herbicide spray

Any Questions: Contact Rusty Sauls Pesticide Compliance Investigator 360-902-1903
rsauls@agr.wa.gov